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May 5, 2010

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WUTC
Pipeline Safety Division

Stephanie Zuehlke
Pipeline Safety Engineer
Washington Utilities and Transportation
1300 S. Evergreen Park Dr. SW
PO Box 47250
Olympia, WA 98504-7250

RE: PG-082195 Cascade Natural Gas Procedures Related to Jeeping

Dear Stephanie,

Per our telephone conversation today, this letter is intended to clarify Cascade's procedures related to jeeping of coated, steel pipelines. Cascade CP 605 (Steel Gas Main and Lateral Construction) section .0491 states that all pipe 4" and larger will be jeeped, and pipe less than 4" will be visually inspected. The procedure *implies*, but doesn't specifically state, the jeeping will be accomplished with electronic jeeping equipment. Generally our past practice has been to use a jeeping machine for 4" and larger main extensions, but we have occasionally "hand jeeped" (using no machine) short lengths of pipe. Going forward we will jeep, with a jeeping machine, all new coated steel pipe 4" and larger.

Additionally, as a part of our integration process, we will likely be changing from our current coating (extruded polyethylene) to fusion bonded epoxy. If and when this occurs, our jeeping procedure will also likely change. The final procedure is dependent on acceptance and approval by all MDU utilities, but it will likely include using a jeeping machine for all coated, steel pipe, regardless of diameter.

If anything further is required to close this issue, please let me know. Thank you.

Sincerely,

Chanda Marek, PE
Manager, Operations Services