PG-240538



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8113 WEST GRANDRIDGE BOULEVARD, KENNEWICK, WASHINGTON 99336-7166

Date: July 3rd, 2024

Subject: WAC 480-93-020 Longview-Kelso HP Line Proximity Request

To: Jeff Killip, Executive Director and Secretary, Utilities & Transportation Commission

Sender: Colby Lundstrom, Manager of Compliance and Operations Program, Cascade Natural Gas Co. Mailing Address: 8113 W Grandview Blvd, Kennewick, WA 99336-7166 Phone Number: (509) 734-4587 Email Address: <u>Colby.Lundstrom@mdu.com</u>

Identification of Proceeding: N/A

Identification of Documents: CNGC - Longview-Kelso HP Line Proximity Request

July 3rd, 2024

Jeff Killip Utilities & Transportation Commission 621 Woodland Square Loop SE Lacy, WA 98503

Subject: WAC 480-93-020 Longview-Kelso HP Line Proximity Request

Dear Mr. Killip:

Pursuant to the requirements of WAC 480-93-020 Proximity Considerations, Cascade Natural Gas Corporation (CNGC) requests to operate the proposed pipeline at pressure of 330 psig with an MAOP of 340psig within 100 feet of existing buildings or those that are under construction. CNGC is performing this work to maintain core customer needs & large volume industrial needs and to have the ability to supply necessary capacities for future growth in Longview, WA.

Proposed Scope of Work:

The proposed pipeline consists of uprating approximately 22,325 feet of 12-inch steel, 47 feet of 8-inch steel, 437 feet of 6-inch steel, 2542 feet of 4-inch steel, 23 feet of 2-inch steel, and 5 regulator stations. The complete route of this line is depicted on the attached aerial maps located in Appendix A. This Proximity Request is for approval to operate the existing pipeline at a 340 MAOP.

No new pipeline or regulator stations will be installed as a part of this uprate. This project begins at regulator station 54 (R-54) located near 300 Fibre Way. The other stations along the route are R-127, R-38, R-8, R-36, and R-14. The minimum design pressure of these regulator stations are ANSI Class 300 components with a maximum working pressure rating of 720 psig. All existing regulator stations have already been pressure tested to a minimum certification pressure of 400 psig.

At the proposed MAOP of 340 psig, the stress level of the regulator station, pipe, and pipeline fittings will be a maximum of 19.85% of the specified minimum yield strength. Thus, the Longview-Kelso HP Distribution section will be classified as high-pressure distribution main, not Transmission.

Proximity & Alternatives:

The Longview-Kelso HP Distribution line will be within 100 feet of 95 structures as shown in Appendix A.

WAC 480-93-020 - Request for Approval – Longview-Kelso HP Line Proximity Request July 3rd, 2024 Page 3 of 10

Route analysis and protective measures were not taken into consideration of the pipelines route and its proximity to the public and associated facilities. This is due to this being a previously installed gas main and no new HP steel pipeline has to be installed to perform the uprate.

Closing:

CNGC respectfully requests your approval to operate the existing Longivew-Kelso HP Distribution main with a 340psig MAOP & 330psig operating pressure. Uprate is scheduled to begin in August-September of 2024 upon approval of this request. If you have any questions or require additional information, feel free to contact me at (509) 734-4587 or via email at Colby.Lundstrom@mdu.com

Sincerely,

CASCADE NATURAL GAS

uds (7/3/2024

Colby Lundstrom Manager of Compliance Ops. Programs

CC: Pat Darras Mike Schoepp Craig Chapin

Enclosures

Appendix A - Overall view of existing pipeline.

Appendix B - Buildings within 100-foot proximity to the pipeline and facilities

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Figure 1: Overall view of the existing Longview-Kelso HP Distribution system to be uprated from 250psig to 340psig.

Appendix B



Figure 2: Section of the existing Longview-Kelso HP Distribution system to be uprated from 250psig to 340psig. Shows it's proximity to buildings from 300 Fibre Way to 123 15th Ave within the 100ft boundary.



