

Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

November 8, 2006

Carole Washburn
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Attention: Al Jones

RE: Docket PG-060146 Kittitas Phase II – Specification Change and Notification of Pressure Test

Dear Mr. Jones:

On June 1, 2006, PSE submitted comprehensive design and construction specifications for Phase II of the Kittitas project as required by the Commission's order granting application for PSE to operate this pipeline up to and including 500 psig. In these specifications, PSE indicated that pressure testing would be accomplished using hydrostatic test methods. This letter is to notify you of a change in the test medium for the Cle Elum pressure regulating station from water to inert gas. Attached is a copy of the revised test procedure for this facility.

Additionally, please accept this letter as notification of commencement of the pressure test for the Cle Elum station in accordance with the requirements set forth in WAC 480-93-170. As discussed with Al Jones on November 2, 2006, this station is scheduled to be tested on November 12, 2006.

Please feel free to contact me at 425-462-3957 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jim Hogan". The signature is stylized and written over a horizontal line.

Jim Hogan
Manager, Standards and Compliance

cc: Kimberly Harris
Karl Karzmar
Sue McLain
Booga Gilbertson
Duane Henderson

Enclosures

BMS
RA

**Puget Sound Energy
Cle Elum Station Air/Inert Gas Pressure Test Procedure
Revision 4
November 7, 2006**

Job No. 109017845
Test Section: Cle Elum Station
Report Test Form 1928

Scope:

The following procedure will be utilized for a nitrogen pressure test of the Cle Elum Station to qualify it for a MAOP of 1,000 PSIG. Proposed initial MOP will be 500 psig. Reference Schematic A for a depiction of the piping to be subject to this test.

Notifications:

The following notifications are required prior to beginning testing procedure:

1. PSE Contractor shall notify the proper Kittitas local authorities.
Kittitas County Public Works (509) 962-7523
PSE contractor to notify homeowners who may be impacted (restricted access) during the testing
2. PSE Construction Coordinator, Don Bain, shall contact Gas Control (425-882-4622).

Regulatory & Operating Requirements:

Test procedures will meet or exceed the requirements of 49 CFR 192.505 which specifies the test requirements for pipelines to operate at a hoop stress of 30 percent or more of SMYS.

Per 49 CFR 192.503 (c) the maximum hoop stress limitation for a Class 2 location, which the Cle Elum Station is classified (refer to UEI class location letter dated 11/6/06), utilizing air or an inert gas is 75% of SMYS.

The Cle Elum Station limiting component for the pressure test is 12.750" O.D. x 0.312" wt X-52 API 5L ERW pipe. Strength calculations for this component of the Cle Elum station piping results in a 100% of SMYS value of 2,545 PSIG and 1,272 PSIG at 50% of SMYS.

The MAOP for Cle Elum station has been set at 1000 PSIG resulting in a minimum pressure test pressure of 1500 PSIG with a maximum pressure test
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pressure of 1650 PSIG. The maximum test pressure of 1650 PSIG test pressure will result in a maximum test on the "weakest" station component to 64.8% of SMYS.

Since the maximum hoop stress limitation of 50% of SMYS is being exceeded during the pressure test, ALL buildings intended for human occupancy MUST be evacuated within 300' of the proposed test fabrication area as directed in 49CFR192.505 (a). Survey identified no structures meeting this criteria. (refer to UEI class location letter dated 11/6/06),

Test Procedure – Record Verification and initial preparation activities

1. Spool across regulators (or remove diaphragms).
2. Remove relief valve and blind the open end. Restore when test is complete.
3. Identify all relevant drawings (PSE-4414D-4011 Cle Elum Station P&ID and 4102 Plot Plan and 4302, 4302A, 4302B Piping Sections) and current as-installed drawings. UEI engineer to review these drawings and reconfirm acceptable for pressure test.
4. Identify and ensure all blind flanges are installed and all access ports are sealed with fittings rated for 2,000 psig minimum.
5. COMPANY designee (Don Bain, (253) 405-4869) shall confirm that all (temporary and permanent) butt welds 2" and greater have been radiographically inspected and no weld defects exist prior to test.
6. COMPANY designee (Don Bain, (253) 405-4869) shall confirm that all (temporary and permanent) welds not radiographically inspected (including but not limited to threadolet, instrument gas piping socket welds, weldolets, etc.) have been inspected by a qualified individual utilizing dye penetrate prior to test.
7. Confirm that all valves are 50% open for the pressure test and blind flanges and/or solid steel plugs installed.
8. Remove and replace with solid steel plugs all body relief valves on ball valves for pressure test (body relief valves are typically set to relieve at 1440 PSIG even though the ANSI 600 Valves have been tested to a minimum pressure of 2160 PSIG).
9. Prepare barricades at safe distances north and south along the private easement east of the test site. Barricades to be

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located at as great a distance as reasonably practical from the testing area, but in no case less than 150 feet. Barricades will be staffed at all times during the test. Traffic will be prevented from entering the private access easement from either direction during the test and lasting until pressure is blown down.

