

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	Cascade Natural Gas Corp Distribution Systems	Operator(s)	CASCADE NATURAL GAS CORP (2128)	Plan Submitted	04/12/2019
		Lead	David Cullom	Plan Approval	04/16/2019 by Joe Subits
		Team Members	Darren Tinnerstet	All Activity Start	04/02/2019
Status	PLANNED	Observer(s)	Scott Rukke, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood, Scott Anderson, Rell Koizumi	All Activity End	05/17/2019
Start Year	2019	Supervisor	Joe Subits	Inspection Submitted	--
System Type	GD	Director	Sean Mayo	Inspection Approval	--
Protocol Set ID	WA.GD.2017.01				

## Inspection Summary

No probable violations or areas of concern were noted during this inspection. (Bellingham Unit)

Operations, maintenance and emergency response records were reviewed in the Bellingham office. During the field portion of the inspection, we visited regulator stations, rectifiers, valves, odorant test sites, casings and CP test sites.

Theron Doughty discussed CNGCs plans to perform interrupted annual CP surveys using the -850mV CSE polarized criteria and the 100mV shift (depole) for a secondary method. This is consistent with discussions I had with CNGC's CP program manager during the Walla Walla portion of this inspection.

No probable violations or areas of concern were noted during this inspection. (Walla Walla Unit)

In the Walla Walla inspection discussed the importance of taking PSP readings by performing an "instant off" check to eliminate IR drop and CNGC indicated they were already working to update the procedure. This update will go through the Management of Change process and will be used in the field by April 2020.

Operations, maintenance and emergency response records were reviewed in the Walla Walla office. During the field portion of the inspection, we visited regulator stations, rectifiers, valves, odorant test sites, and CP test sites. I followed up on several non-compliance items identified by Scott Rukke in his 2016 inspection.

## Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	Walla Walla	Walla Walla	other	7807	Compressor Stations Storage Fields Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Abandoned	131	131	131	100.0%
2.	Bellingham	Bellingham	other	7808	Compressor Stations Storage Fields Offshore GOM OCS Cast or Ductile Iron Copper Pipe	131	131	129	98.5%

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
3.	Yakima	Yakima	other	7809	Aluminum pipe Abandoned Compressor Stations Storage Fields Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Abandoned	131	131	22	16.8%
4.	Shelton	Shelton	other	7810	Compressor Stations Storage Fields Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Abandoned	131	131	22	16.8%

1. Percent completion excludes unanswered questions planned as "always observe".

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Ost Type(s)	Extent	Notes
1.	Walla Walla	n/a	PRR	P, R, O, S	Detail	
2.	Bellingham	n/a	PRR	P, R, O, S	Detail	
3.	Yakima	n/a	PRR	P, R, O, S	Detail	
4.	Shelton	n/a	PRR	P, R, O, S	Detail	
5.	Walla Walla	n/a	FR	P, R, O, S	Detail	
6.	Bellingham	n/a	FR	P, R, O, S	Detail	
7.	Yakima	n/a	FR	P, R, O, S	Detail	
8.	Shelton	n/a	FR	P, R, O, S	Detail	
9.	Walla Walla	n/a	TQ.PROT9.CORRECTION.O	P, R, O, S	Detail	
10.	Bellingham	n/a	TQ.PROT9.CORRECTION.O	P, R, O, S	Detail	
11.	Yakima	n/a	TQ.PROT9.CORRECTION.O	P, R, O, S	Detail	
12.	Shelton	n/a	TQ.PROT9.CORRECTION.O	P, R, O, S	Detail	
13.	Walla Walla	n/a	TQ.PROT9.QUALIFICATIONSTATUS.O	P, R, O, S	Detail	
14.	Yakima	n/a	TQ.PROT9.QUALIFICATIONSTATUS.O	P, R, O, S	Detail	
15.	Shelton	n/a	TQ.PROT9.QUALIFICATIONSTATUS.O	P, R, O, S	Detail	
16.	Bellingham	n/a	TQ.PROT9.TASKPERFORMANCE.O	P, R, O, S	Detail	
17.	Yakima	n/a	TQ.PROT9.TASKPERFORMANCE.O	P, R, O, S	Detail	
18.	Shelton	n/a	TQ.PROT9.TASKPERFORMANCE.O	P, R, O, S	Detail	
19.	Walla Walla	n/a	TQ.PROT9.AOCRECOG.O	P, R, O, S	Detail	
20.	Bellingham	n/a	TQ.PROT9.AOCRECOG.O	P, R, O, S	Detail	
21.	Shelton	n/a	TQ.PROT9.AOCRECOG.O	P, R, O, S	Detail	
22.	Walla Walla	n/a	TQ.PROT9.VERIFYQUAL.O	P, R, O, S	Detail	
23.	Yakima	n/a	TQ.PROT9.VERIFYQUAL.O	P, R, O, S	Detail	
24.	Yakima	n/a	TQ.PROT9.AOCRECOG.O	P, R, O, S	Detail	
25.	Walla Walla	n/a	TQ.PROT9.TASKPERFORMANCE.O	P, R, O, S	Detail	