Figure 3: Section of the existing Longview-Kelso HP Distribution system to be uprated from 250psig to 340psig. Shows it's proximity to buildings from 103 Oregon Way to 1300 Prudential Blvd within the 100ft boundary.

Bldg #	J DIST	💌 Bldg. Description 💌	ADDRESS 💌
	1	78 ft. Commercial	300 FIBRE WAY
	2	81 ft. Commercial	921 COLUMBIA BLVD
	3	57 ft. Commercial	20 FIBRE WAY
	4	63 ft. Commercial	957 INDUSTRIAL WAY
	5	60 ft. Commercial	957 INDUSTRIAL WAY
	6	31 ft. Substation	81 FIBRE WAY
	7	66 ft. Commercial	961 INDUSTRIAL WAY
	8	73 ft. Commercial	1005 INDUSTRIAL WAY
	9	69 ft. Commercial	80 INTERNATIONAL WAY
	10	95 ft. Commercial	80 INTERNATIONAL WAY
	11	53 ft. Commercial	40 INTERNATIONAL WAY
	12	73 ft. Commercial	1061 INDUSTRIAL WAY
	13	92 ft. Commercial	1111 INDUSTRIAL WAY
	14	50 ft. Commercial	1291 INDUSTRIAL WAY
	15	49 ft. Commercial	1329 INDUSTRIAL WAY
	16	35 ft. Commercial	1331 INDUSTRIAL WAY
	17	34 ft. Commercial	1341 INDUSTRIAL WAY
	18	72 ft. Commercial	1381 INDUSTRIAL WAY
	19	74 ft. Commercial	1401 INDUSTRIAL WAY
	20	30 ft. Commercial	1445 A INDUSTRIAL WAY
	21	31 ft. Commercial	1465 17 INDUSTRIAL WAY
	22	39 ft. Commercial	1555 16 INDUSTRIAL WAY
	23	87 ft. Commercial	86 PORT WAY
	24	28 ft. Residential	103 OREGON WAY
	25	44 ft. Residential	107 OREGON WAY
	26	95 ft. Residential	123 2 OREGON WAY
	26	95 ft. Residential	123 1 OREGON WAY
	26	95 ft. Residential	123 3 OREGON WAY
	26	95 ft. Residential	123 4 OREGON WAY
	27	70 ft. Residential	138 15TH AVE
	28	39 ft. Residential	111 15TH AVE
	29	80 ft. Residential	123 15TH AVE
	30	31 ft. Residential	114 16TH AVE
	31	66 ft. Residential	118 16TH AVE
	32	42 ft. Residential	107 16TH AVE
	33	42 ft. Residential	106 1 17TH AVE
	33	42 ft. Residential	106 2 17TH AVE

Proximity Buildings

 104.00.000 (10.000) (0 .000000)		
33	42 ft. Residential	106 3 17TH AVE
33	42 ft. Residential	106 4 17TH AVE
34	90 ft. Residential	118 17TH AVE
35	61 ft. Residential	107 17TH AVE
36	31 ft. Residential	102 18TH AVE
37	77 ft. Residential	106 18TH AVE
38	50 ft. Residential	107 18TH AVE
39	96 ft. Residential	115 18TH AVE
40	33 ft. Residential	106 19TH AVE
41	68 ft. Residential	114 19TH AVE
42	36 ft. Residential	113 19TH AVE
42	36 ft. Residential	115 19TH AVE
43	30 ft. Residential	203 20TH AVE
44	78 ft. Residential	207 20TH AVE
44	78 ft. Residential	211 20TH AVE
45	52 ft. Residential	208 21ST AVE
45	52 ft. Residential	210 21ST AVE
46	59 ft. Residential	211 22ND AVE
47	34 ft. Residential	214 23RD AVE
48	73 ft. Residential	216 23RD AVE
49	36 ft. Residential	215 23RD AVE
49	36 ft. Residential	217 23RD AVE
50	29 ft. Residential	206 24TH AVE
51	63 ft. Residential	210 24TH AVE
52	38 ft. Residential	211 24TH AVE
53	88 ft. Residential	225 24TH AVE
54	35 ft. Residential	224 101 25TH AVE
54	35 ft. Residential	224 201 25TH AVE
54	35 ft. Residential	224 102 25TH AVE
54	35 ft. Residential	224 202 25TH AVE
55	83 ft. Residential	228 101 25TH AVE
55	83 ft. Residential	228 201 25TH AVE
55	83 ft. Residential	228 202 25TH AVE
55	83 ft. Residential	228 102 25TH AVE
56	31 ft. Residential	217 25TH AVE
57	67 ft. Residential	229 25TH AVE
58	29 ft. Residential	228 26TH AVE
59	82 ft. Residential	230 26TH AVE

