

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

A completed **Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Docket Number	110020		
Inspector Name & Submit Date	Stephanie Zuehlke / June 2, 2011		
Chief Eng Name & Review/Date	Joe Subsits / June 3, 2011		
Operator Information			
Name of Operator:	Cascade Natural Gas Corporation	OP ID #:	2128
Name of Unit(s):	Whatcom County		
Records Location:	CNG Bellingham Office		
Date(s) of Last (unit) Inspection:	September 21-25, 2009. Formal exit 10.30.09.	Inspection Date(s):	April 4-6 & 12-14, 18-21, & 26, 2011 Formal exit 04.21.11

<p>Inspection Summary: CNG Natural Gas Transmission and Distribution for Whatcom County – Std. incl. PA, D/A, IMP, & OQ. 03.25.11 phone conversation w/Tina: requested: 1) Annual capacity/reg review 2) Farm taps 3) Rick is providing Ferndale origination docs.</p>

HQ Address: 8113 W. Grandridge Blvd. Kennewick, WA 99336	System/Unit Name & Address: Bellingham District – Whatcom County 910 Racine St., Bellingham, WA 98229	
Co. Official: Tim Clark Phone No.: 509.734.4586 Fax No.: 509.737.9803 Emergency Phone No.: 888.522.1130	Phone No.: 360.733.5981 Fax No.: 360.733.1416 Emergency Phone No.: 888.522.1130	
Persons Interviewed	Title	Phone No.
Rick Kelln	GM – District Operations	360.201.4440
Tina Beach	Regulatory Compliance Mgr.	(509) 734-4576 office & (206) 445-4121 cell
Mark Wolfe	Operations Programs Administrator	509.438.4223
Kathy Bergner	District Manager	360.788.2345 office & 360.201.0671 cell
Mike Eutsey	Pipeline Safety Specialist	509.438.5179
Patti Chartrey	Pipeline Safety Specialist	206.225.8510
Joel Johnstone	(Division Welding)	

WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection. (check one below and enter appropriate date)			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
x	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	01.22 - 25.09

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

GAS SYSTEM OPERATIONS

Gas Supplier		Williams and West Coast Energy			
Services:					
2009:		<i>Residential</i> 40,483	<i>Commercial</i> 4975	<i>Industrial</i> 219	<i>Other</i> = 45 K Total
2011:		<i>Residential</i> 45532	<i>Commercial</i> 4860	<i>Industrial</i> 57(per Emergency shut-down manual)	<i>Other</i> 0 = 50449 Total Svcs.
Number of reportable safety related conditions last year 0 in 2009 / 0 in 2010		Number of deferred leaks in system 4 in 2009 / 3 new deferred in 2011 No carry over into 2011 from prior years.			
Number of <u>non-reportable</u> safety related conditions last year 0 in 2009 / 0 in 2010		Number of third party hits last year Calendar Yr. 2009 Inspection =57 2010 = 16			
<p>Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) <u>2009 Total = 44Miles Class 3&4 = 0 miles ; 2011 Total = 43.94 Miles Class 3 & 4 = 0 miles.</u> If no Class 3 or 4 then must be Class 1 and/or Class 2. Review class location maps for 2009 , 2010, and 2011 and <u>required study showing changes in class location per 192.609 & 192.611</u> <u>Tina requesting from Mike Hardesty in Engineering:</u> <u>IMP Plan and Class loction maps are to identify Class locations.</u></p>		<p>Miles of main within inspection unit(total miles and miles in class 3 & 4 areas) <u>2009 Total Miles in Whatcom Co = 1500 Miles Dist. Per CNG, all Designed to Class 4;</u> 2011 Total Miles in Whatcom Co = 1554 Class 3 & 4 = 831miles Class location identification completed? CNG again stated that systems are designed to Class 4 requirements: Designed to Class 4 but operated at requirements of Class 1, 2, 3. <u>Tina providing class location map information:</u></p>			
<p align="center">Operating Pressure(s):</p> <ol style="list-style-type: none"> REVIEW ZONEs/CLASS for below lines in 2011 Any moving or lowering or location change of any of the below since establishing MAOP? Rick identified no moving or lowering of lines listed below regarding location for at least the last 12 years and not since they were installed. <ol style="list-style-type: none"> Change study completed per 192.609 & 192.611? Any depth of transmission monitoring since last write up? Rick is providing copies of records. 		MAOP (Within last year)		Actual Operating Pressure (At time of Inspection)	
Feeder:	16" North Whatcom Transmission Line 10-	43,907'	600	527 – R-116	Outlet
2009	8" Kickerville Transmission Line 11-	17,266'	600	515 – R-26	Inlet
	12" Grandview Road Transmission Line 13-	7,636'	600	522 – R-137	Inlet
	4" West Lynden Transmission Line 16-	1,315'	600	494 – R-82	Inlet
	20" Ferndale Transmission Line 18-	27,904'	600	527 – Tap Line 10	
	20" Sumas Transmission Line 19-	17,121'	800	613 – R-116	Inlet
	8" South Kickerville Transmission Line 20-	7,108'	600	510 – R26	Outlet
2011	16" North Whatcom Transmission Line 10-	43,907'	600 (inlet is 520 – 500 low psig Depot Rd @ R-65)	520 – R116	Outlet (04.11.11)
	8" Kickerville Transmission Line 11-	17,266'	600 R-26 high 520psig low 480 at inlet.	xxx – R26	Inlet
	12" Grandview Road Transmission Line 13-	7,636'	600	xxx – R137	Inlet
	4" West Lynden Transmission Line 16-	1,315'	600	xxx – R82	Inlet
	20" Ferndale Transmission Line 18-	27,904'	600	xxx – Tap Line 10 (Tap off 16" line #10)	
	20" Sumas Transmission Line 19-	17,121'	800	xxx – R116	Inlet
	8" South Kickerville Transmission Line 20-	7,108'	600	xxx – R26	Outlet

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

GAS SYSTEM OPERATIONS

Town:	Acme	60	23
2009	Bellingham – 4 distr. systems pressures	60	55
		58	55
		34	31
		27	14
	Blaine	60	57
	Deming	60	29
	Everson – 2 distr. systems pressures	60	26
		44	41
	Ferndale	58	55
	Lawrence	60	36
	Lynden	60	57
	Nooksack	60	41
	Sumas	40	32
2011	Acme	60	xx
	Bellingham – 4 distr. systems pressures	60	xx
		58	xx
		34	xx
		27	xx
	Blaine	60	xx
	Deming	60	xx
	Everson – 2 distr. systems pressures	60	xx
		44	xx
	Ferndale	58	xx
	Lawrence	60	xx
	Lynden	60	xx
	Nooksack	60	xx
	Sumas	40	xx
Other:	Distribution Lines see above towns (multiple stations) – Ranges	60psig – 27psig	14psig – 57psig
Does the operator have any transmission pipelines?		Yes see above.	
Compressor stations? Use Attachment I.		None in Whatcom County	

Pipe Specifications:

Year Installed (Range)	Pre-1955-2011	Pipe Diameters (Range)	5/8"-20"
Material Type	Steel PE	Line Pipe Specification Used	API 5L & ASTM 2513
Mileage	1544 miles Total-unverified	SMYS %	40% Class 2 location - 20" Sumas Transmission line 19 and Operating at its MAOP. - 780psi (Further detailed actual operating press reported at time of inspection = 613psig for Sumas.)