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
26.	Bellingham	n/a	TQ.PROT9.QUALIFICATIONSTATUS.O	P, R, O, S	Detail	
27.	Bellingham	n/a	TQ.PROT9.VERIFYQUAL.O	P, R, O, S	Detail	
28.	Shelton	n/a	TQ.PROT9.VERIFYQUAL.O	P, R, O, S	Detail	

## Plan Implementations

Activity #	Activity Name	SMART Act#	Start Date	End Date	Focus Directive	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	Walla Walla	--	04/02/2019	04/05/2019	n/a	all planned questions	Walla Walla	all types	131	131	131	100.0%
2	Bellingham	--	05/14/2019	05/17/2019	n/a	all planned questions	all assets	all types	524	524	304	58.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".

## Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Walla Walla	COMPLETED	04/12/2019	Walla Walla	--

## Results (all values, 139 results)

148 (instead of 139) results are listed due to re-presentation of questions in more than one sub-group.

### PRR.REPORT: Reporting

1. Question Result, ID, References: **NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.7(d))**  
 Question Text: *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*  
 Assets Covered: Walla Walla, Bellingham  
 Result Notes: Bellingham - No Federal reportables since last inspection. There were 5 State reportables since 2017.  
  
 Walla Walla No such event occurred, or condition existed, in the scope of inspection review.  
  
 No federal incidents. They had 4 reportable incidents since 2016 per CNGC
2. Question Result, ID, References: **Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12)** (also presented in: GDIM.IMPL)  
 Question Text: *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*  
 Assets Covered: Walla Walla, Bellingham, Yakima, Shelton  
 Result Notes: Company Wide. There was one in 2018. It was a Continental fitting. Reviewed in the Walla Walla inspection.
3. Question Result, ID, References: **NA, RPT.RR.INCIDENTREPORT.R, 191.9(a)**

Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

4. Question Result, ID, References NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.9(b)

Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

5. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 191.11(a)

Question Text *Have complete and accurate Annual Reports been submitted?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes The annual reports are reviewed during the annual review inspection.

6. Question Result, ID, References NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b))

Question Text *Do records indicate safety-related condition reports were filed as required?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes No such event occurred, or condition existed, in the scope of inspection review. None for the three year inspection period Cascade wide.

7. Question Result, ID, References Sat, MO.GO.CUSTNOTIFY.R, 192.16(d) (192.16(a), 192.16(b), 192.16(c))

Question Text *Do records indicate the customer notification process satisfies the requirements of 192.16?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes I took a photograph of the mailer that goes out when a new customer sets up an account. This is a companywide practice.

8. Question Result, ID, References NA, RPT.RR.MAOPINCREASENOTIFY.R,

Question Text *Do records indicate submittal of a written plan of procedures to the commission at least forty-five days before uprating to a MAOP greater than 60 psig?*

Assets Covered Walla Walla, Bellingham

Result Notes No MAOP uprates over 60 psig.

9. Question Result, ID, References Sat, RPT.RR.DAILYCONSTRUCTIONRPT.R,

Question Text *Do records indicate daily construction and repair activities were emailed to the commission no later than 10 AM each day work is scheduled?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes We check crew inspections daily. CNGC has been on time with submittals.

## PRR.CORROSION: Corrosion Control

10. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text *Do records indicate qualification of personnel implementing pipeline corrosion control methods?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla Looked at OQ records for Dan Hamilton. He is the local district CP program manager. He supervises ground bed installation, troubleshooting.

Bellingham Theron Doughty 1/21/2024 CP records for PSPs, rectifiers, .etc. He is the area CP RP.

11. Question Result, ID, References Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla I reviewed March and April Annual surveys for 2017 and 2018 for isolation, and the casing survey.

Bellingham 2019 Survey Kris Wainright 2/6/2019 - 2/25/2019 088-PS-0008 Britton and SR-542 -1474mV CNGC -1416mV (Outlet Williams) Tinker Razor Study was performed and demonstrated by Theron Doughty.

12. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a)

Question Text *Do records indicate the location of all items listed in 192.491(a)?*

Assets Covered Walla Walla, Bellingham

Result Notes The CP system records are maintained in the GIS.

13. Question Result, ID, References Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)

Question Text *Do records adequately document that exposed buried piping was examined for corrosion?*

Assets Covered Walla Walla, Bellingham

Result Notes CNGC Form 625. Integrity Management Dig Report. Reviewed for Walla Walla and Bellingham.

14. Question Result, ID, References Sat, TD.CP.MONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))

Question Text *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla Sept 2016 to March 2019 records. The bimonthly checks looked OK. They also have critical bonds on this list.

