INLAND EMPIRE
PAPER COMPANY
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February 28, 2008

Mr. David Lykken
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W. P.O. Box 47250
Olympia, WA 98504-7250

Reference: 2007 - Gas Pipeline Safety Audit PG-070010

Dear Mr. Lykken:

Inland Empire Paper Company (IEP) has addressed or responded to all of the items raised in your Natural Gas Safety Inspection, PG-070010. The following items either describe the changes made to our manuals or respond to the item addressed in your inspection.

1 & 2 & 3. Procedures for requiring notification to the commission within two hours for an incident that results in the evacuation of a building or results in pipeline system pressure exceeding the MAOP plus 10 percent.

IEP has modified section 10.1.2 of its Emergency Response Manual. We have removed the "six hour notification" and the manual now says the commission should be notified within two hours of all listed incidents. IEP has added a line item "Results in the evacuation of a building or high occupancy structure" to the list of incidents. IEP has also added wording to line item "f" that now states "Results in the system pressure exceeding the maximum allowable operating pressure plus 10 percent or the maximum pressure allowed by proximity considerations." See the enclosed update to section 10 of IEP's Emergency Response Manual, (ERM).

4 & 5. Procedure for requiring notification to the commission within 24 hours of incidents that result in the uncontrolled release of gas for more than two hours, or the taking of a high pressure pipeline out of service.

IEP has added "section 10.1.3" to our ERM. It reads "In accordance with WAC rules 480-93-200, the company should give notification to the commission within 24 hours for the following incidents: a) Results in the uncontrolled release of gas for more than two hours: b) Requires the taking of any segment of a transmission pipeline out of service; or lowering its pressure 50 percent below its normal operating pressure". See the enclosed update to section 10 of IEP's ERM.

6. **Procedure for requiring a written report be submitted to the commission within 45 days of receiving the failure analysis due to construction defects or material failure.**

IEP has added line item "G. The failure analysis of any incident or hazardous condition due to construction defects or material failure will be reported to the WUTC within 45 days" to section 7.01 of the Operating and Maintenance Manual, "O&M manual". See the enclosed update to section 7.01 of the O&M manual.

7. **Procedure for completing PHMSA form F-7100.2-1 by March 15 for the previous calendar year and sending a copy to the commission.**

IEP has added a sentence to section 3.15 of the O&M manual stating that "A copy of this report will be sent to the WUTC." See enclosed update to section 3.15 of O&M manual.

8. **Procedure for requiring a report titled "Damage Prevention Statistics" will be submitted to the commission by March 15 for the preceding calendar year.**

IEP has added an item 2 to section 3.15 of the O&M manual that states "A Damage Prevention Statistics Report will be completed and submitted to the WUTC by March 15 for the preceding calendar year. It is the responsibility of the power plant superintendent to complete this form". See enclosed update to section 3.15 of O&M manual.

9. **Procedure for requiring a "report detailing construction defects and material failures resulting in leakage" be submitted to the commission by March 15 for the preceding calendar year.**

IEP has added an item 3 to section 3.15 of the O&M manual that states "A report detailing all construction defects and material failures resulting in leakage will be submitted to the WUTC by March 15 for the preceding calendar year. It is the responsibility of the power plant superintendent to complete this form". See enclosed update to section 3.15 of O&M manual.

10. **Procedure to file with the commission and appropriate officials an updated list of emergency contact information.**

IEP has added a paragraph to section 4.04 of the O&M manual that states "Each calendar year, a list of emergency contact personnel will be updated and distributed to the commission and appropriate public officials". See enclosed update to section 4.04 of O&M manual.

11. **Procedure to provide the commission with daily construction and repair activity reports.**

IEP has added a section 3.16 in our O&M manual. It states "A daily construction and repair activity schedule will be provided to the commission during times of active work on the pipeline."

12. Procedure to submit MIS Data Collection Form to the commission when required to submit the form to the DOT.

IEP has added a paragraph to page 27 of the Anti-Drug Plan in its O&M manual. It states that "when required by the DOT to submit a MIS Data Collection Form, a copy will also be sent to the WUTC". See enclosed updated page of Anti-Drug Plan.

13. Requirement of new transmission lines to be constructed to accommodate the passage of instrumented internal inspection device.

IEP has added a paragraph to section 2.11 of its O&M manual. It states that "Any new pipeline construction or modifications will be designed and constructed to accommodate the passage of instrumented internal inspection devices". See enclosed update to section 2.11 of O&M manual.

14. Requirement of testing equipment to record and document welding essential variables.

IEP has added a sentence onto paragraph 6.06.3.2 that states "During the test, necessary testing equipment will be used to measure the essential welding variables". See enclosed update to section 6.06.3.2.

15. Requirement that qualified written welding procedures will be located on-site where welding is being performed.

IEP has added a line item #4 to section 3.05 of the O&M manual. It states "Written welding procedures will be located on-site when welding is being performed." See enclosed update to section 3.05 of O&M manual.

16 & 17. Requirement of inspection of each transmission line, line parts, pipe, and components at the site of installation and during construction to ensure no damage has occurred.

IEP has changed a statement and added a statement in section 6.10.1 of its O&M manual. These state "All transmission line pipe and components will be inspected at the site of installation" and "The feeder main shall be inspected during construction. These inspections shall be conducted by a qualified company representative".

18. Requirement for detailed written procedures explaining how cathodic protection related surveys and tests will be conducted.

IEP has modified section 3.11 "Cathodic Protection" to include detailed written procedures. See enclosed updated section 3.11 of O&M manual.

19. Requirement that a CP test read be taken on all exposed facilities where the coating has been removed.

IEP has modified section 3.09 of the O&M manual. It states that "when underground piping is exposed, the piping will be inspected for adequate coating and a CP potential will be taken". See enclosed update to section 3.09 of the O&M manual.

20. **Requirement that during atmospheric corrosion surveys, special attention be made to soil/air interfaces, thermal insulation, under disbanded coating, and pipe supports.**

IEP has modified section 3.11 "Cathodic Protection". It includes paragraphs referencing "riser piping", "pipe supports", etc. See enclosed updated section 3.11 of O&M manual.

21. **Requirement that records for each cathodic protection test, survey, or inspection required be retained.**

IEP has added a section in 3.11 "Cathodic Protection" of the O&M manual that states "All instrument checks and pipeline reports will be kept on file for the life of the pipeline".

22 & 23. **Requirement that casings be inspected/tested for electrical isolation annually, not to exceed 15 months; and that casings be leak surveyed within 90 days of discovery of a shorted condition and twice annually thereafter.**

IEP has added the words "taken annually" into section 3.11 of the O&M manual that describes the "casing P/S voltage" testing. Section 3.11 also currently states that "The short will be cleared within 90 days." See enclosed updated section 3.11 of O&M manual.

