

UG-100845-P



MSC-24
P.O. Box 3727
Spokane, WA
99220

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Mr. David Lykken
Pipeline Safety Director
Utilities & Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Proposed Clarkston, WA 6" Natural Gas Main – Proximity Considerations

Dear Mr. Lykken,

Pursuant to WAC 480-93-020, Avista Utilities is requesting approval to operate a natural gas pipeline up to 500 psig within 100 ft of one existing building and two outdoor areas within the US Army Corp of Engineers' Swallows Park in Clarkston, Washington. Avista is proposing to install approximately 15,000 ft of 6" main from the existing Gas Regulator Station #417 at the Snake River crossing from Lewiston, ID to Gas Regulator Station #440 near the vicinity of SR 129 and Critchfield Road. The existing 4" HP distribution line in this vicinity has reached its capacity to adequately supply the gas needs of Clarkston on a design heating degree day but will remain in service after the new line is installed. Installation of the new line will provide a looped high pressure system that will more than triple throughput capacity of gas feed into the Clarkston gas system.

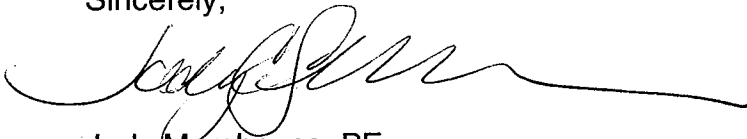
There is only one building within the 100' proximity buffer of the proposed pipeline. It is located at Project Station 92+10 on the enclosed project permit drawing and physically is located 74' from the proposed pipeline. Additionally, there are two playground areas within the 100' proximity buffer along the proposed pipeline route. The first is located at Project Station 53+58 and the second is located at Project Station 55+83. Their distances to the proposed pipeline are 50' and 46' respectively.

Avista's proposed route represents the most feasible alternative for the pipeline's location. A geotechnical engineering consultant was hired in 2009 to study a horizontal directional drilled (HDD) crossing of the Snake River to the west of the confluence of the Snake and the Clearwater Rivers. The consultant's research revealed a low likelihood of success if such a HDD crossing was attempted. Removing this option from the table left one remaining option for a pipeline reinforcement project to increase gas flow into Clarkston. That option is the current proposed pipeline that amplifies capacity of gas flow once it has reached Clarkston (Reg Station #417) via an existing crossing of the Snake River from Lewiston, Idaho and terminating at the large district regulator station at SR 129 and Critchfield (Reg #440).

The pipe specification for the new main will be 6.625" O.D., 0.219" W.T., API-5L Grade X-52, operating at 14.5% SMYS at 500 psig. The high pressure main will be installed in accordance with 49 CFR 192 requirements and Avista standards. To ensure a higher level of integrity and confidence, Avista will test the pipe at a pressure in excess of the 1.5 x MAOP required by standards. Additionally, the pipe will have 42" of cover, more than the 36" required.

I look forward to your approval of this project. Should you have further questions regarding this request I can be reached at 509-495-2760 or you can contact my Project Engineer, Randy Bareither, at 509-495-8716.

Sincerely,



Jody Morehouse, PE
Chief Gas Engineer

JM/rkb
cc: File

Enclosures:

- Drawings E-36697, Clarkston 6" HP Gas Reinforcement