

CERTIFIED MAIL

February 1, 2005

Will Odell
Chief Operating Officer
Cascade Natural Gas Corporation
222 Fairview Avenue North
Seattle, Washington 98109

Dear Mr. Odell:

Subject: 2004 Natural Gas Safety Inspection, CNG –Richland/Walla Walla Districts

Commission Pipeline Safety staff (Staff) conducted a pipeline safety inspection from October 20-22, 2004, of the Cascade Natural Gas (CNG) facilities in the Richland district. The Walla Walla district was inspected from November 22-23, 2004. No apparent violations were noted as a result of the inspection. However, the report notes two areas of concern/recommendation for the Richland district inspection, and one area of concern/recommendation for the Walla Walla district. If not addressed, these could result in future violations with state or federal pipeline safety codes.

AREAS OF CONCERN/RECOMMENDATION

RICHLAND DISTRICT

1. **49 CFR 192.707 Line Markers for Mains and Transmission Lines**

- (c) *Pipelines aboveground. Line markers must be placed and maintained along each section of a main and transmission that is located aboveground in an area accessible to the public.*

Finding(s):

In the Richland District, there were several aboveground facilities that required aboveground markers. This included the Boise-Wallula Regulator Station and the span near 10th and Washington. It is our understanding that markers have already been posted.

2. **49 CFR 192.463 External Corrosion Control: Cathodic Protection**

- (a) *Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part.*

Finding(s):

On October 21, 2004, pipe-to-soil readings read at Valve -53 were -0.83 V, -0.80 V at 4912 Coppertown and -0.80 V at Odorizer Station 9. It was believed that this was due to a short in the system. To avoid a potential violation, staff suggests completing remedial action within 90 days of discovery, as required to correct the deficiencies. Provide to the Commission written documentation indicating corrective measures taken and the resulting pipe-to-soil readings.

WALLA WALLA DISTRICT

3. **49 CFR 192.491 Corrosion Control Records**

- (c) *Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist.*

Finding(s):

A record for one of the rectifier inspections due in July 2004 was missing. We reviewed the operator's timesheet that would have covered this event. The timesheet revealed that the operator worked on cathodic protection activities

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during that time period, but this does not necessarily prove that the rectifier was inspected.

Please review the attached report and respond in writing by March 3, 2005. The response should include a letter of intent and the date you plan to provide full compliance with each of the items noted in the report. Also be advised that some of these issues are similar to concerns raised in other CNG districts. Repeat violations are often viewed as major compliance concerns when evaluating an operators pipeline safety program.

It is the responsibility of CNG to review the operation and maintenance of the entire pipeline system on an ongoing basis to ensure that the company is in full compliance with all applicable state and federal pipeline safety requirements.

If you have any questions or if Staff may be of any assistance, please contact Joe Subsits at (360) 664-1322. Please refer to docket numbers PG-041788 in any future correspondence regarding this report.

Sincerely,

Alan E. Rathbun
Pipeline Safety Director

The Washington Utilities and Transportation Commission (Commission) has the authority to enforce the minimum safety regulations per Chapter 480-93 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance and operation of pipelines transporting natural gas in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49, Part 191 and 192.