10. Connections shall be provided for the test medium. Valves and fittings used for connections shall have pressure ratings that exceed the maximum test pressure.
11. A test area shall be established a minimum of 75' from the piping to be tested, and at as far a distance as practical (leave a minimum of 20') from the paved portion of State Route 970.
12. A truck or a large piece of construction equipment shall be located as a rudimentary shield for those involved in the testing operations.

Pressure Test Procedure

1. Schedule nitrogen test for a time frame when minimum changes in ambient conditions are forecasted. Nitrogen truck to include a 100' hose to be used for filling piping to be tested.
2. Install temperature chart recorder (0 – 150 deg. F) calibrated within last 6 months (proof of calibration required for project closure files and prior to installation for Pressure test) for ambient temperature monitoring and recording.
3. Install a minimum of two (2) temperature chart recorders (0 – 150 deg F scale) calibrated within last 6 months (proof of calibration required for project closure files and prior to installation for Pressure test). Install thermocouple / temperature sensing element on fabrication piping by utilizing duct tape (lay temperature on top of pipe, parallel with pipe, and secure element. Wrap pipe section a minimum of 18" upstream and downstream with insulation material and water proof same. Install one (1) temperature element with chart recorder close to nitrogen injection point and one (1) temperature element with chart recorder at the furthest point from the air/nitrogen injection point. Allow temperature recorders to stabilize a minimum of two (2) hours prior to start of pressure test.
4. Rig-up pressure test recorder (calibrated from 0 – 2000 PSIG) and ambient temperature chart recorder a minimum of 100 feet from station piping schedule for testing. Pressure recorder and dead weights shall have calibration documentation indicating a calibration test within the last 6 months.

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5. Conduct tailgate safety meeting to discuss the hazards of air/inert gas test. The pipe / fabrication schedule for testing should be "roped-off" with yellow safety ribbon at a minimum radius of 100 feet (this will be known as the test zone) prior to start of pressure test. From a safety standpoint, only designated workers should be allowed to enter the test zone for leak testing.
6. Rig-up nitrogen bottle rack or truck and pressure-up the fabrication piping between 80 and 100 PSIG and hold. Listen for any leaks prior to proceeding into the test zone. Designated workers will visually inspect all above grade welds and "Snoop Test" (snoop is a mixture of water and soap that when applied to a fitting / flange that is leaking will create soap bubbles). Snoop test all weldolets, threadolets, flanges, and other fittings. Once initial leak test is complete, all designated workers are to vacate the test zone.
7. Rig-up nitrogen bottle rack or truck. Increase test pressure to 250 PSIG and hold. Listen for any leaks prior to proceeding into the test zone. Designated workers will visually inspect all above grade welds and "Snoop Test" (snoop is a mixture of water and soap that when applied to a fitting / flange that is leaking will create soap bubbles). Snoop test all weldolets, threadolets, flanges, and other fittings. Once initial leak test is complete, all designated workers are to vacate the test zone.
8. Open valves on nitrogen bottles / truck and proceed to increase the test pressure to 500 PSIG and hold. Listen for any leaks prior to proceeding into the test zone. Designated workers will visually inspect all above grade welds and "Snoop Test" (snoop is a mixture of water and soap that when applied to a fitting / flange that is leaking will create soap bubbles). Snoop test all weldolets, threadolets, flanges, and other fittings. Once initial leak test is complete, all designated workers are to vacate the test zone.
9. Open valves on nitrogen bottles / truck and proceed to increase the test pressure to 750 PSIG and hold. Listen for any leaks prior to proceeding into the test zone. Designated workers will visually inspect all above grade welds and "Snoop Test" (snoop is a mixture of water and soap that when applied to a fitting / flange that is leaking will create soap bubbles). Snoop test all weldolets, threadolets, flanges, and other fittings. Once initial leak test is complete, all designated workers are to vacate the test zone.
10. Open valves on nitrogen bottles / truck and proceed to increase the test pressure to 1000 PSIG and hold. Listen for any leaks prior to proceeding into the test zone. Designated workers will visually inspect all above grade welds and "Snoop Test" (snoop is a mixture of water and soap that when applied to a fitting / flange that is leaking will create soap bubbles). Snoop test all weldolets, threadolets, flanges, and other fittings. Once initial leak test is complete, all designated workers are to vacate the test zone.

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test zone.