Operator Qualification Field Validation

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at <http://primis.phmsa.dot.gov/oqdb/home.oq> **Date Completed** 06.08.11

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Integrity Management Field Validation

Important: Per PHMSA, IMP Field Verification Form (Rev 3, March 09) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at <http://primis.phmsa.dot.gov/gasimp/home.gim> **Date Completed:** 06.08.11

REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates.	x			
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?	x			
3.	191.5	Any incidents requiring telephonic reporting to the NRC (800-424-8802) SZ 965387 AJ 967072	x			
4.	191.15	Written reports; supplemental reports to PHMSA (Form F7100.2)				
5.	191.23	Filing the Safety Related Condition Report within 5 days of determination, but not later than 10 days after discovery None	x			
6.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports	x			
7.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				
8.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization;	x			
9.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; 2 in Whatcom County	x			
10.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas;	x			
11.	480-93-200(1)(d)	The unintentional ignition of gas;	x			
12.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;	x			
13.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; 2010 & 2011 R-19 Telegraph Rd. and James St. in Whatcom County. Mooney's on order for this location.	x			
14.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection;	x			
15.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
16.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;	x			
17.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service;	x			
18.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or	x			
19.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP	x			
	480-93-200(3)	(3) Routine or planned maintenance and operational activities of the gas pipeline company that result in operator-controlled plant and equipment shut downs, reduction in system pressures, flaring or venting of gas, and normal leak repairs are not reportable items under this section.				
20.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

REPORTING RECORDS			S	U	N/A	N/C
21.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	x			
22.	480-93-200(4)(b)	The extent of injuries and damage;	x			
23.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;	x			
24.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;	x			
25.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	x			
26.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	x			
27.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	x			
28.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	x			
29.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	x			
30.	480-93-200(4)(j)	Line type;	x			
31.	480-93-200(4)(k)	City and county of incident; and	x			
32.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	x			
33.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	x			
34.	480-93-200(6)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure None	x			
35.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
36.	480-93-200(7)(a) PV	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety Provided late 04.01.11		x		
37.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
38.	480-93-200(7)(b)(i) PV	Number of gas-related one-call locate requests completed in the field; Provided late 04.01.11		x		
39.	480-93-200(7)(b)(ii) PV	Number of third-party damages incurred; and (Provided late 04.01.11)		x		
40.	480-93-200(7)(b)(iii) PV	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other. Provided late 04.01.11		x		
41.	480-93-200(7)(c) PV	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. Rick identified zero construction defects and material failures in Whatcom. Provided late 04.01.11		x		
42.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities jRecieved a copy of Rick's 01.2011 contact list. Tina providing contact update sent via email.	x			
43.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	x			
44.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	x			

Comments:

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

--	--	--	--	--	--

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
45.	192.16 AOC	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator CNG states that they send but still no way to track and no records to prove they were provided. New plan is to notify all customers in April of 2011 (sent out) of their responsibility re: piping. They are presently considering sending out notification in <u>all</u> future bills as either a stuffer or on the bill itself but no final decision yet.		x		
46.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	x			
47.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate?	x			

Comments:

AOC: 192.225: No procedure for: Which NDT procedures followed for use prior to transmission branch/fitting/etc. I asked for the procedure for this process. Mike Eutsey is checking with division. Division Construction Services completes NDT prior to welding but no Procedure in manual which identifies NDT. Mike Eutsey stated, "yes, I think we are doing it but No we don't have a procedure to describe it." All per Bill Danko.

Procedures correction needed: CP 760.071 – Under welding procedures refers to "Figure 11". But "Figure 11" is for a Guided Bend Test Specimen not welding procedures.

Procedure clarification: Welding Cycle test requirements on page 42 Figure B: There is an asterisk in Table but no note associated w/* to ID the meaning. Mike E. identified it is included in the language of Note 2 but he also identified that they will clarify this procedure.

CONSTRUCTION RECORDS			S	U	N/A	N/C
48.	480-93-013	OQ records for personnel performing New Construction covered tasks 1. 2008 records unavailable for Gordon Van Corbach Field Facilitator, Ed White Division Supt, Dale Savard comb. Welder, and Steve Vance Backhoe operator. (Requested these records due to State & Franklin leak work) 2. 2011 records provided do not indicate dates of qualification/tests, etc. only that they are qualified and what they are qualified for. Rick is looking for other records that show dates. Next set of Energy World records provided show OQ expirations for employees.	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CONSTRUCTION RECORDS		S	U	N/A	N/C
49.	<p>Test Results to Qualify Welding Procedures CNG provided a coupon & boot/seal Any new welding procedures? They identified no new procedures. 192.471(a)-(c). External corrosion control: test leads. Don't find a Procedure for attachment of coupons with CP test leads to pipe? How do you attach? Does the procedure minimize stress concentration on the pipe? CP 610.033 states: .033 Test Station Markers – CNG part H-105</p> <ol style="list-style-type: none"> Refer to Pages 8 thru 10 for illustrations H-105 are to be buried with the depth line at grade, not driven into the ground. Use the same instructions as H-99 for offsetting and picking locations for the test station marker. Lead wires shall be brazed to the pipe or casing, or to a coupon welded to the pipe. Coupons shall be used for high pressure line attachments. Cad welding is not acceptable. For installations without casings, both wires shall be attached to the pipe. Do not attach them together. They should be separated by about 12". Prime and wrap. For casings, the black wire should be brazed to the casing pipe approximately 6" from the end of the casing, and then primed only. The white wire should be brazed to the carrier pipe approximately 12" from the casing, and then primed and wrapped. Wire attachments: Wires should be looped around the pipe before brazing, and there should be approximately 12" of slack in the wires. If wires need to be extended, use standard 14-gauge tracer wire (CNG part H-115) and standard direct burial splice kits. Before and after backfilling, test continuity. <ul style="list-style-type: none"> No procedure for welding coupon/test leads; No specification of coupon material. Bill Danko identified that they normally weld on when pipe is new (prior to commissioning?) Copy of coupon spec in folder. No indication that the procedure they use (even though not written) minimizes stress concentration on the pipe. There is one welder in Whatcom that is certified to weld this coupon onto transmission & HP pipe. Rick stated that Division is always here when this procedure is done. However, there still is no procedure that identifies that NDT should be completed prior to installation of this coupon. Asked which API version Bill Danko is using. – same as me. No inspection of coupon attachment prior to weld of pipe other than visual. Joel (Division Welding) is not using adopted reference API 1104 dated October 2005 w/Errata's. He is using November 2005 version. Received one dollar (coupon) and seal. No one has a copy of the materials specifications sheet. They called purchasing to get. Received a copy of Brian McConnell OQ sheet for welding on coupons to transmission. Mike E. stated that no NDT was conducted prior to fillet welding coupons on transmission line. Also have the other 3 welders OQ sheets. No NDT after coupon welded on transmission lines. Unknown which procedure the welder used since no information about pipe was identified and no engineering review/documentation re: pipe wall/type, temperatures, etc. Joel (Division Welding) identified that they always preheat before installing coupons on transmission piping. <u>04.11.11 REQUESTED FORM 525 (Required prior to welding HP or future HP lines. Copies are to be kept in District per CP's) per CP 760</u> Figure 1 CNG 525 HP Construction – Filler Metal Record CP 607.102 describes H-760 2" bare coupon. Procedure for attaching coupon but is under PE main/PE svc. to steel and describes must be full encirclement weld but then says it should be brazed. CNG definition for BRAZING states that brazing is soldering not welding. <i>Form 525 is not in District and Brian McConnell (coupon welder) stated that no one identified the grade of pipe prior to his welding. He identified that he was not informed but assumed pipe grade due to date of install = he assumed x42 but then identified it could be Grade B pipe. Point is that no one reviewed this or completed prior to work being done. Per Tina this Form is used for training only. Division Welding was advised to use only as guide for training per Bill Danko. This form has not been used. Also procedures issue since not following.</i> <p align="center">192.225 PV & AOC</p>		x		

