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June 28, 2011

David Lykken
Director, Pipeline Safety
Utilities & Transportation Commission
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PO Box 47250
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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Subject: WAC 480-93-020 Request for Approval – 16” Fredonia Transmission Pipeline Casing Replacement

Dear Mr. Lykken:

Pursuant to the requirements of WAC 480-93-020 Proximity Considerations, Cascade Natural Gas Corporation (CNGC) requests approval to operate a relocated 16” pipeline at a Maximum Allowable Operating Pressure (MAOP) of 500 psig, within 100 feet of existing structures intended for human occupancy.

This request is in conjunction with the proximity request “WAC 480-93-020 Request for Approval – 12” Anacortes Phase 1 Project” (Docket # 111061) submitted on June 10, 2011. The route for the new proposed 16” pipeline follows the same route as a portion of the new proposed 12” pipeline described in previously submitted proximity request, refer to attached map titled “16” Fredonia Transmission Line Casing Replacement”.

The reason for this request is a direct result of Part 192 Subpart O – Gas Transmission Pipeline Integrity Management and the requirement to perform assessments to determine the condition of a given pipeline segment located within a high consequence area. CNGC has identified this segment of transmission pipeline as a high consequence area which requires us to perform assessments to prove the integrity of pipeline. Currently our 16” Fredonia Transmission Line is in a 20” casing located under BNSF’s railroad tracks, approximately 200 feet north of the intersection of Sapp Road and BNSF’s railroad tracks. At this pipeline crossing, the BNSF tracks are elevated via an earth berm roughly 40 feet in height. The current 50 feet of cover over the cased pipeline limits our options for assessing the integrity of pipeline.

We have determined the only feasible option is to relocate this section of pipeline by installing approximately 600 feet of new uncased 16” pipeline, thereby retiring the 216 foot cased pipeline. The new proposed replacement will cross BNSF’s railroad tracks under an existing bridge trestle crossing over Sapp Rd, which will allow us better access to perform future direct assessment to evaluate the integrity of the pipeline. The new pipeline will be installed with a minimum of four feet of cover. The new 16” pipeline will be installed within 100 feet of approximately three

residential homes, one of which was already located within 100 feet of the existing 16” pipeline. For more detailed information of the proximity to homes and proposed route, refer to the attached map titled “16” Fredonia Transmission Line Casing Replacement”.

CNGC believes this installation will significantly increase the safety to the public while not diminishing our ability to provide reliable service to existing customers. The proposed 16” replacement pipeline will be designed and tested to establish a MAOP of 500 psig. The stress level at MAOP will be 24.65% of SMYS and the pipeline will be classified as transmission main.

The new 16” replacement project will include the following:

- 600 feet of 16” x 0.312” 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 16” line pipe
- All components (valves, line stoppers, etc.) will be ANSI 300 class with a maximum working pressure rating of 720 psig

Cascade respectfully requests your approval to move forward with construction and installation of the proposed 16” Fredonia Transmission Casing Replacement project. 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

Sincerely,
CASCADE NATURAL GAS



Kevin Raschkow, P.E.
Manager – Engineering Services

CC: Tim Clark
Steve Kessie
Tina Beach
Ryan Privratsky

Enclosures



16" Fredonia Transmission Casing Replacement