24. **Requirement that CP test equipment and instruments be calibrated or checked for accuracy at intervals recommended by the manufacturer.**

IEP has added a paragraph titled "CP Voltmeter Accuracy Check" which describes the accuracy check and states that "This accuracy check will be done annually". See enclosed updated section 3.11 of O&M manual.

25. **Requirement for procedures to ensure that the provisions found under 192.503(a) thru (d) for new segments of pipeline, or relocated or replaced segments of pipeline are met.**

IEP has added a section 6.01.7 to its O&M manual that states "Prior to putting any new, relocated, or replaced section of pipe into operation, the pipe shall be tested in accordance with CFR 192-503". See enclosed updated section 6.01.7 of O&M manual.

26. **Requirement for procedures to ensure that the requirements of 192.507 (a) thru (c) are met for pipelines that operate at a hoop stress less than 30 percent of SMYS and at or above 100 psig.**

IEP has added wording into section 6.09.8 of the O&M manual that addresses CFR 192-507. See enclosed updated section 6.09 of the O&M manual.

27. Requirement for notification in writing to the WUTC at least two business days prior to any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of 20 percent or more of SMYS.

IEP has added a statement in section 6.09.1 that states "The WUTC will be notified in writing at least two business days prior to any pressure test that will have a MAOP that produces a hoop stress of 20 percent or more of the SMYS". See enclosed updated section 6.09 of O&M manual.

28. IEP relocated a segment of pipeline in August of 2005. The WUTC gas inspection states that IEP's pressure test was less than eight hours in duration; this is incorrect.

IEP conducted a pressure test for 25 hours in length. During the first part of the test, the temperature dropped which dropped the pressure below the desired level. At approximately six hours into the test, the pipe was inspected and test equipment fittings were inspected for leaks, none were found. Nitrogen was then added to get the pressure back up above the desired test pressure. During the night, the temperature continued to drop and so did the pressure. The test pressure dropped to 1170 psig, but the next morning as the temperature rose, the pressure rose up to a pressure well above the original pressure. The time duration after charging the line with additional nitrogen was 19 hours. The pressure did drop below the desired 1217 psig pressure for the test, but this was strictly due to temperature and as the temperature came back up, so did the pressure.

IEP has also added a paragraph in section 6.09.1 of the O&M manual that states "Any pressure test for a pipe segment having a MAOP that produces a hoop stress above 20 percent of the SMYS will be a minimum of eight hours in length". See enclosed updated section 6.09 of O&M manual.

29. Requirement that when a test medium is to be a gas or compressible fluid, the appropriate public officials must be notified.

IEP has added a section in 6.09.1 of the O&M manual that states "The appropriate public officials will also be notified prior to the pressure test". See enclosed updated section 6.09.1 of the O&M manual.

30. Requirement that records of all pressure tests performed and information listed under 480-93-170(7) be maintained for the life of the pipeline.

IEP has added a section 6.09.9 to the O&M manual. It states that "All data for pressure testes performed shall be kept for the life of the pipeline. This data to include information listed under WAC 480-93-170(7)." See enclosed updated section 6.09.9 of the O&M manual.

31. Requirement for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged.

IEP has added a section 3.07.7 to its O&M manual. It states "A follow-up inspection of the pipeline will be conducted where there is reason to believe the pipeline could be damaged."

32. **Finding that IEP's manual states that all pressure tests will be 1212 psig. The applicable factor for IEP's gas line is 1.5; therefore, for an MAOP of 811, all pressure tests on IEP's gas line should be conducted at 1217 psig.**

IEP has changed its manual to read "The pressure test shall be a minimum of 1217 psig, as designated by CFR 192.619 for pipe installed in class location 3 and 4". See enclosed updated section 6.09.1 of the O&M manual.

33. **Requirement that odorant testing equipment be calibrated in accordance with manufacturers recommendations.**

IEP has added a line in section 3.10 of the O&M manual that states "The odorator instrument will be calibrated on an annual basis". See updated section 3.10 of O&M manual.

34. **Requirement that records be maintained for odorant usage, odorant tests, and equipment calibration for five years.**

IEP has changed the record keeping requirement for odorant records from three years to five years. See updated section 3.10 of O&M manual.

35. **Finding that IEP's Emergency Response Manual, section 2.4 states that "a leak will be responded to by going to the meter station and closing the valve". The WUTC feels it better to first respond to the source of the odor or leak to ensure adequate public safety.**

IEP has rewritten section 2.4 of its ERM. See enclosed updated section 2.4.

36. **Requirement that prevents the removal of any suspected gas facility involved in an incident until the commission or lead investigative authority has designated the release of the gas facility.**

IEP has added a sentence in section 3.02.2 of the O&M manual that states "Any suspected gas facility involved in the incident will not be removed until the commission or lead investigative authority has designated the release of the gas facility." See updated section 3.02 of O&M manual.

37. **Requirement to take appropriate action and provide notification when leak indications originate from a foreign source.**

IEP has added a paragraph in section 2.4 of the ERM that states "All leaks detected coming from a foreign source will be reported immediately to the foreign source operator". See enclosed updated section 2.4.

38 & 40. Requirement for follow-up inspection on repaired leaks no later than 30 days following the repair; and that gas detection instruments be tested for accuracy at intervals recommended by the manufacturer.

IEP has added a section 3.02.5 in the O&M manual that states "A follow-up inspection with a combustible gas detector will be conducted to all repaired leaks no later than 30 days following the repair. The combustible gas detector will be calibrated monthly as per manufacturer's recommendation". See updated section 3.02.5 of O&M manual. IEP has also added a sentence in section 4.02 of the O&M manual describing leak surveys, which states "The gas detector will be calibrated within a 90 day period using 50 ppm test gas." See updated section 4.02 of O&M manual.

39. Requirement that gas leak records contain the criteria outlined in WAC 480-93-187.

IEP has added a section 2.5 to the ERM. Section 2.5 is a new "Gas Leak Records Report". The new report form includes all the information in WAC 480-93-187. See enclosed ERM Section 2.5.

41. Requirement that survey records be kept for a minimum of five years and contain all the information required under WAC 480-93-185(5).

IEP has added a paragraph to section 2.07 of the O&M manual that states "All records of leak surveys shall be kept for a minimum of five years, surveys should include information required under WAC 480-93-188(5)". See updated section 2.07 of the O&M manual.

42. Requirement that markers reported missing or damaged be replaced within 45 days.

IEP has added a sentence in section 4.01.4 of the O&M manual that states "Missing or damaged line markers will be replaced within 45 days". See updated section 4.01.4 of the O&M manual.