I discussed with Dustin Knowles the capabilities of the impressed current system. I asked when CNGC would be able to start taking instant offs. Dustin explained there were multiple current sources and rectifiers, but CNGC has a change to the procedure currently in the MOC process. CNGC will be following criteria in NACE SP-0169 and CFR Part 192 subpart I and Appendix D. By April 2020 Dustin indicated CNGC would be able to perform instant offs and would be using the -850mV CSE polarized criteria with a 100mV shift/depole as a secondary method to use.

Bellingham There is one critical bond on the list from CNGC to BP.

15. Question Result, ID, References Sat, TD.CP.MONITOR.TEST.R, 192.491(c) (192.465(a))

Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*

Assets Covered Walla Walla, Bellingham

Result Notes Checked PSP readings for each individual district

16. Question Result, ID, References Sat, TD.CP.MONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))

Question Text *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla had one and Bellingham has one. These are on the rectifier bimonthly checks.

17. Question Result, ID, References Sat, TD.CP.MONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))

Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla - The 650 form was for a low pipe to soil potential form and we also looked at originating document.

Bellingham - There was only one low CP reading for the last three years or since last inspection. It was remediated within the required time frame.

18. Question Result, ID, References **Sat, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))**  
 Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Although they have no unprotected piping. We looked at several records. This is on the 625 Form.**
19. Question Result, ID, References **Sat, TD.CP.MONITOR.TESTSTATION.R, 192.469**  
 Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Test stations are captured on the annual CP review.**
20. Question Result, ID, References **Sat, TD.CP.MONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))**  
 Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **CNGC has test stations installed and due the type of riser they use, they are able to have multiple test station locations at house piping, for example.**
21. Question Result, ID, References **Sat, TD.CP.MONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))**  
 Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **I reviewed two documents in Walla Walla. One for a short at the gate station and another for critical bond.**  
  
**In Bellingham we reviewed two similar documents, one for a short at house piping, and a bimonthly read that required additional readings. There is one critical bond on the list from CNGC to BP.**
22. Question Result, ID, References **NA, FS.FG.CASINGTESTLEAD.R,**  
 Question Text *Do records indicate that all casings without vents installed after September 5, 1992 had separate test lead wires installed?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **None**
23. Question Result, ID, References **Sat, FS.FG.CASINGSEALS.R,**  
 Question Text *Do records indicate that mains and service lines installed in casing or conduit are sealed at the ends as required?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **As built Form 336 in Walla Walla were provided for mains. Services are in the CP and UTC inspectors check for conduit and/or casing seals during DTC inspections.**
24. Question Result, ID, References **NA, TD.ICP.CORRGAS.R, 192.491(c) (192.475(a))**  
 Question Text *Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. No history of corrosive gas.**
25. Question Result, ID, References **Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))**  
 Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Form 315R, 315, 336, 336C and 625 document this. Examples were reviewed**

26. Question Result, ID, References **NA, TD.ICP.CORRGASACTION.R, 192.491(c) (192.477)**  
 Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review. Please see response to previous inspection.**
27. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))**  
 Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **It is its own program and is done in electronic reporting. Annual regulator stations are done annually. Above ground valves are included in the annual AC review.**  
  
**We checked on several specific addresses. The UTC inspection team picked several and reviewed the recent 2015 hard copy records prior to PCAD entries.**
28. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a))**  
 Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **This is on the 315 (Service Line) and 336 (Main) forms as well. I reviewed 10-15 for Walla Walla and for Bellingham. Plastic pipe is not coated, but checked for gouges on either form. Steel pipe external condition is also documented.**
29. Question Result, ID, References **NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))**  
 Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **This is a transmission line question. Please remove from this inspection type. No such relevant facilities/equipment existed in the scope of inspection review.**
30. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))**  
 Question Text *Do records document adequate evaluation of internally corroded pipe?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **This is a transmission line question. Please remove from this inspection type. No such relevant facilities/equipment existed in the scope of inspection review.**

## PRR.PT: Pressure Test

31. Question Result, ID, References **Sat, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.517(b) (192.509(a), 192.509(b))**  
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.509(a)?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **The 315 for the service lines. I checked 6 jobs in Walla Walla and in Bellingham. These are also checked in DTC inspections.**
32. Question Result, ID, References **Sat, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.517(a) (192.507(a), 192.507(b), 192.507(c))**  
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.507?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Walla Walla - There was a regulator station (WO 254350 and 254178) had multiple pressure tests for various components used. Test medium, gauge calibration, temp readings (if required) time of test, .etc were reviewed. There was a typo on the job copies for the temp recorder, but they produced the correct copy and it was a non-issue.**  
  
**Bellingham - WO #242959 (Reg Station R-172) and #254159 (Everson 4" relocate) Reviewed-OK**

33. Question Result, ID, References **Sat, DC.PT.SERVICELINE.R, 192.517(b) (192.511(a), 192.511(b), 192.511(c))**  
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.511?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **I reviewed pressure test gauges, materials, and chart recorder calibration. We looked at 293 Forms**
34. Question Result, ID, References **Sat, DC.PT.PRESSTESTPLASTIC.R, 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))**  
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.513?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **I reviewed several 315 forms (New install).**

