POST INSPECTION MEMORANDUM

Inspector: Al Jones/WUTC
Reviewed: Joe Subsits/WUTC
Peer Reviewed: _____
Follow-Up Enforcement: No Violation
PCP* PCO* NOA WL LOC
Director Approval* _____

Date: December 28, 2011

Operator Inspected: **OPID: 15014** **Region:** Western
Gas Transmission Northwest Corporation (GTN)
U.S. Western Pipe Region
1400 SW 5th Ave
Suite 900
Portland, OR 97201

Unit Address:
Rosalia District
201 West North River Drive
Spokane, WA 99201

Unit Inspected: Rosalia District **Unit ID:** 66685
Unit Type: Interstate Natural Gas
Inspection Type: Standard Inspection
Record Location: Spokane, WA
Inspection Dates: November 28 – December 2, 2011
AFOD: Four
SMART Activity Number:

Operator Contact: Kurt Smith, Pipe Regulatory Specialist
Phone: (509) 533-2831 **Fax:** (509) 546-8825 **Emergency:** (800) 447-8066

Unit Description:
The Rosalia District is located in Eastern Washington in Spokane and Whitman Counties; extending south from the Idaho/Washington border to the Snake River crossing. The pipeline is approximately 100 miles in length. The transmission lines are primarily in Class-1 Location, except the Spokane Valley with about 14 miles of Class-2 Location and about 7 miles of Class-3 Location. The District includes a compressor station at Rosalia, various main line block valves, CP test sites, and rectifier stations.

Facilities Inspected:
The portion of the District inspected include the 36-inch (A-Line) and two 42-inch (B-Line and C-Line) diameter pipelines from the Washington/Idaho border (MP 106.8) to the Spokane Gate Station (MP 108.2). This fall about 3,600 linear feet of the A-line located at Saltese Meadows in Spokane Valley was removed and replaced with a new 36-inch diameter pipeline with FBE coating in a Class-3 Location. The A and B Lines extents south from the Spokane Gate to the Snake River (MP 206.7). The Rosalia Compressor Station contains a Mars Solar (14K Hp), Titan Solar (19.5 Hp), and a LM-1500, GE (12.5 Hp) turbines. Meter Stations located at Spokane, Mica, Spangle, Rosalia, and St. John were inspected for set points, lockup, MAOP, and security. Right-of-way inspection for signage, cathodic protection test sites, casings, and rectifier units. See attached Field Data Report.

Persons Interviewed:

Kurt Smith	Pipe Regulatory Specialist	(509) 533-2832
John Plaster	Area Manager	
James Olson	Rosalia Technician	(509) 533-2831
Patrick Brown	Rosalia Technician	(509) 533-2832
Rich Christman	Corrosion Specialist	(208) 265-2164

Probable Violations/Concerns:
One probable violation for not taking prompt remedial (192.465(d)) action to correct the pipe-to-soil potential with respect to the native potential.
During the annual surveys for 2010 and 2011, the pipe-to-soil "off" potential was less than 100 mV with respect to the native potentials for the following locations:
At MP 110.2 the native potential is -698 mV and 2010 P/S was -669 mV and 2011 P/S was -748 mV, and
At MP 110.8 the native potential is -708 mV and 2010 P/S was -640 mV and 2011 P/S was -792 mV.

Follow up on the history of prior offenses that are still open:

Prior Offenses (for the past 5 years)		
CPF #	**What type of open enforcement action(s)?**	**Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)**

Recommendations:
Maintain normal inspection cycle and warning letter be submitted for the one probable violation. Also recommend that a follow up inspection be conducted to confirm that the probable violation has been corrected.

Comments:
The B-Line casing potential at MP 112 has a greater potential than the pipe-to-soil potential. Additional evaluation is required to identify if anodes are attached to the casing. The casing is located at an abandoned railroad track and is adjacent to a new housing development. Rich Christman, Corrosion Specialist, is new to the District and has been working on evaluating the casing. The operator has provided additional documentation following this field inspection that states the casing was evaluated in 2009 and concluded that casing is not shorted to the carrier pipe because the casing values did not shift during the ON/OFF survey. The B-Line is not piggable because of reduced pipe size at the Snake River crossing. Future inspection need to monitored casing data and encourage the Operator to remove the casing.

Attachments:
PHMSA Form 1 - Standard Procedures/Standard Inspection
PHMSA Form 13 - Pipeline Drug &Alcohol Questions
PHMSA Form 15 - OQ Field Inspection Protocol
PHMSA Form 16 - Gas IMP Field Verification Inspection
PHMSA Form 17 - Supplemental SCC Questionnaire Gas Transmission or Liquid Pipeline
Form W - Public Awareness Program Field Audit 1162
Western Region Unit Information Form
Field Data Collection Form
WUTC Data Request #2 – Reply from GTN
Violation report

Version Date: 5/5/08