43. Requirement that any inoperable valve that might be required during an emergency have prompt remedial action taken or that an alternative valve be designated.

IEP has added a paragraph in section 4.05 of it O&M manual that states "Any valve found inoperable will have prompt remedial action taken or an alternative valve will be designated". See updated section 4.05.

44. Requirement that records be updated no later than six months from completion of construction activity and that they are made available to appropriate personnel.

IEP has added item 6.01.8 to its O&M manual. This item states "At the completion of construction activity, the pipeline records shall be updated within six months. The records shall be made available to appropriate personnel."

45. Requirement to submit a written request and receive commission approval prior to operating above 250 psig and 500 psig.

IEP has added a paragraph in section 2.01 that states "A written request shall be filed with the commission prior to operating the pipeline above 250 psig". See updated section 2.01 of the O&M manual.

46. Requirement that pressure tests be performed on new and replacement pipelines. The WUTC inspection report states that IEP does not have pressure test procedures in their manual.

IEP does have a section 6.09 titled "Testing" that describes many details of the pressure test, including a section 6.09.8 titled "Testing Procedures". IEP did not have any requirement to "perform a leak test at a pressure between 100 psig and the pressure required to produce a hoop stress of 20 percent of SMYS; or walk the line to check for leaks while the hoop stress is held at approximately 20 percent of SMYS." IEP has added a paragraph into section 6.09.8 that states "If, during the test, the segment is to be stressed to 20 percent or more of SMYS and natural gas, inert gas, or air is the medium - A leak test must be made at a pressure between 100 psig and the pressure required to produce a hoop stress of 20 percent of SMYS; or the line must be walked to check for leaks while the hoop stress is held at approximately 20 percent of SMYS."

47. Requirement that whenever any section of pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion.

IEP does have this requirement in our O&M manual in section 3.09. During the August 2005 gas line relocation, IEP's gas line was exposed at both ends of the relocation. I did inspect the internals of the pipe and they were in near perfect condition. I could not find my documentation of this inspection, but the inspection was conducted per section 3.09 of the O&M manual.

48. Requirement to check the half cells for accuracy as recommended by the manufacturer; and requirement to maintain those records to prove compliance.

IEP has updated section 3.11 of the O&M manual. It now includes a section for "Copper Sulfate Reference Cell Accuracy Check" and a statement that "The voltmeter and copper sulfate cell accuracy checks will be recorded in the annual CP report." These reports are to be kept for the life of the pipeline.

Inland Empire Paper Company

Area of Concern: Ray Allen has not always recorded the actual date of some of the maintenance activities. Ray will record the actual dates of any work performed in the future.

This should address all areas of concern identified by your inspection report PG-070010. If you have any questions or concerns, please contact me at 509-924-1911.

Sincerely,

Kevin Davis

Kevin Davis
Paper Machine Superintendent

3) The time of the incident.

4) The number of fatalities and personal injuries, if any.

5) All other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages.

2) Washington Utilities and Transportation Commission (WUTC)

In accordance with WUTC, WAC rules 480-93-200, 480-93-183, and 480-93-210, each company should give notification within two hours to the commission of every accident or incident arising out of its facilities employed in the transmission of gas which:

a) results in a fatality or personal injury requiring hospitalization; or
b) results in damage to the property of the company and others of a combined total exceeding $50,000.
c) results in gas escaping and igniting; or
d) believed will received media coverage; or
e) is significant, in the judgment of the company, even though it does not meet the criteria of subparagraphs (a) through (e).
f) results in the system pressure exceeding the maximum allowable operating pressure plus 10 percent or the maximum pressure allowed by proximity considerations.
g) results in the evacuation of a building or high occupancy structure.

Such reports shall be verified within 30 days in detail in writing if not so reported initially and shall include at least the following:

a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged; and
b) The extend of such injuries and/or damages; and
c) A description of the accident or incident to include date, time, and place.

This notice shall be made by telephone to the personnel shown on page 7-11 of this manual.

In accordance with WAC rules 480-93-200, each company should give notification to the commission within 24 hours for the following incidents:

a) results in the uncontrolled release of gas for more than two hours.
b) requires the taking of any segment of a transmission pipeline out of service; or lowering its pressure 50 percent below its normal operating pressure.

10.2 Written Reports

1) DOT Incident Report
Each operator of a transmission pipeline shall submit Department of Transportation Form RSPA F 7100.2 as soon as practical but not more than 30 days after an incident required to be reported as outlined in Section 10.1, 1). When additional information is obtained after a report is submitted, the operator shall make a supplemental report as soon as practical with a clear reference by date and subject to the original report.

2) WUTC - Record and Self Audit
In accordance with WUTC, WAC: 480-93-187, each gas company must maintain historical gas leak repair records.

The following data shall be recorded and maintained:

a) Date detected, time reported, time dispatched, time investigated, and by whom.

b) Date reevaluated before repair and by whom.

c) Date repaired, time of repair when a Grade 1 leak is involved, and by whom.

d) Date reche4cked after repair and by whom.

e) If reportable leak, date and time of telephone report to regulatory authority and by whom.

f) Location of leak. (Sufficiently described to allow ready location by other competent personnel).

g) Leak grade.

h) Line use. (Distribution, transmission, etc).

i) Method of leak detection. (If reported by outside party, list name and address).

j) Part of system where leak occurred. (Main, service, etc).

k) Part of system which leaked. (Pipe, valve, fitting, compressor, or regulator station, etc).

l) Material which leaded. (Steel, plastic, cast iron, etc).

m) Origin of leak.

n) Pipe description.

o) Type repair.

p) Leak cause.

q) Date pipe installed (if known).

r) Under cathodic protection? Yes_____ No _____

s) Magnitude of CGI readings at appropriate locations which are a part of the classification procedures contained in Table 1 of WAC 480-93-186 (codified as WQC 480-93-18601).

The data to be recorded on leaks which have been appropriately graded as ``Grade 3'' may be at the

company's discretion, but must include, as a minimum, information necessary to allow for proper follow-up action to be accomplished.

Self Audits. In order that the effectiveness of the leak repair program may be evaluated, the following self audits shall be performed by each gas company:

a) repair scheduling - assure that repairs are made within the time specified.

b) repair effectiveness - assure that leak repairs are effective.

c) Check adequacy of records. (Order R-194, S 480-93-198, filed 5/18/77).