## PRR.UPRATE: Uprating

35. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASE.R, 192.553(a) (192.553(b), 192.553(c))**  
 Question Text *Do records indicate that increases in MAOP of pipeline were determined in accordance with 192.553?*  
 Assets Covered **Bellingham**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
36. Question Result, ID, References **Sat, MO.GOUPRATE.MAOPINCREASE.R, 192.553(a) (192.553(b), 192.553(c))**  
 Question Text *Do records indicate that increases in MAOP of pipeline were determined in accordance with 192.553?*  
 Assets Covered **Walla Walla**  
 Result Notes **Walla Walla In 2016 CNGC dropped the pressure due to some audit findings. CNGC dropped the pressure to 38 and then brought it up to 60 MAOP and leak surveyed in between increases. A pressure test was done. The incremental uprate finished in 2017.**
37. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASELIMIT.R, 192.553(b) (192.553(c), 192.553(d), 192.557(a))**  
 Question Text *Do records indicate that increases in MAOP are limited in accordance with 192.519 and 192.621?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
38. Question Result, ID, References **Sat, MO.GOUPRATE.MAOPINCREASEPREP.R, 192.553(b) (192.553(c), 192.553(a), 192.557(b), 192.557(c))**  
 Question Text *Do records indicate that increases in MAOP were preceded by the actions specified in 192.557?*  
 Assets Covered **Walla Walla**  
 Result Notes **CNGC performed in Walla Walla (3 staged pressure increases) with leak surveys between each increase.**
39. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASEPREP.R, 192.553(b) (192.553(c), 192.553(a), 192.557(b), 192.557(c))**  
 Question Text *Do records indicate that increases in MAOP were preceded by the actions specified in 192.557?*  
 Assets Covered **Bellingham**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## PRR.OM: Operations And Maintenance

40. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: MISCTOPICS.PUBAWARE)**  
 Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **CNGC does this through PAPA for Walla Walla. Bill Bloom does the in person 1001 form. In Bellingham, they email the 1001 form. This was done May 11, 2018 and in March 2017.**



41. Question Result, ID, References **Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)**  
 Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*  
 Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
 Result Notes **The sheet that has the procedure review date was reviewed. It contains the review dates from 2016-2018**
42. Question Result, ID, References **Sat, MO.RW.MARKERREPLACE.R,**  
 Question Text *Do records indicate that damaged or missing markers were replaced within forty-five days of discovery?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Walla Walla - Markers are typically replaced during patrols and leak surveys as they are found. I looked at WO 5418184988 on 5-4-18 that had "ROW markers need to be replaced". The work was completed on 5-23-2018.**  
  
**Bellingham - We looked at 4-14 and repaired 5-9, 2017. WO#8736800296**
43. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: MISCTOPICS.PUBAWARE)**  
 Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*  
 Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
 Result Notes **CNGC report includes emergency responders, excavators, affected public, and public officials. The report was produced by the Culver Company for August 21, 2018. I reviewed the report for the affected public. Some take aways that the surveys of could ask different questions.**
44. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: MISCTOPICS.PUBAWARE)**  
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
 Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
 Result Notes **Spanish is the secondary language.**
45. Question Result, ID, References **NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5) (also presented in: MISCTOPICS.PUBAWARE)**  
 Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*  
 Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
 Result Notes **CNGC is not a master meter or LPG operator.**
46. Question Result, ID, References **Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))**  
 Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*  
 Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
 Result Notes **CNGC uses a GIS Silverlight web viewer. Maps and O&M manuals are available to field staff when I have inquired about maps and records in the field.**
47. Question Result, ID, References **Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))**  
 Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Walla Walla - Looked at 2016, 2017, and 2018 jobs. Bill Bloom and Phil Barber both performed inspections for CNGC.**  
  
**Bellingham - Looked at records from 2017-2018. Joel Johnstone performed**
48. Question Result, ID, References **Sat, MO.RW.DISTPATROL.R, 192.603(b) (192.721(a), 192.721(b))**  
 Question Text *Do records indicate distribution patrolling was conducted as required?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla - I reviewed 2017 and 2018 bridge and RR patrols. No leaks or issues found. I checked calibration dates for the equipment.

Bellingham - Darren T reviewed patrols for 2017-2018.

49. Question Result, ID, References Sat, MO.RW.DISTPATROLLEAKAGE.R, 192.603(b) (192.723(a), 192.723(b))

Question Text *Do records indicate distribution leakage surveys were conducted as required?*

Assets Covered Walla Walla

Result Notes Walla Walla - Retired service Section 4 College 9/26/2016 was in 8867820894 (Line retired 5/17/2017) and 5508810832 (8/29/2017 Soaped and left good) followed up on.

3433889678 WO from 5-7-2018 5-21-2018 repaired ERT.

209-223 West Poplar St, Walla Walla (2016 findings SR) Map 6H 5/15/2018 survey was completed

401 West Main (405 and 420) 5/15/2018 survey was completed.

Also looked at the additional locations Scott Rukke noted in his last inspection to ensure they are still being consistently leak surveyed.

