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May 10, 2011

David Lykken  
Director, Pipeline Safety  
Utilities & Transportation Commission  
1300 S. Evergreen Park Dr. S.W  
PO Box 47250  
Olympia, WA 98504-7250

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**Subject: WAC 480-93-020 - Request for Approval – Kitsap Phase 6**

Dear Mr. Lykken:

Pursuant to the requirements of WAC 480-93-020 Proximity Considerations, Cascade Natural Gas Corporation (CNGC) request approval to operate a proposed new 12” pipeline at a Maximum Allowable Operating Pressure (MAOP) of 500 psig, within 100 feet of existing structures intended for human occupancy.

The new 6,000 foot segment of 12” pipeline, named Kitsap Phase 6 will be located in rural Mason County and will be installed in an previously established 50 foot wide pipeline easement paralleling the existing 8” Kitsap Peninsula Transmission Line, with roughly 20 foot of separation between pipelines. The 12” pipeline will begin at the existing Shelton Gate Station near W Deegan Road West and terminate at existing CNGC 12” valve V-61, thereby connecting to the existing 12” Kitsap Peninsula Phase 3 Pipeline. The complete route is depicted on attached aerial map, titled Kitsap Phase 6 – Project Route (Aerial Map #1).

The proposed 12” pipeline will be designed with a minimum component rating of 720 psig and will be pressure tested to a minimum of 1080 psig, in order to equal design and testing specifications of previously installed Kitsap Phase 1, 2, and 3 pipelines, which will ultimately connect together to form one, continuous pipeline system. The MAOP of the new 12” pipeline will be 500 psig. The stress level at the MAOP will be 16.35% of the specified minimum yield strength of the pipe and pipeline fittings, thus, the pipeline will be classified as high pressure distribution main.

Specifications of the 12” pipeline are as follows:

- 6,000 feet of 12” x 0.375” API 5L Grade X-52 Steel line pipe with fusion bonded epoxy coating.
- All fittings (elbows, tees, caps etc.) will be a minimum standard weight, ANSI 16.9 WPHY-52 to meet or exceed the design rating of the 12” line pipe

- All components (valves, line stoppers, etc.) will be ANSI 300 class with a maximum working pressure rating of 720 psig

The new 12” pipeline will be installed within 100 feet of an existing storage business and an existing shed (8’x10’) structure used for storage. There is a 9 lot housing development planned west of the 12” pipeline (2 out of the 9 the proposed residential homes will be located within 100 feet of the 12” pipeline – 1 of those 2 homes is currently under construction). For more detailed information of proximity to structures, refer to aerial map, titled Kitsap 6 – Proximity to Structures (Aerial Map #2).

CNGC reviewed alternative routes and concluded that no other, practical safer routes exist to connect these pipeline systems. The next best route would have a total of 15 proximity considerations associated with it. CNGC believes the safest option available is to continue to utilize an existing and established pipeline corridor that will house two pipelines.

Cascade respectfully requests your approval to move forward with the installation of the proposed 12” Kitsap Phase 6 project, which is scheduled for a construction start of August 2011. If you have any questions or require additional information, feel free to contact me at (509) 734-4552 or via email at [kevin.raschkow@cngc.com](mailto:kevin.raschkow@cngc.com)

Sincerely,  
CASCADE NATURAL GAS



Kevin Raschkow, P.E.  
Manager – Engineering Services

CC: Tim Clark  
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Mike Hardesty

Enclosures