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CONSTRUCTION RECORDS			S	U	N/A	N/C															
50.	192.227	Welder Qualification Any new welder qualification procedure completed? See #49. 192.503 Maximum hoop stress allowed as percentage of SMYS <table border="1"> <thead> <tr> <th>Class location</th> <th>Natural Gas</th> <th>Air or inert gas</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>80</td> <td>80</td> </tr> <tr> <td>2</td> <td>30</td> <td>75</td> </tr> <tr> <td>3</td> <td>30</td> <td>50</td> </tr> <tr> <td>4</td> <td>30</td> <td>40</td> </tr> </tbody> </table> (d) Each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure. Test reports in folder. Any non-welded joints in stl. HP distr. or in transmission system? No mech ftgs. per Rick No procedure for installation of Plidco Fittings Division welding identified they use an existing file procedure for attachment of test lead wire coupon.	Class location	Natural Gas	Air or inert gas	1	80	80	2	30	75	3	30	50	4	30	40	x			
Class location	Natural Gas	Air or inert gas																			
1	80	80																			
2	30	75																			
3	30	50																			
4	30	40																			
51.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months) No appendix C –API 1104	x																		
52.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	x																		
53.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	x																		
54.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months)	x																		
55.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 Always install vents on casings and attach test leads per CP 610. No install w/o casing per CNG CP's?	x																		
56.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains One Casing end on bridge at N. State at Whatcom Creek is not sealed and open to atmosphere. 03.11.11 -0.591 on casing (passed) and on 04.13.11 casing read was -0.965 failing because CNG CP's state that if read on casing is more negative than -0.73 then carrier read to be taken and then tinker-razor follows. Potential short to be documented at beginning within 90 days. Also listed in atmospheric corrosion requirements since open to atmosphere – listed under number #186. CNG corrosion identified above reads were not taken with equip. gr. on N. side of bridge – corrosion dept. completed new reads – acceptable. Copies of new reads in folder. A/C issue due to above grade casing termination unsealed and therefore must be inspected for A/C – Id'd under #186 below.	x																		
57.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	x																		
58.	192.241(a) PV	Visual Weld Inspector Training/Experience Requested that they change CP 760 to read per code and prior inspection PV's		x																	
59.	192.243(b)(2)	Nondestructive Technician Qualification. All contract employees.	x																		
60.	192.243(c) PV and AOC	NDT procedures NDT procedures for tie-ins? Yes and full wrap around. No documentation regarding engineering review of Hoop stress & % SMYS prior to weld work on transmission per CP 760.10 Procedures for coupon NDT. REQUESTED ENGINEERING DESIGN INFO REGARDING ENGINEERING REVIEW OF HOOP STRESS/SMYS PRIOR TO WORK ON TRANSMISSION PER cp 760.10 Also requested NDT for Line #9 8" Lake Terrell Rd. Transmission line and Line #3 8" Central Whatcom HP line – 1 coupon(All Ferndale lines.) Provide copies of engineering review RE: NDT for 4 locations: 1. Franklin & State, 2. 2 on transmission Line #9, and 3. 1 on HP Line #3 No NDT procedures for test lead wire coupon welding to dist./trans. mains			x																

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CONSTRUCTION RECORDS			S	U	N/A	N/C	
61.	192.243(f) PV	Total Number of Girth Welds: State and Franklin intersection was NDT'd. 33 welds w/6 NDT out of 477 ft. Number of girth welds = 4 Miter joints total 21-22 degree and a 16 degree bend. Joe Johnstone computed/identified that the SMYS on this miter location was 16% SMYS (he figured on computer during inspection) based upon x52 pipe. The construction documents identify that the weak link was Grade B with a SMYS of 24.57% on existing tie-in piping. API 1104 procedures define testing percentage. Adopted reference is API 1104 October 2005 & Errata's but API 1104 version in Division Welding is November 2005. New pipe installed=X-52. REQUEST ENGINEERING DESIGN INFO REGARDING MITERS ON THIS SECTION OF PIPE AT State and Franklin. Looks like no NDT on miters – verify. That meets 192.233 miter requirements. Note – no violation of 192 but is a <u>procedures violation</u> – CP's identify miters are not allowed per Kevin – engineering manager.					
62.	192.243(f)	Number of Welds Inspected by NDT – 6 out of 477 ft.	x				
63.	192.243(f)	Number of Welds Rejected None	x				
64.	192.243(f)	Disposition of each Weld Rejected None	x				
65.	192.303 PV	Construction Specifications		x			
66.	192.325 AOC	Underground Clearance CP 605.022 "Should" is to be changed to read "Shall" per 192.325. CNG agrees with language change and will address promptly.		x			
67.	192.327	Amount, location, cover of each size of pipe installed Okay per CP 605.493	x				
68.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length None	x				
69.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items:	x				
70.	480-93-160(2)(a)	Description and purpose of the proposed pipeline;	x				
71.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route.	x				
72.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed	x				
73.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed;	x				
74.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route.	x				
75.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment;	x				
76.	480-93-160(2)(g)	Welding specifications; and	x				
77.	480-93-160(2)(h)	Bending procedures to be followed if needed. Franklin & State: See above #61. I have questions on miters used: 192.233: (a) A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of 30 percent or more of SMYS may not deflect the pipe more than 3°. (b) A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of less than 30 percent, but more than 10 percent of SMYS may not deflect the pipe more than 12 1/2° and must be a distance equal to one pipe diameter or more away from any other miter joint, as measured from the crotch of each joint. (c) A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of 10 percent or less of SMYS may not deflect the pipe more than 90°. Copies of Franklin and State construction job in folder. Requested engineering stress info.		x			
78.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ 20% SMYS?	x				