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Bellingham - Section 1 (Bus Dist) Lynden 17,18 2018 Serial # 1501408003 cal 7-25-2018 8-1-2018 usage data

The list of the rest of the leak survey maps reviewed are contained in the scanned attachment (To be added to IA)

50. Question Result, ID, References NA, MO.RW.MARKERSMAPSDRAW.R,

Question Text *Are records sufficient to indicate class location and other areas where pipeline markers are required?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

51. Question Result, ID, References Sat, MO.RW.MARKERSURVEY.R,

Question Text *Do records indicate that pipeline marker surveys were completed and completed in the timeframe specified by WAC 480-93-124?*

Assets Covered Walla Walla, Bellingham

Result Notes Annual marker surveys were conducted and reviewed during the inspection for business districts and high pressure lines.

52. Question Result, ID, References NA, MO.RW.TRANSLEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b))

Question Text *Do records indicate transmission leakage surveys conducted as required?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

53. Question Result, ID, References NA, MO.RW.TRANSPATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))

Question Text *Do records indicate that transmission line ROW surface conditions have been patrolled as required?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

54. Question Result, ID, References NA, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes (c) *Abnormal operation*. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded: This is a transmission line question and would be better placed in the transmission inspection question set.

55. Question Result, ID, References Sat, PD.OC.PDPROGRAM.R, 192.614(c)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes Checked 3 samples and had CNG pull 2018 and 2019. I reviewed the the excavator list. The quarterly reports also have high risk excavators listed that cause damage more than twice in a two year period.

56. Question Result, ID, References NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*

Assets Covered Walla Walla, Bellingham, Yakima, Shelton

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. This is for the transmission inspection unit.

57. Question Result, ID, References Sat, EP.ERG.POSTEVTNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla - Form 234 (It was on the old 30 day report. I reviewed several 30 day reports and one had room for improvement noted by CNGC staff internally. It was in regards with taking pictures during an incident for documentation.

Bellingham - I reviewed several 30 day reports from 2017 to the present during this portion of the inspection.

58. Question Result, ID, References Sat, EP.ERG.TRAINING.R, 192.605(a) (192.615(b)(2))

Question Text *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla - Looked at semi-annual training sign in sheets for 2017 and 2018. All had employee names and signatures.

Bellingham - CNGC provided records for semi-annual training. 2017-2018.

59. Question Result, ID, References NA, EP.ERG.INCIDENTANALYSIS.R, 192.605(a) (192.617)

Question Text *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?*

Assets Covered Walla Walla, Bellingham

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

60. Question Result, ID, References Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.619(a) (1192.619(b), 192.621(a), 192.621(b), 192.623(a), 192.623(b))

Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*

Assets Covered Walla Walla, Bellingham

Result Notes 315 and the 336 forms (service lines and mains)

61. Question Result, ID, References Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla and Bellingham Monthly records were reviewed for 2017 and 2018 including odorator calibration records. Odorator 5110-0200 was checked for calibration for both years when it was used. There were no missed months. Gas is well, but not over odorized.

62. Question Result, ID, References Sat, AR.RMP.TESTREINSTATE.R, 192.603(b) (192.725(a), 192.725(b))

Question Text *From the review of records, did the operator properly test disconnected service lines?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla - I checked records for 2017-2018 15-20 records or so. All had pressure tests associated with them.

Bellingham - I looked at the 293s (Leak Work Orders)

63. Question Result, ID, References NA, MO.GM.MOVEANDLOWER.R,

Question Text *Do records indicate that a study was prepared before moving or lowering a steel gas pipeline as required?*

Assets Covered Walla Walla, Bellingham

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

64. Question Result, ID, References NA, MO.GM.MOVEANDLOWERSURVEY.R,

Question Text *Do records indicate that a leak survey was conducted not more than thirty days after moving and/or lowering a metallic pipeline?*

Assets Covered Walla Walla, Bellingham

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

65. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))

Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla - Looked at R-1 and R-3 annuals.

Bellingham. Regulator Stations R-141, 43, 122, 109, 41, 13 (reviewed WOs), 23 (reviewed WOs)

R-96/R-72 had the bolts noted as being too short and they were replaced). Additionally, R-19, R-154 were off-line during the regularly scheduled maintenance window.

66. Question Result, ID, References Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))

Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required and a new or additional device installed if determined to have insufficient capacity?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla - Checked several years of records for capacity review R-2 was retired and replaced by R-3.

Bellingham - 2017 and 2018 capacity checks were reviewed. (Checked out OK)

67. Question Result, ID, References Sat, MO.GM.DISTVALVEINSPECT.R, 192.603(b) (192.747(a), 192.747(b))

Question Text *Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?*

Assets Covered Walla Walla, Bellingham

Result Notes Walla Walla - Checked Operational Valves and Service Line Valves. Both are looked at annually. No interval or systemic issues with valves sticking or not being operational year to year.

