



8113 WEST GRANDRIDGE BOULEVARD, KENNEWICK, WASHINGTON 99336-7166

February 12, 2016

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

Subject: WAC 480-93-020 – Request for Approval – Kitsap Phase 4

Dear Mr. Rathbun:

Pursuant to the requirements of WAC 480-93-020 Proximity Considerations, Cascade Natural Gas Corporation (CNGC) requests approval to operate a proposed new twelve inch pipeline at a Maximum Allowable Operating Pressure (MAOP) of 499 psig within 100 feet of existing structures intended for human occupancy.

Proposed Scope of Work:

The new 20,500 foot segment of 12-inch pipeline, named Kitsap Phase 4, will be located in rural Mason County about 2 miles northeast of Shelton, WA. Approximately 6,212 feet of the pipeline will be installed in a previously established 50 foot wide pipeline easement paralleling Cascade's existing 8-inch Kitsap Peninsula Transmission Line. The remaining 14,288 feet of the pipeline will be installed in a newly established pipeline easement that varies between 30 feet and 60 feet in width. The 12-inch pipeline will begin at a new valve, CNGC 12-inch valve V-117, to be installed as part of a new valve station adjacent to existing CNGC 8-inch valve V-004 and terminate at existing CNGC 12-inch valve V-043, thereby connecting to the existing 12-inch Kitsap Peninsula Phase 1 Pipeline. The new valve station will connect the new 12-inch Kitsap Phase 4 Pipeline to the existing 8-inch Kitsap Peninsula Transmission Line, which operates at an MAOP of 499 psig. Approximately 16,491 feet of the new pipeline will be installed using standard excavated trench and 4,009 feet will be installed using horizontal directional drilling. The complete route is depicted on the attached aerial map, titled Kitsap Phase 4 – Project Route (Figure #1).

The proposed 12-inch pipeline will be designed with a minimum component rating of 720 psig and will be pressure tested to a minimum of 1080 psig following Cascade's established testing procedures, in order to equal design and testing specifications of previously installed Kitsap Phase 1, 2, 3, and 6 pipelines, which will ultimately connect together to form one continuous

pipeline system. The MAOP of the new 12-inch pipeline will be 499 psig. At the proposed MAOP of 499 psig, the maximum stress level of the pipe and pipeline fittings will be 16.31% of the specified minimum yield strength. Thus, the pipeline will be classified as high pressure distribution main. There will be 100% NDT performed on the facility.

Specifications of the 12-inch pipeline are as follows:

- 16,491 feet of 12" x 0.375" API 5L Grade X-52 steel line pipe with fusion bonded epoxy coating.
- 4,009 feet of 12" x 0.375" API 5L Grade X-52 steel line pipe with fusion bonded epoxy coating and abrasion resistant overlay.
- All fittings (elbows, tees, caps, etc.) will be a minimum standard weight, ANSI 16.9 WPHY-52.
- All components (valves, line stoppers, etc.) will be ANSI Class 300 with a maximum working pressure rating of 720 psig.

Proximity:

The proposed pipeline will be installed within 100 feet of the following building as shown on Figure 2:

- 21 feet from existing cabin at 110 E. Tintagel Pl., Shelton.

It is not possible to increase the distance between the proposed pipeline and the building at this location due to a requirement imposed by the land owner that the pipeline easement follow existing established roadways on the property.

Alternatives:

Cascade reviewed alternative routes and concluded that no other practical safer routes exist to connect these pipeline systems. The alternative to the chosen route would have been to utilize the existing corridor currently occupied by the 8-inch Kitsap Peninsula Transmission Line for the entire route. This would have taken the new 12-inch pipeline through the Lake Limerick development and in close proximity to many homes and recreation areas.

Closing:

Cascade respectfully requests your approval to move forward with the installation of the proposed 12-inch Kitsap Phase 4 project which is scheduled to begin construction on April 4, 2016. If you have any questions or require additional information, feel free to contact me at (509) 734-4576 or via email at mike.eutsey@cngc.com

Sincerely,
CASCADE NATURAL GAS



Mike Eutsey
Manager of Standards & Compliance

CC: Eric Martuscelli
Steve Kessie
Jeremy Ogden

Enclosures