60	59 ft. Residential	231 26TH AVE
61	87 ft. Residential	233 26TH AVE
62	37 ft. Residential	214 27TH AVE
63	74 ft. Residential	220 27TH AVE
64	28 ft. Residential	221 27TH AVE
65	78 ft. Residential	229 27TH AVE
66	37 ft. Residential	216 28TH AVE
67	93 ft. Residential	220 28TH AVE
68	26 ft. Residential	215 28TH AVE
69	67 ft. Residential	221 28TH AVE
70	31 ft. Residential	220 29TH AVE
71	69 ft. Residential	228 29TH AVE
72	27 ft. Residential	235 29TH AVE
73	63 ft. Residential	243 29TH AVE
74	26 ft. Residential	228 BEECH ST
75	66 ft. Residential	234 BEECH ST
76	32 ft. Residential	227 1 BEECH ST
76	32 ft. Residential	227 2 BEECH ST
76	32 ft. Residential	227 3 BEECH ST
77	67 ft. Residential	235 1 BEECH ST
77	67 ft. Residential	235 2 BEECH ST
77	67 ft. Residential	235 3 BEECH ST
78	34 ft. Residential	202 3 BALTIMORE ST
78	34 ft. Residential	202 1 BALTIMORE ST
78	34 ft. Residential	202 2 BALTIMORE ST
79	81 ft. Residential	210 1 BALTIMORE ST
79	81 ft. Residential	210 2 BALTIMORE ST
79	81 ft. Residential	210 3 BALTIMORE ST
80	63 ft. Residential	217 1 BALTIMORE ST
80	63 ft. Residential	217 2 BALTIMORE ST
80	63 ft. Residential	217 3 BALTIMORE ST
81	27 ft. Residential	202 CYPRESS ST
81	27 ft. Residential	204 CYPRESS ST
82	77 ft. Residential	206 CYPRESS ST
82	77 ft. Residential	208 CYPRESS ST
83	20 ft. Residential	203 CYPRESS ST
83	20 ft. Residential	205 CYPRESS ST
84	61 ft. Residential	207 CYPRESS ST

115	84	61 ft. Residential	209 CYPRESS ST
116	85	27 ft. Residential	210 COLORADO ST
117	86	73 ft. Residential	212 COLORADO ST
118	87	27 ft. Residential	209 COLORADO ST
119	88	73 ft. Residential	211 COLORADO ST
120	89	24 ft. Residential	204 CAROLINA ST
121	90	71 ft. Residential	206 CAROLINA ST
122	91	21 ft. Residential	205 C CAROLINA ST
123	91	21 ft. Residential	205 B CAROLINA ST
124	91	21 ft. Residential	205 A CAROLINA ST
125	92	87 ft. Commercial	201 DOUGLAS ST
126	93	15 ft. Commercial	3357 WASHINGTON WAY
127	93	15 ft. Commercial	3353 WASHINGTON WAY
128	94	0 ft. Substation	3401 INDUSTRIAL WAY ?
129	95	67 ft. Industrial	3400 INDUSTRIAL WAY