Bellingham - V-59, V-66, V-114, V-135, SV-047, and SV-042 were reviewed by Darren and I reviewed several others.

68. Question Result, ID, References **NA, FS.FG.VAULTINSPECTFAC.R, 192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d))**  
Question Text *Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. No vaults of this size.**
69. Question Result, ID, References **Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))**  
Question Text *Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **Walla Walla - CP 760 and CP 635 have this process. CNGC's field personnel are trained to the procedure. Fire extinguishers are used during hot tapping procedures and records are on the JSA. 10-03-2018 (Keith Towne). The form number is 526.**  
  
**Bellingham - The 640 form tracks for fire extinguishers on site. The squeeze procedure is 607. The step is 8.8.2.**
70. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELD.R, 192.225(a) (192.225(b))**  
Question Text *Do records indicate weld procedures are being qualified in accordance with 192.225?*  
Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
Result Notes **This is an Appendix to the CP - Weld procedures They were qualified in 2001.**
71. Question Result, ID, References **Sat, TO.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))**  
Question Text *Do records indicate adequate qualification of welders?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **I looked at OQs for the welders. This is also checked regularly in DTC inspections.**
72. Question Result, ID, References **Sat, TO.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))**  
Question Text *Do records indicate the qualification of nondestructive testing personnel?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **Bellingham - DPT reviewed R-172 and the Everson 4"**
73. Question Result, ID, References **Sat, DC.CO.PLASTICJOINTPROCEDURE.R, 192.273(b) (192.283(a), 192.283(b), 192.283(c), 192.283(d))**  
Question Text *Have plastic pipe joining procedures been qualified in accordance with 192.283?*  
Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
Result Notes **The TR-33/2006 PPI was adopted. They have been qualified for new joining 8.25 in CP 607.**
74. Question Result, ID, References **Sat, DC.CO.PLASTICJOINTQUAL.R, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.807(a), 192.807(b))**  
Question Text *Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **Walla Walla - Kris Margart has heater plate and electrofusion. Michels is used here as a sole contractor.**  
  
**Bellingham - Brandon Aguilar, and Tony Farruggia, Cody Miller.**
75. Question Result, ID, References **Sat, DC.CO.PLASTICJOINTINSR.R, 192.287 (192.807(a), 192.807(b))**  
Question Text *Do records indicate persons inspecting the making of plastic pipe joints have been qualified?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **Phil Barber has this on the construction inspection for Walla Walla. In Bellingham we looked at the 640 checklist, Joel Johnstone perfoms this in Bellingham.**

76. Question Result, ID, References **Sat, DC.CO.PLASTICPIPESEP.R,**  
 Question Text *Do records indicate minimum separation requirements are met for plastic pipelines?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **CP 607 has 12" or greater of separation. 315R has min distance from other utilities.**
77. Question Result, ID, References **Sat, DC.METERREGSVC.REGTEST.R,**  
 Question Text *Do records indicate that service regulators have been installed, operated, maintained, tested during initial turn-on and tested when customers experience pressure problems?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Walla Walla - PCAD order shows several records from 2018 that have new meters installed and the pressure is checked for set pressure and lockup.**  
  
**Bellingham - We also reviewed 3 PCAD orders.**
78. Question Result, ID, References **Sat, MO.RW.LEAKFOLLOW.R,**  
 Question Text *Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Walla Walla There was one record from 2018 and several from 2017 reviewed during the inspection.**  
  
**Bellingham We reviewed 20-30**
79. Question Result, ID, References **NA, MO.RW.DOWNGRADELEAKREPAIR.R,**  
 Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*  
 Assets Covered **Bellingham**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
80. Question Result, ID, References **Sat, MO.RW.DOWNGRADELEAKREPAIR.R,**  
 Question Text *Do records indicate that leaks that have been downgraded are repaired within twenty-one months?*  
 Assets Covered **Walla Walla**  
 Result Notes **Nothing in 2017 that was downgraded. 2018 there was one.**
81. Question Result, ID, References **Sat, MO.RW.LEAKREPAIRTIME.R,**  
 Question Text *Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **I reviewed leak work orders and leak records. No issues were found.**
82. Question Result, ID, References **Sat, MO.RW.LEAKRECORDS.R,**  
 Question Text *Have gas leak records been prepared and maintained as required?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **We checked this for all the records reviewed in 2017 and 2018.**
83. Question Result, ID, References **NA, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))**  
 Question Text *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