10.3 Accident Reports

Employees who are injured as a result of a pipeline leak or in responding to a pipeline leak should fill out the following forms:

1) Self Insurer Accident Report (SIF-2)

2) IEP Accident Report

10.4 Evacuee Registration Form

EVACUEE REGISTRATIN FORM

Date:_____

A Name:_____

Number in party:_____

Resident Telephone No.:_____

B Temporary Residence:_____

Telephone No.:_____

C Comments:_____

_____

_____

_____

7.01 CONDITIONS THAT REQUIRE REPORTING

A. In the case of a pipeline that operates at a hoop stress of 20 percent or more of its specified minimum yield strength (transmission main) general corrosion that has reduced the wall thickness to less than that required for the maximum allowable operating pressure, and localized corrosion pitting to a degree where leakage might result.

B. Unintended movement or abnormal loading by environmental causes, such as an earthquake, landslide, or flood, that impairs the serviceability of a pipeline.

C. Any material defect or physical damage that impairs the serviceability of a pipeline that operates at a hoop stress of 20 percent or more of its specified minimum yield strength.

D. Any malfunction or operating error that causes the pressure of a pipeline that contains gas to rise above its maximum allowable operating pressure plus the buildup allowed for operation of pressure limiting or control devices.

E. A leak in a pipeline that contains gas that constitutes an emergency.

F. Any safety-related condition that could lead to an imminent hazard and causes (either directly or indirectly by remedial action of the operator), for purposes other than abandonment, a 20 percent or more reduction in operating pressure of shutdown of operation of a pipeline that contains gas.

G. The failure analysis of any incident or hazardous condition due to construction defects or material failure will be reported to the WUTC within 45 days.

3.15 INSTRUCTIONS FOR CONDUCTING ANNUAL DOT REPORT

1) DOT report Form PHMSA F 7100.2-1 will be completed and submitted to the DOT by March 15 for the preceding calendar year. It is the responsibility of the power plant superintendent to complete this form. A copy of this report will be sent to the WUTC.

2) A "Damage Prevention Statistics Report" will be completed and submitted to the WUTC by March 15 for the preceding calendar year. It is the responsibility of the power plant superintendent to complete this form.

3) A report detailing all construction defects and material failures resulting in leakage will be submitted to the WUTC by March 15 for the preceding calendar year. It is the responsibility of the power plant superintendent to complete this form.

4.04 PUBLIC AWARENESS PROGRAM

POLICY

The purpose of this section is to put forth in writing Inland Empire Paper Company's commitment to achieving an effective "Public Awareness Program" pertaining to its natural gas pipeline.

It is the responsibility of the Power Plant Superintendent to administer the program, make the contact and document the communication with the stakeholders. The Power Plant Superintendent will work in conjunction with the Natural Gas Consultant to identify and keep up to date the appropriate stakeholders.

The current key figures are:

Power Plant Superintendent:	Kevin Davis
Natural Gas Consultant:	Ray Allen

Each calendar year all ROW owners and adjacent property owners shall be contacted and informed of the pipeline's location.

Each calendar year local Fire, Sheriff, and Police Departments will be contacted and informed of the pipeline's location and about unlikely, but possible, blowing gas and fires.

Each calendar year, a list of emergency contact personnel will be updated and distributed to the commission and appropriate public officials.

Each calendar year, Inland Empire Paper Company will participate in the local Utility Coordinating Council to educate the excavators, contractors, and land developers as to the importance of "One-Call" requirements and underground utility awareness.

Each calendar year, the Power Plant Superintendent will work with the Natural Gas Consultant to evaluate the "Public Awareness Program" and initiate program enhancements as needed.

INDEX

3.16 DAILY CONSTRUCTION AND REPAIR ACTIVITY SCHEDULE

A daily construction and repair activity schedule will be provided to the commission during times of active work on the pipeline.

DOT Procedures. Statistical data related to drug testing and rehabilitation that is not name-specific and training records must be made available to the Administrator or the representative of a state agency upon request.

When required by the DOT to submit a "DOT Drug and Alcohol Testing MIS Data Collection Form", a copy will also be sent to the WUTC.

POLICY NO. 11

GAS OPERATING AND MAINTENANCE PLANS

2.11 PIPELINE CONSTRUCTION SPECIFICATIONS

SCOPE

To set forth standards and guidelines that shall be followed on construction of IEP's pipeline.

POLICY

The Natural Gas Pipeline system shall be constructed and repaired in compliance with the provisions of the "Minimum Federal Safety Standards", Part 192, CFR 49 as issued and amended by the Office of Pipeline Safety, U.S. Department of Transportation.

Any new pipeline construction or modifications will be designed and constructed to accommodate the passage of instrumented internal inspection devices.

RESPONSIBILITIES

The Power Plant Superintendent shall be responsible for updating as needed and for providing compliance by Company employees and contractor.

6.06 WELDING

6.06.1 GENERAL

This part covers the qualifications of welding procedures and welders, standard welding practices, and the inspection and testing of welds.

6.06.2 QUALIFICATION OF WELDING PROCEDURES

6.06.2.1 GENERAL

Each welding procedure specification shall be recorded on Form WPS. The results of the qualifying tests shall be recorded on Form PQR.* These records must be retained and followed whenever welding is performed on IEP's natural gas Pipeline System.

6.06.2.2 QUALIFICATION

Each welding procedure shall be qualified under Section 2 of API Standard 1104, current issue, for circumferential butt welding.

6.06.2.3 PROCEDURES QUALIFIED

For the following pipe sizes:

a) 1-1/4" thru 6" butt weld WPS-1*
b) 1/4" thru 3/4" coupling fillet weld WPS-2*

* Welding qualification test data and a copy of PQR-1, PQR-2, WPS-1, and WPS-2 are included in the Appendix.

6.06.3 QUALIFICATION OF WELDERS

6.06.3.1 GENERAL

All welding on IEP natural gas facilities shall be done by certified welders using previously qualified company welders' procedures.

6.06.3.2 QUALIFICATION TESTS

A welder shall be certified to weld on IEP natural gas facilities by qualifying according to Section 6 of API Standard 1104. During the test, necessary testing equipment will be used to measure the essential welding variables.

3.05 WELDING

All gas system welding shall be performed by welder(s) qualified in accordance to the following API Recommended Pipeline Welding Practices:

NEW CONSTRUCTION WELDING - API 1104

MAINTENANCE AND REPAIR WELDING - API 1107

1. All gas system welding shall be done in accordance to these standards.

2. All welders must have and carry a current valid welding certificate.

3. No welder qualified under API 1104 and/or API 1107 may weld unless, within the preceding six calendar months, he has been qualified and certified.

4. Written welding procedures will be located on site when welding is being performed.

6.10 INSTALLATION

6.10.1 GENERAL

The CONTRACTOR shall PROVIDE all labor, MATERIALS, and EQUIPMENT required to install the piping system.