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CONSTRUCTION RECORDS			S	U	N/A	N/C
79.	480-93-170(7) JOE	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) Reviewed records for July 2010 construction. Reviewed records for State and Franklin copies in folder. Loss of 2psi – review with Subsits. No pipe temp. taken but dew pts were taken. Received test records but they are lacking required information to determine acceptable test. REQUEST RECORDS FOR PRESSURE TESTS AT FERNDALE 20" – Test records provided show loss of 20 psi and do not include engineering info required to determine successful test. Request engineering review of pressure loss during test for determination of acceptable loss. Reviewed Whatcom County July 2010 installation pressure test records - okay all info included. 1. HP Line 18 – 20" Ferndale 08.23.93-08.24.93 Was this project reviewed by engineering for this 10psi loss in pressure – Determined acceptable by CNG engineering. 2. State and Franklin Bellingham 10" 11.1910-11.20.10 loss of 2psi.	x			
80.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? None	x			
81.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Reviewed 2009 and 2010 for Pyrometer, dial gauges, half-cells okay Asked for chart box calibration records. R-116 staff found a dial gauge that is attached at outlet piping – this gauge is not calibrated but is not used – Rick is removing this gauge. Rick identified that their procedures do not mention the use of this dial gauge.	x			
82.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig None	x			
83.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig 2009: Reviewed Cordata Pkwy 4" lowering of 4" wsc main. Job completed and leak surveyed same day – okay. (See #65) WAC 480-93-175(3) study for lowering see elsewhere in form – okay under leak surveys. (3) Before moving or lowering a gas pipeline other than the line pipe described in subsection (2) of this section, each gas pipeline company must prepare a study to determine whether moving or lowering will cause an unsafe condition. The gas pipeline company's <u>engineering department must review, approve, and retain</u> the study for the life of the pipeline. The <u>study must analyze the following factors</u> : (a) The required deflection of the pipe; Not given (b) The diameter, wall thickness, and grade of pipe; (c) The characteristics of the pipeline; (d) The terrain and class location; (e) The present condition of the pipeline; (f) The anticipated stresses of the pipeline including the safe allowable stress limits; and (g) The toughness of the steel.	x			

Comments:

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

PV - 192.703(b): CNG did not take action to correct or evaluate unsafe conditions. On 03.04.08 CNG employees reported abnormal operating conditions (AOC's) existed identifying "no supports, sagging, exposed" for two services spanning a creek at three separate locations. On 03.06.08 CNG employees again reported "lots of sagging on 2". Each service is ¾" steel installed in 2" coated steel casing. a) 1601 Main St., Lynden (two locations), b) 1647 Main St., Lynden (one location).
PV – WAC 480-93-175(2) Except for the pipe referenced in subsection (1) of this section, a gas pipeline company may move or lower metallic line pipe with an MAOP of sixty psig or less, which has a nominal diameter of two inches or less, if the gas pipeline company can certify that no undue stresses will be placed on the pipeline and that it can be moved or lowered in a safe manner. The gas pipeline company must consider factors such as the type of materials, proximity to fittings, joints, and welds, and any other factors that could place undue stress on the gas pipeline or create an unsafe condition. Requested from Tina/Patti/Mike E. re: weld in #49/imp/origination/test docs. Requested info on lowering of metallic main – No vertical information in design plans for lowering of pipe for Cordata Pkwy. See # 83. Also, in reviewing information on this lowering I found that the Clerk had adjusted the lowering records by adding a vertical dimension to one of the drawings indicating at the toe the depth of main was lowered to 71" when the advised lowering of pipe was identified as 5'-9". Rick is checking with Clerk. Clerk added info onto as-builts to indicate the actual lowering of the pipe rather than from top of pavement of 38" rather than 71". Lowering that occurred was identified by engineering to have been 125' in each direction – records do not show that the 125' in each direction was met. Copies of as-builts in folder.

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
84.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline See #79	x			
85.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years See #79 for franklin and state test.	x			
86.	192.605(a) PV	<p>Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09</p> <p>192.613 (a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.</p> <p>(b) If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the operator shall initiate a program to recondition or phase out the segment involved, or, if the segment cannot be reconditioned or phased out, reduce the maximum allowable operating pressure in accordance with §192.619 (a) and (b). Rick identified that the transmission vault problems with regard to bringing valves above grade due to sight visit and added to his 5-year plan. Rick has determined that this is an unsatisfactory condition and has identified it but they have not initiated a program to recondition or phase out. Rick is providing documentation showing. See yellow email copy from Rick to Dave Grunhurd dated 04.09.11</p> <p>Did CNG address vault full. No- employees identified to GM that vaults were inaccessible or full of water. This is a training issue that needs to be addressed. This has been discussed by with Regional Director David Grunhurd who is forwarding to Tim Clark for addition of above vault issue to 5 year plan.</p> <p>Emergency plan addresses shut areas that would be needed in cases such as unable to access valves such as with these vault issues to use valves such as R-12 and R-11. This is a training issue but now also falls into the 740.09 Valve and Vault maintenance issues. CHECK VAULT MAINTENANCE RECORDS. Provide mfg submerged valves allowed. All Cameron Valves.</p> <p>Reviewed procedure training/update/review takes place in safety meetings but also procedure changes and subsequent training occurs in special meeting as required. Rick and Kathy track these. Tina identified work in progress. Staff sees improvement but more needed.</p> <p>Continuing surveillance issue at Mt. Baker Hwy with approx. 40' of fill over top of pipeline – should have been monitored under 192.613. This pipeline was installed in 1993. This is line 17 – 10" Squalicum line.</p>		x		

