



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-082195

**CERTIFIED MAIL**

December 12, 2008

Mike Gardner  
Vice President, Operations  
Cascade Natural Gas Corporation  
222 Fairview Ave., N  
Seattle, WA 98109-5312

Dear Mr. Gardner:

**RE: Data Request Regarding "Hand Jeeping" Practices**

Commission staff (staff) conducted pipeline construction inspections on December 9-10, 2008, at various sites located in Wheeler, Zillah, and Yakima, Washington. The inspections included crews from Cascade Natural Gas (CNG) and Snelson Construction.

During the inspection, staff observed CNG crews evaluating the condition on both 4-inch and 6-inch coated steel pipe using a process described by CNG field personnel as "hand jeeping." The process in part involves the placing of hands on the steel pipe to inspect for coating defects.

The practice of hand jeeping deviates from CNG standards practice (C.P. #605.0491(a)) that states, "*Cascade's standard practice is to 'jeep' pipelines construction of 4" pipe or larger to detect holidays in the pipe coating. All other pipe will be visually inspected.*"

The CNG standard describes jeeping with an electronic holiday detector. A holiday is any defect in the coating such as, gaps in wrapped coating and cracks or thin wall thickness in extruded coating. Electronic jeeping uses a voltage potential to detect any gaps, cracks, or thin coating defects.

Staff agrees with CNG's description of jeeping and the use of electronic holiday detection equipment to verify the integrity of pipeline coatings. Staff considers this an important part of an operators over-all holiday detection and repair procedures.



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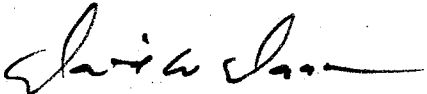
It is staff's opinion that hand jeeping is not recommended as an acceptable industry standard for pipe of this size, unless CNG can provide documentation to the contrary by a reputable group, such as NACE. We are also concerned that CNG has apparently utilized this process for many years on 4-inch and larger diameter pipe and are asking that the company provide clarification in this data request.

Please provide the following information in writing by December 31, 2008:

1. CNG's analysis for justification for hand jeeping 4-inch and larger diameter pipe including documentation based on sound engineering principles, such as a professional group as NACE.
2. How long has hand jeeping been used in lieu of electronic jeeping?
3. Operator qualification records including a copy of the covered task describing the process for hand jeeping, task qualification methods, list of individuals qualified to perform this covered task and dates of qualifications,
4. What pipeline projects, during the past ten years, were hand jeeped in lieu of electronic jeeping within Washington? Please include:
  - a. Date of construction,
  - b. Project location,
  - c. Pipe size,
  - d. Type of coating, and
  - e. Length of pipe.

If you have any questions, please contact Al Jones at (360) 664-1321. Please refer to docket number PG-082195 in any future correspondence regarding this inspection.

Sincerely,



David W. Danner  
Executive Director and Secretary

cc: Anne F. Soiza, Pipeline Safety Director  
Dan Meredith, CNG