Care must be taken to ensure that the coatings and joints are not damaged during installation. All damaged coating shall be repaired and retested per paragraph 6.08.1.

All transmission line pipe and components will be inspected at the site of installation. The feeder main shall be inspected during construction. These inspections shall be conducted by a qualified company representative.

CONTRACTOR shall pad the bottom of the trench with 6" of approved padding at any section where rock, gravel, or boulders are liable to damage pipe coating.

All end flanges must be sealed with a blind flange prior to any backfilling. All other pipe ends (except the river intakes) must be securely sealed to the ENGINEER'S approval.

6.10.2 MEASUREMENT

Measurements for the purpose of progress payments and as-built location of pipeline accessories shall be made by contour chaining parallel to the ditch line at finished surface grade and from center to center of fittings. All measurements must be witnessed by both the CONTRACTOR and OWNER'S Representative.

3.11 CATHODIC PROTECTION

GENERAL

The 4-inch feeder main is cathodically protected by an impressed current system. The rectifier and ground bed are located just off Upriver Drive.

CRITERIA FOR CATHODIC PROTECTION

A minimum pipe-to-soil (P/S) voltage of -.85 volts is the expected norm, using a copper sulfate half cell as a reference. Reference NACE standard SP0169-2007

FREQUENCY OF TEST

Monthly - A CP voltage will be taken at a pipeline test station 50' south of WGPC meter station. The CP reading will be reported in consultant's monthly report.

Bimonthly - The cathodic protection rectifier will be inspected six (6) times per year (with intervals not exceeding 2-1/2 months). DC volts and amperes readings will be reported in the monthly report.

Annually - A pipe-to-soil voltage survey shall be made of all test points along the pipeline.

REMEDIAL ACTION - POSSIBLE SHORTED CONDITION

If the monthly CP reading at the pipeline test station near WGPC station is more positive than -.85 volts, remedial action shall be taken within 10 days to restore a minimum P/S voltage of -1.00 volts.

If the casing P/S voltage, taken annually, is more negative by .2 volts from the previous survey, a shorted casing test shall be done. If a short is found, the ends of the casing will be exposed and insulating material will be inserted as needed. If this does not clear the short, the pipeline will be removed from the casing and reinserted with proper casing insulating spacers. The short will be cleared within 90 days.

ATMOSPHERIC CORROSION

Atmospheric corrosion (corrosion pitting on above-ground gas system) will be reevaluated at intervals not exceeding three (3) years. If found, remedial action shall be taken within 90 days to control all pitting. Also see paragraph 4.07.

FAULT CURRENT REVIEW FROM ELECTRIC TRANSMISSION LINES

Each new or rebuilt electric transmission line crossing or paralleling the 4-inch feeder main will be evaluated for possible electric current discharge or induced onto the 4-inch feeder main. It will also be evaluated for possible static voltage induced on the 4-inch feeder main.

Special attention to the following will be made:

1) If the electric transmission line parallels within 200 yards.
2) If the line structures' towers have a grounding mate (counter poise).
3) The operating and design voltage.
4) Distance between the towers and the pipeline.
5) Soil resistivities.
6) The testing for electric interference currents will be done with the line operated normal load.
7) A report of each test will be kept on file.

CP VOLTMETER ACCURACY CHECK

Two CP voltmeters readings will be compared to each other. The DC voltage readings must be within 2% of each meter, otherwise the meters will be sent out for calibration. This accuracy check will be done annually and just prior to the April annual CP survey.

COPPER SULFATE REFERENCE CELL ACCURACY CHECK

Two cells will be placed in a plastic container of tap water with a high impedance voltmeter connecting the two cells. The voltage difference between the cells must not exceed 40 mv. If greater than 40 mv, the cells must be cleaned and retested.

STRAY CURRENT CHECK

If a P/S voltage reading indicates unusual characteristics indicating possible stray current. An attempt to identify the stray current source must be done within 90 days. A bond to the source should be avoided. A magnesium ribbon or anode bee is recommended with a directional current blocking device.

RISER PIPING GROUND LINE CORROSION CONTROL

Riser piping will be inspected every 3 years for ground line corrosion and adequate ground line protective coating. If the pipe wrapping is found to be lost or missing, the pipe will be cleaned, primed, and wrapped with an approved gas pipe wrapping 6" above the ground line and below the ground to an acceptable pipe wrapping. The pipe wrapping will be completed within 90 days.

PIPE SUPPORTS INSULATION CHECK

Supports will be checked for adequate electrical isolation every 3 years. If the support's P/S potential is within -200 mv of the pipe's P/S potential, the support insulation shall be replaced.

RECORD KEEPING

The voltmeter and copper sulfate cell accuracy checks will be recorded in the annual CP report. All instrument checks and pipeline reports will be kept on file for the life of the pipeline.

3.09 INSPECTION OF EXPOSED PIPELINE

GENERAL

During the excavation activity, if there is reason to believe that the pipeline could be damaged by the excavation activity, Company personnel will inspect the gas piping as frequently as necessary during and after the activities to verify the integrity of the pipeline.

INSPECTION OF EXPOSED PIPELINE - CORROSION & COATING DAMAGE

When underground piping is exposed the piping will be inspected for adequate coating and a CP potential will be taken. Inadequate coating on the exposed pipe will be repaired. A CP potential more positive than -1000 mv will be investigated before the ditch is backfilled. An exposed pipe report will be made and kept for the life of the pipeline.

INSPECTION FOR INTERNAL CORROSION

Whenever any section of the pipeline is removed for any reason, the internal surface shall be inspected for internal corrosion.

SUPPORTING EXPOSED PIPELINE

The 4-inch pipeline should be supported every 15 feet in open excavations with belts or netting in such a manner as to not damage the pipe coating.

BACKFILLING EXPOSED PIPING

Before backfilling is permitted around the gas pipeline, it shall be inspected by Company personnel. If any kinks, scratches, gauges, dents, or corrosion pits are found, they shall be taken care of per Spec. 3.04. Where another utility crosses under or over the gas pipeline, the gas pipeline should be given a second coating wrap. The existing coating shall be cleaned, primed, and then wrapped. The second wrap will help minimize corrosion causing stray currents. Backfilling shall be done in such a manner so that it will not induce any stress in the pipe. Do not allow any objects (such as rocks) to rest on the pipe or coating. If necessary, pad the pipe with six inches of sand or similar material around the pipe. A minimum clearance of 12 inches, where possible, is required by code between the gas pipeline and any other utility facilities. Backfill under pipe is to be compacted.

3.09 INSPECTION OF EXPOSED PIPELINE (cont'd)

RECORD KEEPING

All gas piping inspections should be recorded and retained for as long as the pipeline remains in service.