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
87.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel No update of grid maps after June/July 2009 and transitioned to spread sheet to update GIS. Local maps are updated by Clerk Glen Swenson and Joe Wilkinson and Darlene Huntley are the Clerks. At present construction people do not have access to GIS but servicemen do. Construction people work off grid maps but next leak after this date they will be working off GIS format maps. Tina estimates transition to take an additional 2 years to complete. Tina identified that accuracy of conversion from grid to GIS re: coordinate locations of the actual property locations is approx. 70% or better of those that have been transferred. No data available regarding number of main and services actually installed or the assoc. % of accuracy.	x			
88.	480-93-018(5) PV	Records, including maps and drawings updated within 6 months of completion of construction activity? All of below are September 2009. <u>Requested the following Casing grid/GIS/Service mapping records</u> 1. 601 W. Chestnut (Grid map #17-N) – not on Annual Casing Survey Report (reported in #177) casing shows on grid and GIS. 2. 213 e. Champion (Grid map #18-N) – not on Annual Casing Survey Report (reported in #177) and is in GIS (<u>map indicates service line comes off casing</u>) 3. Meador Ave @ Humbolt St. (Grid map # 18-N) not on Annual Casing Survey Report. (reported in #177) <u>Requested the following New Services grid/GIS/Service mapping records:</u> 1. 2214 “J” St. Drawn-in as new service on grid and shows in GIS 2. 1108 Irving St. Drawn-in as new service on grid and shows in GIS <u>Requested the following Retirements noted on grid:</u> 1. 1000 “C” St. – did not appear on GIS but is entered on list now 2. 1001 #D “C” St. – did appear on GIS 3. 1001 #P “C” St. – did appear on GIS 4. 901 “C” St. – shown in GIS but not as a retired service <u>Requested the following main and service grid map and GIS records:</u> 1. Ellis and State streets intersection: identified on grid maps but not on GIS: 04.12.11 CNG identified on list for corrections. Okay. 2. Mt. Baker Hwy:- 1286 Mt. Baker Hwy. svc was shown off wrong main but was already identified as an error and was on the correction list.		x		
89.	192.605(b)(8) PV	Periodic review of personnel work – effectiveness of normal O&M procedures Primary focus of PL safety specialist in many areas is to do internal audits to determine effectiveness of personnel and AOC's & improve/change procedures incl. quality control. Construction and svc manager breaks – Rick Kelln is District Ops Mgr. and Kathy Bergner is District Manager. Appears to be a possible training issue with regard to surveillance and the effectiveness of the surveillance e.g. fill over pipeline on Mt. Baker Hwy and another is no documentation by crews regarding water in vaults. Procedures appear to be fine.		x		
90.	192.605(c)(4) PV for R/W	Periodic review of personnel work – effectiveness of abnormal operation procedures See above #89 Requested surveillance records for Mt. Baker Hwy fill issue. Reviewed surveillance records 2010 & 2009 for Mt. Baker Hwy fill area 10” Squalicum HP Distr. Line at approx. 340psi. R/W issues were not noted in surveillance records reviewed - 2009 or 2010..		x		
91.	192.609 PV	Class Location Study (If applicable) Do not have but are doing with GIS and Tina has defined as an engineering task on your maintenance reminder which is a compliance task list (identification of task completion dates, etc..)		x		
92.		Damage Prevention (Operator Internal Performance Measures)				
93.	192.614	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) 1 mis-locates in 2010, 2 in 2009. Rick has identified that he reviewed and their were mitigating factors that were beyond locators control. If locator negligence Rick would write up – none were written up.	x			
94.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? N/A	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

OPERATIONS and MAINTENANCE RECORDS		S	U	N/A	N/C
95.	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?	x			
96.	Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	x			
97.	Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	x			
98.	Are locates are being made within the timeframes required by state law and regulations? Examine record sample. Reviewed records for November 2010.	x			
99.	Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	x			
100.	Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? Reviewed 2010 and 2011 2. In the case of blasting, does the inspection include leakage surveys? None	x			
101.	Informational purposes only. Not Required. Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do Y x Registered N	x			

Comments:

Emergency Response Plans		S	U	N/A	N/C
103.	192.603(b) Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response Reviewed 3 rd party damage/leak investigation for 2010/2011 Requested engineering review/approval of 9164 Trapline Rd. Transmission line # 10 16" North Whatcom Design press. 600 operating (520psi. 04.06.11) Info on whether long-seam issue from engineering. Request NDT. Copy of repair info in folder. Identified as IM issue.	x			
104.	192.615(b)(1) Location Specific Emergency Plan reviewed emergency shut-down plan dated 03.11.11.and Incident Command system manual (ICS) dated 03.28.11. Requested information from CNG re: manufacturers approval for valves to be located under water operation.	x			
105.	192.615(b)(2) Emergency Procedure training, verify effectiveness of training	x			
106.	192.615(b)(3) Employee Emergency activity review, determine if procedures were followed. CNG Form 234 was created to follow-up with incidents and are reviewed by Kathy, Rick, and Tina and 3 Regional Managers Klapp, Merick and Grunherd. Regional mgrs are only ones that sign off – Tina considering all that see sign off.	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

107.	192.615(c) AOC	Liaison Program with Public Officials Reviewed meetings with various officials by incl. large amount of training information provided to local public officials such as police, fire, local emergency management group. Although do not see meeting/training interval for liaisoning with public officials they identified they would setting meetings with those officials that do not hold meeting of their own. Mock drill to be held this year.		x		
108.	192.616	Public Awareness Program				
109.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:		x		
110.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.				
111.		API RP 1162 Baseline* Recommended Message Deliveries				
112.		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)			
		Residence Along Local Distribution System	Annual Twice annually incl. R/W clearing notification Bill insert titled Pub Awareness & Safety = newsletter-copy in folder			
		LDC Customers	Twice annually – same as above			
		One-Call Centers	As required of One-Call Center One-call outreach magazine excav. Safety manuals –annual plus do one-call meeting with one-call svcs in approx 05 or 05 prior to most spring excav.			
		Emergency Officials	Annual PAPA folder incl. scenarios. CD among other things.			
		Public Officials	3 years –cycle w/new message every three years. Annually – Pipeline Awareness Brochure			
		Excavator and Contractors	Annual One-call outreach magazine excav. Safety manuals –annual plus do one-call meeting with one-call svcs in approx 05 or 05 prior to most spring excav.			
		Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)			
		Residence Along Local Distribution System	2 years PL Safety in your community broch.			
		One-Call Centers	As required of One-Call Center – same as above.			
		Emergency Officials	Annual same as above			
		Public Officials	3 years same as above			
		Excavator and Contractors	Annual same as above			
		113.				
114.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.		x		
115.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 . 616(h)		x		

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

116.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. N/A	x			
117.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage (PHMSA area of emphasis)	x			

Comments:

