Agenda Date: August 9, 2012

Item Number: A1

Docket: PG-110017

Company: Georgia-Pacific Consumer Products (Camas) LLC

Staff: Joe Subsits, Chief Pipeline Safety Engineer

Don Trotter, Assistant Attorney General

Recommendation

Approve the Order Accepting Agreement and Closing Docket, filed July 17, 2012, with Georgia Pacific Consumer Products (Camas) LLC to resolve issues arising from the staff's July 2011 natural gas pipeline inspection.

Discussion

Georgia-Pacific Consumer Products (Camas) LLC (company or GP) owns the Georgia Pacific Camas Pipeline (GP Pipeline). The GP Pipeline is 1.68 miles long, and it serves GP Camas Mill. The GP Pipeline transports natural gas from the Williams Pipeline to the Camas Mill. The Camas Mill is the only customer served by the pipeline. The company reconstructed the GP Pipeline because a state highway project required the pipeline be moved.

This docket involves a Commission staff (staff) inspection of the GP Pipeline in 2011. As a result of that inspection, staff identified 33 categories of violations of state Pipeline Safety Rules. About half the violations relate to issues associated with the recent pipeline reconstruction. Other issues identified during the inspection included findings related to GP's public awareness program and the adequacy of GP's operating and maintenance procedures.

The company responded to staff findings and worked with staff to address them. On July 17, 2012, the parties filed a Stipulated Agreement to Close Docket (Agreement).

Part III of the Agreement contains key conditions. One of these conditions (Section III, item 3) refers to a specific list of action items which are contained in Appendix A to the Agreement. Appendix A identifies the specific actions that staff has confirmed GP has taken and will take by August 31, 2012, to address each of the issues staff has identified. Appendix A also refers to a status report staff filed on July 17, 2012, which contains additional details on the alleged violations and the actions GP agrees to take, many of which staff has confirmed GP has taken.

The company can correct many of the alleged violations, but not all. An example of the latter category relates to GP's inability to provide staff with records indicating that certain construction personnel were formally qualified under applicable rules. The Agreement addresses this issue by requiring GP to change its operating and maintenance manual to prevent this from reoccurring (Section III Parts 2 & 4), but it also requires GP to perform more frequent leak surveys (section III, Part 5) and inspect the pipe using an in-line inspection tool (Section III, Part 7). These are reasonable conditions because the pipe passed a hydrotest after construction was complete.

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Recommendation

Staff recommends the Commission approve the Stipulated Agreement to Close Docket filed July $17,\,2012.$