6.01 GENERAL

6.01.1 These specifications establish the guidelines that shall be followed during construction of the WORK. ASME B31.8 Gas Transmission and Distribution Piping Systems and the U.S. Department of Transportation Pipeline Safety Regulations Parts 191-192, Washington Utilities and Transportation Commission's Rules WAC 480-93, as applicable, shall be considered part of these Specifications. The rules and regulations of agencies having jurisdiction over the WORK shall be considered part of these Specifications.

6.01.2 The OWNER shall have the right to make any changes necessary to the WORK. If the change results in increasing or decreasing the costs to the CONTRACTOR, the CONTRACT price will be equitably adjusted. Such adjustments must be agreed on and authorized in writing by the qualified professional ENGINEER before that part of the WORK commences.

6.01.3 CONTRACTOR shall be liable for damage to any and all above or below grade existing man-made structures or natural features that may be located within or adjacent to the working area. Caution and due consideration shall be given to the protection and support of such properties and structures.

6.01.4 Specifications not applicable to the project in question should be disregarded.

6.01.5 No additional compensation shall be allowed to the CONTRACTOR for any item in this section, unless specifically noted otherwise.

6.01.6 All pipe and pipeline components used in the construction and repair at the gas pipeline shall be properly marked as to the standard or specification to which it was manufactured.

6.01.7 Prior to putting any new, relocated, or replaced section of pipe into operation, the pipe shall be tested in accordance with CFR 192-503.

6.01.8 At the completion of construction activity, the pipeline records shall be updated within 6 months. The records shall be made available to appropriate personnel.

6.09 TESTING

6.09.1 GENERAL

Upon completion of construction, the CONTRACTOR shall PROVIDE all MATERIALS, EQUIPMENT, and LABOR to pressure test all piping lengths containing field connections.

The details of the pressure and test medium are given on the drawings. The test pressure shall be a minimum of 1217 psig, as designated by CFR 192.619 for pipe installed in class locations 3 and 4.

The WUTC will be notified in writing at least 2 business days prior to any pressure test that will have a MAOP that produces a hoop stress of 20% or more of the SMYS. The appropriate public officials will also be notified prior to the pressure test.

Any pressure test for a pipe segment having a MAOP that produces a hoop stress above 20% of the SMYS will be a minimum of 8 hours in length.

6.09.2 CODES

The CONTRACTOR shall ensure all pressure testing meets the requirements of the latest editions of the Codes outlined in Section 6.02.

6.09.3 WITNESSES

The CONTRACTOR shall notify the ENGINEER at least 72 hours (excluding Sundays and Holidays) in advance of any pressure testing.

6.09.4 REPAIRS

Any leaks which are discovered shall be repaired and the CONTRACTOR shall repeat the entire test. The procedure shall continue until the ENGINEER is fully satisfied as to the pressure tightness of the pipeline.

6.09.5 PURGING

When testing has been completed, CONTRACTORS shall remove all water from the line by pigging, using compressed air to drive the pig.

6.09 TESTING (cont'd)

6.09.6 TEST MEDIUM DISPOSAL

The CONTRACTOR shall be responsible for the suitable disposal of all testing and purging fluids. This disposal shall be to the complete satisfaction of the OWNER, ENGINEER, and all applicable Government Authorities.

6.09.7 RIVER CROSSING

Prior to installation or river crossings, river crossing pipe shall maintain test pressure for a minimum of two hours.

6.09.8 TEST PROCEDURES

If, during the test, the segment is to be stressed to 20% or more of SMYS and natural gas, inert gas, or air is the medium - A leak test must be made at a pressure between 100 psig and the pressure required to produce a hoop stress of 20% of SMYS; or the line must be walked to check for leaks while the hoop stress is held at approximately 20% of SMYS; this pressure test must be maintained for a minimum of 1 hour.

Water acquired by CONTRACTOR for pressure testing must be in a manner suitable to governmental bodies having jurisdiction over these matters. The quality of water pumped into the pipeline shall be filtered to prevent silt and other suspended MATERIALS from entering the pipeline.

The CONTRACTOR is fully accountable to the qualified professional ENGINEER for the testing procedure and any re-test called for by the INSPECTOR will be at the CONTRACTOR'S expense.

CONTRACTOR shall, at all times, retain sufficient manpower and EQUIPMENT on site during pressure testing for the purpose of expeditiously filling, testing. and de-watering pipeline test section.

Upon commencement of the pipeline pressure testing, CONTRACTOR shall work 24 hours a day during testing.

There shall be no pressure cycling in a single test except as required by repair or re-test.

Testing EQUIPMENT used during the test shall only be deemed suitable if accepted by the ENGINEER.

A permanent record of all tests must be presented to the ENGINEER by the CONTRACTOR.

The CONTRACTOR shall SUPPLY an enclosed, weatherproof, properly lighted and heated trailer or skid-mounted building of sufficient size to house instruments and personnel at each test site during the testing program.

All instrument piping must be filled with an anti-freeze solution supplied by CONTRACTOR, if required.

The CONTRACTOR shall have a responsible member of his staff on site during the entire period of the proof test program.

The CONTRACTOR shall SUPPLY calibrated pressure and temperature recorder(s), pressure and temperature gauge(s), and dead weight gauge(s) and all other instruments necessary to carry out the required test(s). Pressure and temperature instruments shall be selected so that the reading occurs between 20 percent and 80 percent of the instruments full range. Chart records shall be continuous and legible over the full test period. All instruments must be in good working order and of a type approved by the ENGINEER. A dead weight gauge must havea certificate of calibration not more than one year old. The calibration report must be made part of the project report.

A caliper pig shall be run by the CONTRACTOR prior to the proof test, and the findings, as interpreted by the ENGINEER, will become part of the acceptance criteria of the WORK. The gauging plate diameter shall not be less than the inside pipe diameter minus .2 inch.

6.09.9 RECORD KEEPING

All data for pressure test performed shall be kept for the life of the pipeline. This data to include information listed under WAC 480-93-170(7).

3.07 EXCAVATION NOTIFICATION HANDLING

1. Notification of proposed excavations will normally be received through a One Call notification system. Occasionally, the excavator may call the Company directly, so the caller should be advised to notify the One Call system.

2. Calls of proposed excavations shall be recorded. The recorded information should include:

   2.1 Caller's name and company.
   2.2 Date proposed excavation activity is for.
   2.3 What the excavation activity is for.
   2.4 Area or location of excavation.
   2.5 Person to contact at site, if any.

   The information can be handwritten or via Fax 509/927-8461. This information should be retained.