118.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08)	x			
119.	480-93-015(1)	Odorization of Gas – Concentrations adequate 1 removed completely = Sumas 0-1 and 1 not active = Minaker O-2 not in use but maintaining. 7 Active = O-3 Leibrandt Rd., Lynden Everson Gate (off Williams); O-4 Lawrence (at East Hoff Rd., Lawrence); O-5 Demming (Water Rd, Demming); O-6 Rothenbuhler Rd., Acme; O-7 “Y” Rd., Bellingham; O-8 Bellingham 1 at Britton Rd., Bellingham; O-9 Jones Rd. at Odorizer Border in Sumas. Reviewed Jan, Feb, and March of 2011-Copy of O-9 measured throughput is in folder for comparison to capacity total at R-116.	x			
120.	480-93-015(2)	Monthly Odorant Sniff Testing Reviewed locations of sniff tests taken. Reminded CNG to consider via analysis those locations which are at the extremities of their system and not necessarily the high flow customers. We reviewed Deming, Acme and Bellingham areas.	x			
121.	480-93-015(3) AOC	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements Noted several Service Request form 305 that svcmen identified that odorant check/test did not apply or they just did not fill out this portion of the form stating that odorant was detectable – no follow-up to statements/notation on the form was provided. Forms reviewed for September 2010. Copies in folder. Per Rick there is no reason that in testing set for lock-up that svcmen should not smell gas.		x		
122.	480-93-015(4) AOC	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) CNG did not complete their odorometer form when received back from calibration for 2009 annual calibration. Copy in folder. This is a Procedures violation. (Form 296)		x		
123.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) Yes. Reviewed ¼ patrols for spans and other AOC – very detailed. okay	x			
124.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days? Only one location noted in random review of 16” N. Whatcom inspection that was missing a marker that had been previously placed. Since the marker was at deflection/direction change location GM is verifying placement – no trend showing many locations where markers are not identified on maps reviewed in this leak survey section. Improved mapping for what was reviewed. 2009 maps not as improved/detailed as 2010 and 2011.	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

125.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on Reviewed September 2010 records. Noted several forms that svcmen identified that odorant check/test did not apply or they just did not fill out this portion of the form stating that odorant was perceptible.	x			
126.	480-93-155(1)	Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? None	x			
127.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? Requested September 2010 substructure records for review.	x			
128.	480-93-185(3)(a)	Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and;	x			
129.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? Records are retained but difficult to obtain docs for letters sent.	x			
130.	480-93-186(3) PV	Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? Records were unavailable for documenting follow-up leak survey for Yew St. & Douglas Ave., Bellingham and 704 40 th St. Bellingham. Copies in file. CNG has revised this form in an effort to prevent a reoccurrence of this in late summer 2010.		x		
131.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?	x			
132.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13)	x			
133.	480-93-188(1) PV	Gas leak surveys 2011 Leak Survey for 16" N. Whatcom Line #10 identifies that FT's were surveyed but the 2010 leak survey did not identify that these locations were surveyed. Records in folder. The following were identified as having been leak surveyed but there was no way to leak survey over the main since span ck. But svcmen identified that they leak surveyed – see copies of 2008/09/10 for this Lynden leak survey. 1. Exposed coated casing/service/main 1601 Main St., Lynden – casing is to be bare steel. a. Svc. is unprotected from flooding damage, etc. and does not have markers at irrigation/creek xing 2. Exposed coated casing/service/main 1647 Main St., Lynden – casing is to be bare steel a. Svc. is unprotected from flooding damage, etc. and does not have markers at irrigation/creek xing 3. Exposed coated/ casing/service/main 1700 Main St., Lynden - Markers? This is an OQ issue re: leak survey of aerial structures.		x		
134.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)	x			
135.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	x			

Business Districts (implement by 6/02/07)	1/yr (15 months)
High Occupancy Structures	1/yr (15 months)
Pipelines Operating ≥ 250 psig	1/yr (15 months)
Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)

136.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs Reviewed main st. projectd Ferndale 03.25.11	x			
137.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred Reviewed substructure project in Blaine – contractor hit – damage repaired and surveyed - okay	x			
138.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected Leak Survey done 5-8 times within a one year span before abandonment and replacement.	x			
139.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions East Bellingham Shutdown #12.s	x			
140.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

141.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f)	x															
142.	480-93-188(6)	Leak program - Self Audits Last one completed in 2009 – not to exceed 3 yrs.	x															
143.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 No class 3 or 4 locations. Patrol all transmission 2 times per year.	x															
<table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </tbody> </table>							Class Location	At Highway and Railroad Crossings	At All Other Places	1 and 2	2/yr (7½ months)	1/yr (15 months)	3	4/yr (4½ months)	2/yr (7½ months)	4	4/yr (4½ months)	4/yr (4½ months)
Class Location	At Highway and Railroad Crossings	At All Other Places																
1 and 2	2/yr (7½ months)	1/yr (15 months)																
3	4/yr (4½ months)	2/yr (7½ months)																
4	4/yr (4½ months)	4/yr (4½ months)																
144.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706	x															
<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr	7½ months																
4	4/yr	4½ months																
145.	192.603(b)	Patrolling Business District (4 per yr/4½ months) Reviewed Lynden	x															
146.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2)	x															
147.	192.603(b) PV for WAC 186	Leakage Survey - Outside Business District (5 years) 192.723(b)(1) Requested copies of leak record work order for #169958 & #169774 #169958 shows a 4' split seam on a pipe repaired – 42% & 8% gas/air identified – no 30-day follow-up #169774 shows a 2" butt weld leaking – 5% gas/air identified – no 30-day follow-up.		x														
148.	192.603(b)	Tests for Reinstating Service Lines 192.725	x															
149.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 None	x															
150.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 Reviewed R-84; R-19, R-20, R-21 - okay	x															
151.	192.709 PV	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 Requested but not provided. Was provided with Regulator Set Point list dated 04.07.11 which includes MAOP inlet/outlet & Maximum Allowable relief set point and Maximum Allowable regulator Lockup set point. CP 745.082 – R-19 @ Telegraph Rd. & James St. Rd., Bellingham. CNG will review procedures to determine whether they need to address not having checked chart box and/or downstream customer for overpressurization prior to leaving Reg sta on relief blowing incident January 24, 2011. CNG agrees that this is a training/OQ issue. Requested Williams and Sempra capacity info and review records from engineering			x													
152.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745	x															
153.	192.709 PV	Valve Maintenance – Distribution (1 per yr/15 months) .747 R-20 shut-off valve is not numbered and has not been maintained. Copy in file.		x														
154.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) CNG has 17 SV's	x															
155.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 None	s															
156.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751	x															
157.	192.603(b) AOC	Welding – Procedure 192.225(b) See above Joel Johnstone utilization of no-adopted reference of API 1104 November 2005 rather than October 2005 plus two errata		x														
158.	192.603(b)	Welding – Welder Qualification 192.227/229	x															
159.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2) State and Franklin utilized NDT – in folder.	x															
160.	192.709	NDT Records (pipeline life) .243(f)	x															
161.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	x															

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

162.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's) Annually.	x			
------	------------	---	---	--	--	--

Comments:
Tina is providing 192.631 control room mgmt. Not due until August 1, 2011, with implementation by 2013.

