

November 6, 2003

Paul Bruning, Plant Manager
Sumas Cogeneration Co., L.P.
601 West Front Street
PO Box 220
Sumas, Washington 98295-0220

Dear Mr. Bruning:

Subject: 2003 Intrastate Natural Gas Transmission Standard Inspection

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.

On October 8th through 10th, 2003, Commission Pipeline Safety Staff (Staff) conducted an on-site safety inspection of the Sumas Cogeneration Plant facilities in Sumas, Washington. The purpose of the inspection was to review manuals, records, and to conduct field tests on the 8-inch nominal diameter pipeline facilities to verify compliance with the CFR Title 49, Part 192 and WAC 480-93 to ensure public safety and safe pipeline operations. Staff did not find any apparent violations of the regulations during the inspection, however, one area of concern is noted.

The area of concern includes operator's operation and maintenance manual, section 7 for Pipeline Repair Procedures. These procedures did not include a complete set of documentation for butt and fillet welds. Each weld procedure needs documentation for qualifying the procedures for compliance with CFR Part 192.225 and API Standard 1104. Staff would appreciate a copy of these procedures and qualifying results by December 16, 2003.

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Staff would like to thank you and Mr. Stu Keck, Operations Supervisor and Ms. Patt O'Faherty, CH2M Hill Engineer for their assistance in completing this inspection.

If you have any questions or need any assistance, please contact Al Jones, Pipeline Safety Engineer, at (360) 664-1231.

Thank you.

Sincerely,

Alan E. Rathbun

Pipeline Safety Director