3. Upon receipt of the proposed excavation notice, we will provide the excavator with accurate information as to our underground facilities, the excavator is to be provided with the best available information as to their approximate locations. If there are no known Company facilities within the excavation area, the excavator should be advised.

4. The Company shall provide the information within two business days as required by Washington State law. Should circumstances dictate the need for additional time, the Company should meet with the excavator and make a mutually agreeable schedule for the location of its facilities.

5. Locating and marking should be according to the following Spec. 3.08.

6. Field locations of the pipeline shall be recorded. This record shall include the date and time of the field location, by whom, and the information shall be retained.

7. A follow-up inspection of the pipeline will be conducted where there is reason to believe the pipeline could be damaged.

3.10 ODORIZATION

GENERAL

This section covers the requirements for odorizing natural gas. Procedures for testing and reporting odorant in the natural gas system and methods for neutralizing mercaptan odorant are covered in this section.

BASIC REQUIREMENTS

Paragraph 192.625 of the Federal Pipeline Safety Regulations, Part 192, requires that all gas distributed must possess a distinctive odor, to the extent that at a concentration in air of one-fifth of the lower explosive limit (approximately 1 percent gas in air), the gas is really detectable by a person with a normal sense of smell. However, the gas industry has used a standard of .25 per cent or less gas in the air to be readily detectable. A second industry standard is the injection rate should be between 1/4 and 3/4 pounds of odorant per million CF computed monthly. The odorizer must introduce the odorant without wide variations in the level of odorant.

INSPECTION

The odorizer shall be inspected monthly and the odorant level recorded. This inspection date should correspond with WGP Company's meter reading date.

DETERMINATION OF ODORANT INTENSITY

1. The monthly inject rate (pounds per million cubic feet of gas) and a running 12-month average injection rate shall be calculated. These calculations are done by dividing the month odorant usage by the same periods gas purchases; for a 12-month rate, the total odorant used for the previous 12 months is divided by the total gas purchases for the previous 12 months.

2. Odorant level is measured at the plant with a:

   Health Consultants, Inc.
   Model 5637 Odorator

3. The odorator instrument will be calibrated on an annual basis.

RECORDS

All records shall be maintained so that the same are available for access for a period of five (5) years.

2.4 Response to Notification of a Leak

When a leak is reported, response personnel will respond to the site of the reported leak, evaluate the situation, and secure the area as needed. He/They will then proceed to Williams Gas Pipeline (WGP) meter station and close the pipeline Emergency Response valve ahead of the regulators.

While the shift supervisor is completing the above, the boiler house operator will switch over to the Avista gas supply line.

All leaks detected coming from a foreign source will be reported immediately to the foreign source operator.

The shift supervisor will notify the ``caller'' of the leak investigation results.

3.02 INVESTIGATION OF FAILURES

Definition of a failure: any gas system leak, evidence of corrosion, accident, incident, dig-in, pipe, construction or equipment failure, blowing relief valve.

OBTAIN EVIDENCE

1. Take a sufficient number of photographs of the accident or incident scene if at all possible. Photograph any pertinent subject. Label photographs and include with written report.

2. Any suspected gas facility involved in the incident will not be removed until the commission or lead investigative authority has designated the release of the gas facility. For example: Damaged section of gas main or valve, etc. This is to include Company property which may have been defective, such as the split seam on the gas main or failed regulator.

3. Obtain any newspaper clippings concerning the accident or incident.

4. Document all pertinent events preceding, during, and following the accident or incident, as soon as possible, to insure that important items are not omitted; i.e., in case of a dig-in was a "locate" requested, was the main located properly, were locate paint marks still visible?

5. A follow-up inspection with a combustible gas detector will be conducted to all repaired leaks no later than 30 days following the repair. The combustible gas detector will be calibrated monthly as per manufacturer's recommendation.

ANALYZING ACCIDENTS AND INCIDENTS

1. All material collected per above and reports will be forwarded to the General Manager for further processing.

2. All communications to the news media, county, state, and/or federal agency will be handled as prescribed in the "EMERGENCY RESPONSE MANUAL."

3. The General Manager will obtain any scientific data, laboratory tests, or secure any expert investigators if deemed necessary by the Company.

4. The General Manager shall circulate or publish any recommendations concerning the accident or incident with the aim of preventing any recurrences.

4.02 LEAKAGE SURVEYS

GENERAL

The pipeline shall be leak surveyed with "leak detection" equipment each calendar year (not to exceed 15 months). This may be combined with one of the twice yearly patrols. This survey should be done with the fall patrol.

LEAK SURVEY PLAN

Gas leakage surveys shall be done on relatively calm days and free of rain showers. A continuous sampling of the atmosphere at no more than two inches above the ground surface and adjacent to above ground gas facilities with a gas detector system capable of detecting a concentration of 20 PPM or more of gas in air at any sampling point. The gas detector will be calibrated within a 90 day period using 50 ppm test gas.

An electronic or flame ionization leak detection unit, in general, cannot pinpoint an underground gas leak. The reason is that the units are too sensitive. A relatively small leak will cause a full scale reading.

A combustible gas indicator (CGI) shall be used to pinpoint subsurface leak indications.

The ethane detector can be used when the gas indication is believed not to be natural gas. Sewer gas has no ethane, natural gas does have a varying amount of ethane. The ethane detector can be used only when the gas reading on a CGI is above 5 per cent gas.

LEAKAGE CLASSIFICATION

Leak indications are classified by Grade 1, 2, or 3 and define in WAC 480-93-186 rule. For ease of use, the WAC grade designations are repeated here.

Grade 1 means a leak that represents an existing or probable hazard to persons or property and requiring immediate repair or continuous action until conditions are no longer hazardous.

Grade 2 means a leak recognized as being nonhazardous at the time of detection but requiring scheduled repair based on probable future hazard.

Grade 3 means a leak that is nonhazardous at the time of detection and can reasonably be expected to remain nonhazardous.