CORROSION CONTROL RECORDS			S	U	N/A	N/C
163.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 <i>(for buried pipelines installed after 7/31/71)</i>	x			
164.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction <i>(after 7/31/71)</i>	x			
165.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years)None	x			
166.	192.491	Maps or Records .491(a) Ground beds review on Dustin computer for one Bellingham location and two Lynden locations. Galvanic systems in Acme, Lawrence and Deming	x			
167.	192.491	Examination of Buried Pipe when exposed .459	x			
168.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed	x			
169.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) Annual submitted is same as bi-monthly. They do complete specific annual however, this form was missed during CY 2010 but data appears in other location. During internal CNG annual review with CP rep and District Mgr. this issue was discussed and has been remedied.	x			
170.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b)	x			
171.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) Kickerville Rd. and Henry Rd. Intersection.	x			
172.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c)None at present.	x			
173.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)	x			
174.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation. Dustin Knowles only in this area. Reviewed ½ cells for 2009, 2010, Voltmeters for 2010 & 2009.	x			
175.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) None.	x			
176.	192.491	Electrical Isolation (Including Casings) .467	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CORROSION CONTROL RECORDS			S	U	N/A	N/C	
177.	480-93-110(5) PV	<p>Casings inspected/tested annually not to exceed fifteen months Requested the following Casing grid/GIS/Service mapping records in Bellingham:</p> <ol style="list-style-type: none"> 601 W. Chestnut (Grid map #17-N) – not on Annual Casing Survey Report (ID'd in #177) casing shows on grid and GIS. 213 e. Champion (Grid map #18-N) – not on Annual Casing Survey Report (ID'd in #177) and is in GIS (map indicates service line comes off casing) Meador Ave @ Humbolt St. (Grid map # 18-N) not on Annual Casing Survey Report. (ID'd in #177) Kentucky and Grant casing. – okay N. Whatcom Ck. (Ellis) and State – okay Meador Ave @ Humbolt St. (grid map 18-N) not on Annual Casing Survey Report. Appears on Grid map and GIS. Bellingham lateral & Mt. Baker Hwy. casing – okay. <p>The following locations are also identified in #188 regarding supports & anchors and #210 for markers potential issues:</p> <ol style="list-style-type: none"> Exposed coated casing/service/main 1601 Main St., Lynden – casing is to be bare steel. <ol style="list-style-type: none"> Svc. is unprotected from flooding damage, etc. and does not have markers at irrigation/creek xing – never read Exposed coated casing/service/main 1647 Main St., Lynden – casing is to be bare steel Svc. is unprotected from flooding damage, etc. and does not have markers at irrigation/creek xing – never read 					
178.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods Tinker razor at Robinson St/Mead Ave, Everson;Dahlquist Ln/Hwy 544, Everson – no test leads among several others. CNG id'd that all installed prior to above date and use Tinker razor. See records under #177 in folder.	x				
179.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days No shorts noted in 03.23.11 report reviewed.	x				
180.	480-93-110(5)(c)	Casing shorts cleared when practical	x				
181.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months	x				
182.	192.491	Interference Currents .473	x				
183.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) None.	x				
184.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b)	x				
185.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 None	x				
186.	192.491 PV	<p>Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 WAC 93-110: One Casing end on bridge at N. State at Whatcom Creek is not sealed and open to atmosphere. Also listed in atmospheric corrosion requirements since open to atmosphere – listed under number #56 Received engineering calcs for 16" xing when xing is 14". Received new calcs 04.19.11 for 14" casing stating allowable span is 55.21' for the 14" with the 10" is resting inside on ID of pipe as a uniform support. Contacted CNG 05.24.11 re: yield strength used in their calculations – they used 35Kpsi. They identified their assumption that all pipe ordered by CNG was Grade B but no docs on this particular pipe. I referred them to 192.107 re: the age of pipe and they replied later in the day that they changed their yield strength of pipe to 24Kpsi. Span still meets allowable fixed end support span calc'd out at 53.48ft. Engineering also identified they will be using 24Kpsi in all future calc's for similar age/situation pipe.</p>					
187.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 Excessive pitting was not measured prior to repair at Portal Way and Lakeway Dr.	x				

Comments:

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Comments:

PIPELINE INSPECTION (Field)		S	U	N/A	N/C
188.	<p>192.161 PV</p> <p>Supports and anchors (a) Each pipeline and its associated equipment must have enough anchors or supports to: (1) Prevent undue strain on connected equipment; (2) Resist longitudinal forces caused by a bend or offset in the pipe; and, (3) Prevent or damp out excessive vibration. (b) Each exposed pipeline must have enough supports or anchors to protect the exposed pipe joints from the maximum end force caused by internal pressure and any additional forces caused by temperature expansion or contraction or by the weight of the pipe and its contents. (c) Each support or anchor on an exposed pipeline must be made of durable, noncombustible material and must be designed and installed as follows: (1) Free expansion and contraction of the pipeline between supports or anchors may not be restricted. (2) Provision must be made for the service conditions involved. (3) Movement of the pipeline may not cause disengagement of the support equipment. (d) Each support on an exposed pipeline operated at a stress level of 50 percent or more of SMYS must comply with the following: (1) A structural support may not be welded directly to the pipe. (2) The support must be provided by a member that completely encircles the pipe. (3) If an encircling member is welded to a pipe, the weld must be continuous and cover the entire circumference. (e) Each underground pipeline that is connected to a relatively unyielding line or other fixed object must have enough flexibility to provide for possible movement, or it must have an anchor that will limit the movement of the pipeline. (f) Except for offshore pipelines, each underground pipeline that is being connected to new branches must have a firm foundation for both the header and the branch to prevent detrimental lateral and vertical movement. The following locations are also identified in #176 regarding casings and #210 for markers potential issues: REVIEW BELOW FOR (a)(b) and (d) above: 4. Exposed coated casing/service/main 1601 Main St., Lynden – casing is to be bare steel. a. Svc. is unprotected from flooding damage, etc. and does not have markers at irrigation/creek xing 5. Exposed coated casing/service/main 1647 Main St., Lynden – casing is to be bare steel a. Svc. is unprotected from flooding damage, etc. and does not have markers at irrigation/creek xing 6. Exposed coated / casing/service/main 1700 Main St., Lynden - Markers? 7. Exposed coated /casing/service/main 1770 Main St., Lynden – Markers? N. Whatcom Ck. And State St. – requested that CNG provide records indicating that they have reviewed and approved supports for 14” casing at this location. Reviewed calcs for 10” carrier, 14” casing. Questioned yield strength used for these 35Kpsi – engineering identified that they had assumed all CNG pipe prior to '70 was Grade B so calc'd 35Kpsi. He id'd that he recalcd using 24Kpsi per 192.107 and will be utilizing 24Kpsi in all future applicable calcs. Span for this location still okay – works out to 53.48' allowable for fixed ends support.</p>		x		
189.	480-93-080(1)(d) Welding procedures located on site where welding is performed?	x			
190.	480-93-080(1)(b) Use of testing equipment to record and document essential variables	x			
191.	480-93-080(2)(a) Plastic procedures located on site where welding is performed?	x			
192.	480-93-080(3) Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed.	x			
193.	480-93-013 Personnel performing “New Construction” covered tasks OQ qualified?	x			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
194.	480-93-015(1)	Odorization	x			
195.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	x			
196.	192.179	Valve Protection from Tampering or Damage	x			
197.	192.455	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71)	x			
198.	192.463	Levels of cathodic protection	x			
199.	192.465	Rectifiers	x			
200.	192.467	CP - Electrical Isolation	x			
201.	192.476	Systems designed to reduce internal corrosion	x			
202.	192.479	Pipeline Components exposed to the atmosphere – Incl. above.	x			
203.	192.481	Atmospheric Corrosion: monitoring – Incl. above.	x			
204.	192.491	Test Stations – Sufficient Number .469	x			
205.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	x			
206.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed? Incl. above	x			
207.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	x			
208.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	x			
209.	192.605	Knowledge of Operating Personnel Incl. above	x			
210.	480-93-124	Pipeline markers The following locations are also identified in #176 for casings and #188 regarding supports & anchors potential issues: 1. Exposed coated casing/service/main 1601 Main St., Lynden – casing is to be bare steel. a. Svc. is unprotected from flooding damage, etc. and does not have markers at irrigation/creek xing 2. Exposed coated casing/service/main 1647 Main St., Lynden – casing is to be bare steel a. Svc. is unprotected from flooding damage, etc. and does not have markers at irrigation/creek xing 3. Exposed coated /casing/service/main 1700 Main St., Lynden - Markers? 4. Exposed coated /casing/service/main 1770 Main St., Lynden – Markers?		x		
211.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days ?	x			
212.	192.719	Pre-pressure Tested Pipe (Markings and Inventory)	x			
213.	192.195	Overpressure protection designed and installed where required?	x			
214.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	x			
215.	192.741	Telemetering, Recording Gauges See above	x			
216.	192.751	Warning Signs See above	x			
217.	192.355	Customer meters and regulators. Protection from damage	x			
218.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated. See above	x			
219.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices?	x			
220.	480-93-178(2) PV	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)		x		
221.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	x			
222.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards				
223.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No x				
224.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage? N/A	x			
225.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? N/A	x			
226.	192.745	Valve Maintenance (Transmission)	x			
227.	192.747	Valve Maintenance (Distribution) See above.		x		