## FR.FIELDPIPE: Pipeline Inspection (Field)

84. Question Result, ID, References **Sat, DC.MA.MARKING.O, 192.63(a) (192.63(b), 192.63(c), 192.63(d))**  
Question Text *Are pipe, valves, and fittings properly marked for identification?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **Walla Walla - I checked Pipe storage and marking of MDPE 1" and 2" in the Walla Walla yard.**  
**Bellingham - Storage and pipe dates were also checked in Bellingham.**
85. Question Result, ID, References **NA, DC.DPC.GDVALVEPLACEMENT.O, 192.141 (192.181(a), 192.181(b), 192.181(c))**  
Question Text *Are distribution line valves being installed as required of 192.181?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **No such activity/condition was observed during the inspection.**
86. Question Result, ID, References **NA, DC.METERREGSVC.CUSTOMETERREGLOC.O, 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))**  
Question Text *Are meters and service regulators being located consistent with the requirements of 192.353?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **No such activity/condition was observed during the inspection.**
87. Question Result, ID, References **Sat, DC.METERREGSVC.CUSTOMETERREGPROT.O, 192.351 (192.355(a), 192.355(b), 192.355(c))**  
Question Text *Are meters and service regulators being protected from damage consistent with the requirements of 192.355?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **No meters were observed that were exposed to potential vehicular damage or damage from outside forces.**
88. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20) (also presented in: ATT1FR.FIELDCS)**  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **I did not observe any marker spacing, placement, or damage issues during this inspection. Signage and markers were suitably spaced, from what I observed, while inspecting the Walla Walla distribution system.**
89. Question Result, ID, References **Sat, MO.RW.ROWMARKERABOVE.O, 192.707(c) (CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20) (also presented in: ATT1FR.FIELDCS)**  
Question Text *Are line markers placed and maintained as required for above ground pipelines?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **No issues associated with marker placement in the units observed**
90. Question Result, ID, References **NA, DC.METERREGSVC.CUSTOMETERREGINSTALL.O, 192.351 (192.357(a), 192.357(b), 192.357(c), 192.357(d))**  
Question Text *Are meters and service regulators being installed consistent with the requirements of 192.357?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **No such activity/condition was observed during the inspection.**
91. Question Result, ID, References **NA, DC.METERREGSVC.CUSTOMETEROPPRESS.O, 192.351 (192.359(a), 192.359(b), 192.359(c))**  
Question Text *Are customer meter operating pressures consistent with the requirements of 192.359?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **No such activity/condition was observed during the inspection.**
92. Question Result, ID, References **NA, DC.METERREGSVC.SVCLINEINSTALL.O, 192.351 (192.361(a), 192.361(b), 192.361(c), 192.361(d), 192.361(e), 192.361(f), 192.361(g))**  
Question Text *Are customer service lines being installed consistent with the requirements of 192.361?*  
Assets Covered **Walla Walla, Bellingham**  
Result Notes **No such activity/condition was observed during the inspection.**

93. Question Result, ID, NA, DC.METERREGSVC.SVCLINEVLVLOCATEREQT.O, 192.351 (192.363(a), 192.363(b), 192.363(c),  
References 192.365(a), 192.365(b), 192.365(c))  
Question Text *Are customer service line valves being installed meeting the valve and locations requirements of 192.363 and 192.365?*  
Assets Covered Walla Walla, Bellingham  
Result Notes No such activity/condition was observed during the inspection.
94. Question Result, ID, NA, DC.METERREGSVC.SVCLINECONNECT.O, 192.351 (192.367(a), 192.367(b), 192.369(a), 192.369(b))  
References 192.367(a), 192.367(b), 192.369(a), 192.369(b))  
Question Text *Are customer service lines being installed with connections meeting the requirements of 192.367 and 192.369?*  
Assets Covered Walla Walla, Bellingham  
Result Notes No such activity/condition was observed during the inspection.
95. Question Result, ID, NA, DC.METERREGSVC.SVCLINEMATERIAL.O, 192.351 (192.371, 192.373(a), 192.373(b), 192.373(c),  
References 192.375(a), 192.375(b), 192.377)  
Question Text *Are customer service lines being installed constructed appropriately for the types of materials used?*  
Assets Covered Walla Walla, Bellingham  
Result Notes No such activity/condition was observed during the inspection.
96. Question Result, ID, NA, DC.METERREGSVC.NEWSVCLINENOTUSED.O, 192.351 (192.379, 192.379(a), 192.379(b),  
References 192.379(c))  
Question Text *Are new customer service lines not in use configured in accordance with the requirements of 192.379?*  
Assets Covered Walla Walla, Bellingham  
Result Notes No such activity/condition was observed during the inspection.
97. Question Result, ID, NA, DC.METERREGSVC.EXCSFLOWVLVLOCATE.O, 192.351 (192.381(c), 192.381(d), 192.381(e))  
References 192.381(c), 192.381(d), 192.381(e))  
Question Text *Are service line excess flow valves located and identified in accordance with the requirements of 192.381?*  
Assets Covered Walla Walla, Bellingham  
Result Notes No such activity/condition was observed during the inspection.
98. Question Result, ID, NA, DC.METERREGSVC.REGTEST.O,  
References NA, DC.METERREGSVC.REGTEST.O,  
Question Text *Are service regulators operated, maintained, installed and tested during the initial turn-on in accordance with manufacturer's recommendations and WAC requirements?*  
Assets Covered Walla Walla, Bellingham  
Result Notes No such activity/condition was observed during the inspection.
99. Question Result, ID, NA, TD.COAT.NEWPIPEINSTALL.O, 192.461(d)  
References NA, TD.COAT.NEWPIPEINSTALL.O, 192.461(d)  
Question Text *Is external protective coating being protected from damage that could result from adverse ditch conditions or supporting blocks?*  
Assets Covered Walla Walla, Bellingham  
Result Notes No such activity/condition was observed during the inspection.
100. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(b), 192.463(c))  
References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(b), 192.463(c))  
Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*  
Assets Covered Bellingham  
Result Notes We observed flange isolation testing using the Tinker Razor RF-IT at the Williams Gate, rectifier, casing checks, and PSP readings. No issues with equipment calibration, use, or field readings was noted.
101. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(b), 192.463(c))  
References Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(b), 192.463(c))  
Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*  
Assets Covered Walla Walla