EMERGENCY RESPONSE MANUAL

INDEX

Revised 2/27/08

6.0 Emergency Contract Crew

- 6.1 Purpose
- 6.2 Call Out
- 6.3 On Site

7.0 Emergency Telephone Contacts

- 7.1 Key Emergency Resources
- 7.2 Company Personnel
- 7.3 Contractor Personnel
- 7.4 Resident Contact
  - 1) Resident Map
  - 2) Resident Phone List
  - 3) Evacuation Procedure
  - 4) Evacuation Notice
  - 5) Courtesy Notice
- 7.5 Government Contacts

8.0 Equipment Check Lists

- 8.1 Pre-Tested Repair Pipe
- 8.2 Pipe Fitting
- 8.3 Miscellaneous Equipment

9.0 Odorant Spill or Leak

- 9.1 Scope
- 9.2 Material Property and Safety Data Sheets
- 9.3 Odorant Spill
- 9.4 Odorant Leak
- 9.5 Emergency Response Sign
- 9.6 Reynolds Odor Buster

10.0 Emergency Notices & Report Forms

- 10.1 Telephonic Notices
- 10.2 Written Reports
- 10.3 Accident Reports
- 10.4 Evacuee Registration Form

11.0 Emergency Exercises

- 11.1 Response Exercises
- 11.2 Equipment Exercises
- 11.3 Manual Acknowledgement
- 11.4 Manual Distribution List
- 11.5 Review - Emergency Response

INITIAL
NATURAL GAS LEAK REPORT

DATE _____

TIME _____

1) Where was the person located when he discovered (smelled) the leak? _____

2) Caller's Name _____

Address _____

Telephone No. _____

3) Nature of Reported Leak:

Dig-in _____

Smelled natural gas _____

Leak indication (from leak surveyor) _____

_____

Fire or explosion _____

4) Location of the leak:

Distance and direction from road or significant landmark. _____

5) Are there any injuries? _____

_____

6) What caused the leak? _____

_____

7) Wind direction and velocity: _____

8) Time gas shut-off: _____

9) Call received by: _____

10) Response: _____

Revised 2/27/08

2.5 GAS LEAK RECORDS REPORT

Date and Time:
a. Leak was reported _____
b. Investigated _____
c. Repaired _____

Name of employee(s) conducting the investigation:

_____ _____
_____ _____

Location of the leak (sufficiently described to allow ready location by other qualified personnel)

_____

_____

_____

Leak Grade; refer to section 1-2

_____

Pipeline Classification

_____

Caller's Name: _____
Address _____
Phone number _____

Component that leaked _____

_____

_____

Size and material that leaked _____

_____

Pipe Condition _____

_____

Type of Repair _____

_____

_____

Leak Cause _____

_____

_____

Date Pipe Installed _____

Magnitude and location of CGI readings _____

_____

_____

Unique identification numbers of leak detection equipment _____

_____

POLICY NO. 7

GAS OPERATION AND MAINTENANCE PLAN

2.07 LEAKAGE SURVEYS

SCOPE

To describe the standard practice for conducting leakage surveys.

POLICY

All leakage surveys shall be conducted in accordance with the requirements as set forth in this policy.

PROGRAM

The feeder main system as described in paragraph 1.01 shall be leak surveyed at least once each calendar year (not to exceed 15 months), according to Company procedures. The leakage survey shall be expanded to include normal patrolling requirements.

RESPONSIBILITY

The Power Plant Superintendent shall be responsible for the execution of leakage survey programs together with the records of such surveys.

RECORD KEEPING

All records of leak surveys shall be kept for a minimum of 5 years.

4.01 PATROLLING

GENERAL

The pipeline shall be patrolled at least twice each calendar year (not to exceed 7 1/2 months). Each pipeline road crossing shall be patrolled at least four times each calender year (not to exceed 4-1/2 months).

PATROLLING

The purpose of patrolling is to observe surface conditions on and adjacent to the Company's rights-of-way for indications of leaks (vegetation leakage survey), construction activity, new dwelling units or proximities, washouts, land subsidence, missing/damaged pipeline warning markers, and other factors affecting safety, operation, or property.

1. The pipeline right-of-way corridor for ground patrol is shown on gas transmission line "as built" drawing sheets 3 of 3.

2. No new buildings are permitted within the pipeline right-of-way.

3. Leakage survey by vegetation survey. This survey should be done in the spring when new growth is green. Leaks may be identified by:

a. Dead or very green vegetation

b. A bald spot - no vegetation

c. Soil discoloration

d. Odor of odorized natural gas

e. Bubbles in water

f. Large number of dead insects near the pipeline

4. Line markers (signs) shall be maintained as shown on the pipeline, "as built" drawing sheets 3 of 3. Additional signs shall be added where a need arises. Added markers are to be posted to the maps. Missing or damaged line markers will be replaced within 45 days.

RESPONSIBILITY

The Power Plant Superintendent shall be responsible for correcting all deficiencies within 30 working days. A record of each patrol shall be retained for as long as the pipeline remains in service.

4.05 VALVE INSPECTIONS

GENERAL

The designated Emergency Response valves shall be inspected and partially operated once each calendar year (not to exceed 15 months). The Emergency Response valves are as follows: the two 6-inch ball valves immediately upstream of the 22 psi relief valve, the 4-inch ball valve immediately upstream of the 165 psi relief valve, and the 2-inch ball valve immediately upstream of the working monitor regulators at the WGP station.

Any valve found inoperable will have prompt remedial action taken or an alternative valve will be designated.

An appropriate tag shall be maintained on these three valves, designating these valves as Emergency Response valves.

RECORD KEEPING

Records shall be kept of each valve inspection for as long as the line remains in service.

POLICY NO. 1

GAS OPERATING AND MAINTENANCE PLANS

2.01 COMPLIANCE WITH STATE RULES AND REGULATIONS AND MINIMUM FEDERAL SAFETY STANDARDS

SCOPE

To specify the Rules, Regulations, and Codes which shall govern the construction, testing, operation, and maintenance of the Company's natural gas facilities.

POLICY

The Natural Gas Pipeline System shall be constructed, operated, and maintained in compliance with the provisions of the "Minimum Federal Safety Standards," Part 192, CFR 49 as issued and amended by the Office of Pipeline Safety, U. S. Department of Transportation, with the additional provisions of the Washington Utilities and Transportation Commission's "Gas Companies Safety" Chapter 480-93 Washington Administrative Code as issued and amended; and with IEP Company's Gas Operating and Maintenance Plan.

Should any Company plans or state rules and regulations conflict with standards established by the Federal Government, then the Federal Government standards will be controlling until such time as these plans or rules are amended.

A written request shall be filed with the commission prior to operating the pipeline above 250 psig.

RESPONSIBILITIES

The Power Plan Superintendent shall be responsible for providing compliance by Company employees and contractors. He shall also be responsible for the composition and publication of Company Operating and Maintenance Plans; and their periodic updating to reflect changes in policy, rules and regulations, and/or Code requirements. He shall establish design, construction, operation and maintenance standards which shall be adhered to by employees, contractors, or consultants, communicate to all affected personnel changes in design and operating requirements resulting from revisions in rules and regulations or codes; and shall review field operations and reports to provide compliance and determine need for revision of standards. He shall be responsible for adequate training of employees engaged in natural gas operations on a timely basis. Qualified gas people from outside IEP shall be used for training when needed.