Facility Sites Visited:

Facility Type	Facility ID Number	Location

Comments:

Reviewed pipe in yard under 192.59 for UV protection. Pipe age/details as follows:
6" Stick IPS Driscoplex 6800 Gas PE 3408 CDE ASTM D2513 RN639 V dated 07.08.05; Yellowstripe dated December 19, 2006/July 8, 2005/ and September 14, 2000. Rick will provide details.
4" Stick ASTM D2513 Medium Density PE dated December 13, 2010
2" Coil PE 2406/2408 dated January 26, 2011.

THIS DISTRICT DOES NOT HAVE A COMPRESSOR STATION.

Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-07-02	February 29, 2008	Correction - Pipeline Safety: Updated Notification of the Susceptibility to

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

ADB-08-01	May 13, 2008	Premature Brittle-Like Cracking of Older Plastic Pipe Pipeline Safety - Notice to Operators of Gas Transmission Pipelines on the Regulatory Status of Direct Sales Pipelines
ADB-08-02	March 4, 2008	Pipeline Safety - Issues Related to Mechanical Couplings Used in Natural Gas Distribution Systems
ADB-08-03	March 10, 2008	Pipeline Safety - Dangers of Abnormal Snow and Ice Build-Up on Gas Distribution Systems
ADB-08-04	June 5, 2008	Pipeline Safety - Installation of Excess Flow Valves into Gas Service Lines
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications
ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe

For more PHMSA Advisory Bulletins, go to <http://ops.dot.gov/regs/advise.htm>

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		COMPRESSOR STATION PROCEDURES		S	U	N/A	N/C
228.	.605(b) NO COMPRESSOR STATION						
229.		.605(b)(6)	Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			X	
230.		.605(b)(7)	Starting, operating, and shutdown procedures for gas compressor units			X	
231.		.731	Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			X	
232.		.735	(a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			X	
233.			(b) Tank must be protected according to NFPA #30			X	
234.		.736	Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			X	
235.			• 50% of the upright side areas are permanently open, or			X	
236.			• It is an unattended field compressor station of 1000 hp or less			X	

Comments:
NO COMPRESSOR STATION

			COMPRESSOR STATION O&M RECORDS		S	U	N/A	N/C
237.	.709 NO COMPRESSOR STATION	.731(a)	Compressor Station Relief Devices (1 per yr/15 months)			X		
238.		.731(c)	Compressor Station Emergency Shutdown (1 per yr/15 months)			X		
239.		.736(c)	Compressor Stations – Detection and Alarms (Performance Test)			X		

Comments:
NO COMPRESSOR STATION

			COMPRESSOR STATIONS INSPECTION (Field)		S	U	N/A	N/C
			(Note: Facilities may be "Grandfathered")					
240.	.163	(c)	Main operating floor must have (at least) two (2) separate and unobstructed exits				X	
241.			Door latch must open from inside without a key				X	
242.			Doors must swing outward				X	
243.		(d)	Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit				X	
244.			Each gate located within 200 ft of any compressor plant building must open outward				X	
245.			When occupied, the door must be opened from the inside without a key				X	

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
246.	(e)	Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			X	
247.	.165 (a)	If applicable, are there liquid separator(s) on the intake to the compressors?			X	
248.	(b)	Do the liquid separators have a manual means of removing liquids?			X	
249.		If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			X	
250.	.167 (a)	ESD system must:				
251.		- Discharge blowdown gas to a safe location			X	
252.		- Block and blow down the gas in the station			X	
253.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			X	
254.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			X	
255.		ESD system must be operable from at least two locations, each of which is:				
256.		- Outside the gas area of the station			X	
257.		- Not more than 500 feet from the limits of the station			X	
258.		- ESD switches near emergency exits?			X	
259.	(b)	For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			X	
260.	(c)	Are ESDs on platforms designed to actuate automatically by...				
261.		- For unattended compressor stations, when:				
262.		▪ The gas pressure equals MAOP plus 15%			X	
263.		▪ An uncontrolled fire occurs on the platform?			X	
264.		- For compressor station in a building, when				
265.		▪ An uncontrolled fire occurs in the building?			X	
266.		▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?			X	
267.	.171 (a)	Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			X	
268.	(b)	Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			X	
269.	(c)	Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			X	
270.	(d)	Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			X	
271.	(e)	Are the mufflers equipped with vents to vent any trapped gas?			X	
272.	.173	Is each compressor station building adequately ventilated?			X	
273.	.457	Is all buried piping cathodically protected?			X	
274.	.481	Atmospheric corrosion of aboveground facilities			X	
275.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			X	
276.		Are facility maps current/up-to-date?			X	
277.	.615	Emergency Plan for the station on site?			X	
278.	.619	Review pressure recording charts and/or SCADA			X	

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be "Grandfathered")						
279.	.707	Markers			X	
280.	.731	Overpressure protection – relief's or shutdowns			X	
281.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			X	
282.		Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30?			X	
283.	.736	Gas detection – location			X	

Comments:
 NO COMPRESSOR STATION