11. Open valves on nitrogen bottles / truck and proceed to increase the test pressure to 1250 PSIG and hold. Listen for any leaks prior to proceeding into the test zone. Designated workers will visually inspect all above grade welds and "Snoop Test" (snoop is a mixture of water and soap that when applied to a fitting / flange that is leaking will create soap bubbles). Snoop test all weldolets, threadolets, flanges, and other fittings. Once initial leak test is complete, all designated workers are to vacate the test zone.
12. Open valves on nitrogen bottles / truck and proceed to increase to the final test pressure of 1650 PSIG and hold. Listen for any leaks prior to proceeding into the test zone. Designated workers will visually inspect all above grade welds and "Snoop Test" (snoop is a mixture of water and soap that when applied to a fitting / flange that is leaking will create soap bubbles). Snoop test all weldolets, threadolets, flanges, and other fittings. Once initial leak test is complete, all designated workers are to vacate the test zone.
13. Monitor pressure for 30 minutes and bleed / add nitrogen as required to maintain a minimum test pressure of 1500 PSIG and a maximum test pressure of 1650 PSIG.
14. Fully close valve at piping end of hose and blow down hose at truck end. Start pressure test. Record chart pressure, dead weight pressure and ambient temperature every 15 minutes in the test log.
15. Nitrogen truck to rig-down and leave after one hour provided approval is given by contractor and PSE's test engineer.
16. After eight hours, test records will be reviewed by PSE's test engineer (Jim Walker 425.766.3810 or Joe Ewing 206.255.8165) to confirm the test is satisfactory. Once determined satisfactory, the piping is to be vented down to atmosphere
17. Once the station fabrication piping has been bled to zero psig, fully operate each ball valve to ensure no trapped pressure exists in the body cavity. Remove steel plugs and re-install body relief valves. Restore relief valves and regulators.
18. Contractor to use dry air (confirmed to have a dewpoint of -40F or lower) or nitrogen to pressurize back to a minimum of 20 psig.

RECORDS

- o The completed pressure test forms for each facility tested serve as

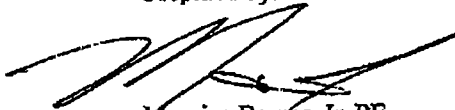
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permanent historical records; therefore, it is mandatory that all required forms be filled out neatly, completely and accurately. Forms shall be completed in the field by the test engineer or technician at the time the test is performed. Copies of all test, regulator and valve records, as-built schematics with markups to indicate piping subject to the test are to be sent to PSE Senior Engineer (Jim Walker, EST04W) to update Engineering records and included in job folder.

- o Company pressure test forms should be used to the extent practical. The test contractor's forms may be used if approved by Company's representative and they are equivalent to the Company's forms and are completed in accordance with instructions for the equivalent Company form.
- o All required test forms and pressure and temperature charts shall be submitted with the as-built data.

Prepared by:



Maurice Barnes, Jr. PE
Project Director, V.P.
Universal Ensco, Inc.

Date: 11/7/06

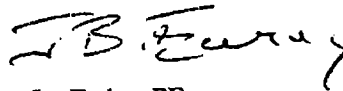
Reviewed by:



Jim Walker, PE
Senior Engineer
Gas System Engineering

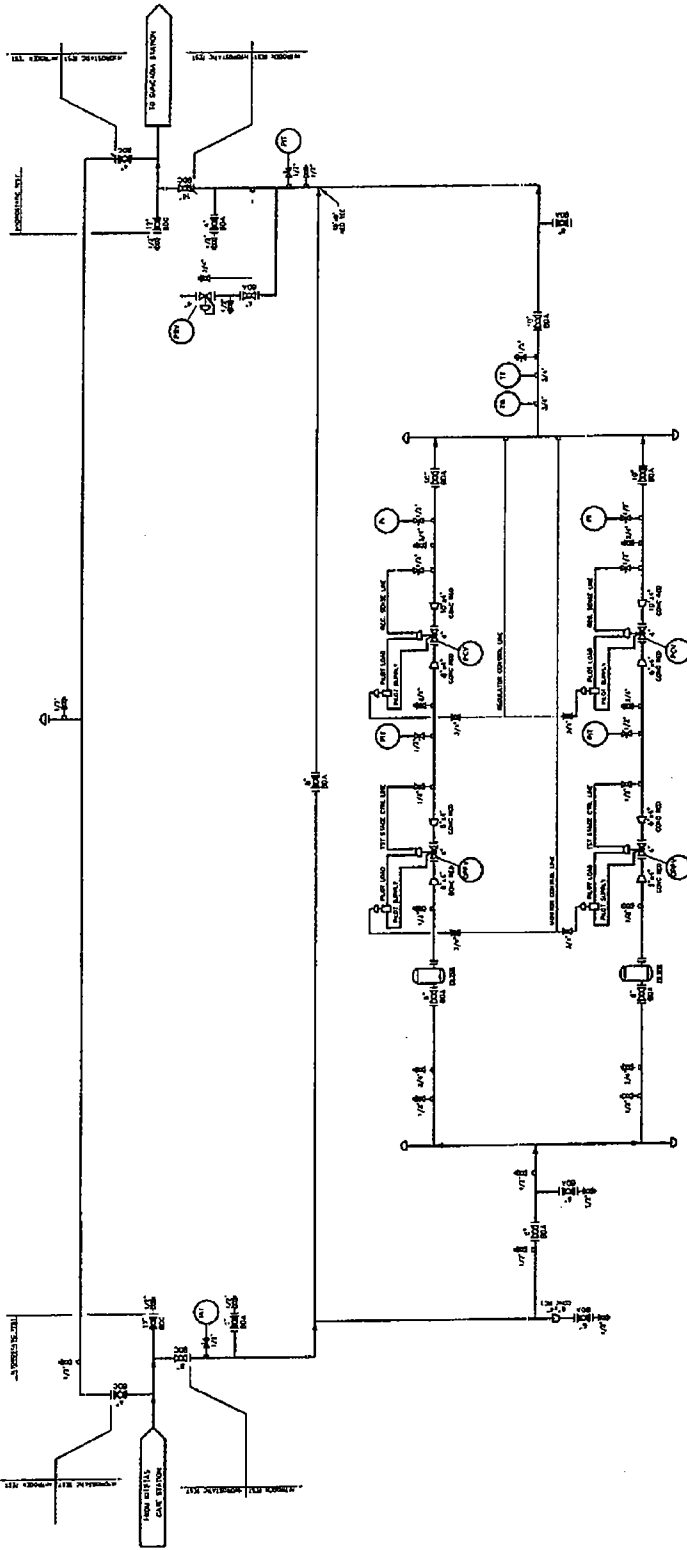
Date: 11/7/06

Approved by:



Joe Ewing, PE
Consulting Engineer
Gas System Engineering

Date: 11/7/06



NO.	DATE	DESCRIPTION	BY	CHECKED	APPROVED

FOR THE PROJECT ENGINEER:  [NAME]
REGISTERED PROFESSIONAL ENGINEER
STATE OF OREGON, LICENSE NO. [NO.]

DATE: [DATE] TIME: [TIME]

PROJECT: [PROJECT NAME]

SCALE: [SCALE]

BY: [NAME]
CHECKED: [NAME]

APPROVED: [NAME]

REVISIONS:

NO. 1 DATE [DATE] DESCRIPTION [DESCRIPTION]

NO. 2 DATE [DATE] DESCRIPTION [DESCRIPTION]

NO. 3 DATE [DATE] DESCRIPTION [DESCRIPTION]

NO. 4 DATE [DATE] DESCRIPTION [DESCRIPTION]

NO. 5 DATE [DATE] DESCRIPTION [DESCRIPTION]

NITELLA COUNTY GAS SYSTEM
NITELLA PRESSURE REGULATORS II
CLE ELUM STATION - SCHEMATIC - A
NO. 0



PUGET SOUND ENERGY



REPORT OF PRESSURE TEST ON NEW MAIN

JOB NUMBER	IR NUMBER	DATE
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JOB LOCATION: _____

CONTRACTOR OR FITTER: _____ INSPECTOR: _____

SECTION TESTED: _____

STARTED _____ AM _____ PM PRESSURE _____ PSIG DATE _____

COMPLETED _____ AM _____ PM PRESSURE _____ PSIG DATE _____

TYPE OF TEST: LEAK STRENGTH

TEST MEDIUM: AIR NITROGEN HYDROSTATIC*

GAUGE: SPRING RECORDING DEAD WEIGHT

LOCATION OF TEMPERATURE PROBE:

T 1 BURIED EXPOSED T 2 BURIED EXPOSED T 3 BURIED EXPOSED T 4 BURIED EXPOSED

***FOR HYDROSTATIC TEST ONLY, THE AMOUNT OF WATER REQUIRED TO:**

1) FILL MAIN _____ 2) RAISE TO LEAK TEST PRESSURE _____

3) RAISE TO STRENGTH TEST PRESSURE _____

RESULTS: ACCEPTED REJECTED PHONE IN PERSON BY: _____

DATE: _____

REMARKS: _____

SIGNED: _____
 PRESSURE CONTROL

READINGS

DATE	TIME	PRESSURE		TEMPERATURE			
		P 1	P 2*	T 1	T 2	T 3	T 4

**IF REQUIRED BY THE WRITTEN PROCEDURE*