- Result Notes CNGC Service Mechanics performed PSP readings, checked a critical bond, and tested a rectifier during the inspection.
102. Question Result, ID, References Sat, TD.CP.MONITOR.CURRENTTEST.O, 192.465(b)  
 Question Text *Are impressed current sources properly maintained and are they functioning properly?*  
 Assets Covered Walla Walla, Bellingham  
 Result Notes Several rectifiers were tested during the inspection.
103. Question Result, ID, References Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))  
 Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*  
 Assets Covered Bellingham  
 Result Notes Casing/carrier isolation and system isolation (up and downstream) was spot checked during the field portion on the inspection.
104. Question Result, ID, References Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))  
 Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*  
 Assets Covered Walla Walla  
 Result Notes Casings and customer piping was inspected to ensure that current isolation was occurring where needed.
105. Question Result, ID, References Sat, TD.CP.MONITOR.TESTSTATION.O, 192.469  
 Question Text *Do cathodically protected pipelines have a sufficient number of test stations?*  
 Assets Covered Walla Walla, Bellingham  
 Result Notes The test stations were sufficient.
106. Question Result, ID, References Sat, TD.CP.MONITOR.TESTLEAD.O, 192.471(a)  
 Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*  
 Assets Covered Walla Walla, Bellingham  
 Result Notes There were no issues with any test leads during the field observation portion of the inspection.
107. Question Result, ID, References Sat, FS.FG.CASING.O,  
 Question Text *Are all casings bare steel and do they have test leads installed on new casings without vents?*  
 Assets Covered Walla Walla, Bellingham, Yakima, Shelton  
 Result Notes The casings we observed all had vents installed are bare steel.
108. Question Result, ID, References NA, FS.FG.CASESEAL.O,  
 Question Text *Does the operator seal both ends of casings/conduits for mains and transmission lines and seal the end nearest the building for service lines?*  
 Assets Covered Walla Walla, Bellingham  
 Result Notes No such activity/condition was observed during the inspection. For, service lines this would be addressed during our DTC inspections
109. Question Result, ID, References NA, TD.CP.MONITOR.INTFRCURRENT.O, 192.473(a)  
 Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*  
 Assets Covered Bellingham  
 Result Notes No such activity/condition was observed during the inspection. There is a critical bond between CNGC and BP, but it was not visited during the field portion of the inspection.

110. Question Result, ID, References **Sat, TD.CP.MONITOR.INTFRCURRENT.O, 192.473(a)**  
 Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*  
 Assets Covered **Walla Walla**  
 Result Notes **There is a critical bond located at the Williams Gate Station that has a resistor that is adjustable to throttle the flow of current leaving CNGCs line.**
111. Question Result, ID, References **Sat, TD.CP.ADJACENTMETAL.O, 192.473(b)**  
 Question Text *Are impressed current type cathodic protection systems and galvanic anode systems installed so as to minimize any adverse effect on existing adjacent underground metallic structures?*  
 Assets Covered **Walla Walla**  
 Result Notes **The foreign structures tested during the inspection did not show signs of interference from CNGC. CNGC is utilizing a critical bond at the gate station, however, to ensure Williams' current can safely leave CNGCs pipe without causing any metal loss.**
112. Question Result, ID, References **NA, TD.ICP.CORRGASPRVNT.O, 192.475(a)**  
 Question Text *If the transportation of corrosive gas is not allowed, is the transportation of corrosive gas prevented?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
113. Question Result, ID, References **NA, TD.ICP.CORRGASACTION.O, 192.477**  
 Question Text *Are adequate actions taken when corrosive gas is being transported by pipeline?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
114. Question Result, ID, References **NA, TD.ICP.PIPEBOTTLE.O, 192.475(c)**  
 Question Text *Is gas containing more than 0.25 grain of hydrogen sulfide per 100 standard cubic feet (5.8 milligrams/m<sup>3</sup>) at standard conditions (4 parts per million) being stored in pipe-type or bottle-type holders?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **No such activity/condition was observed during the inspection.**
115. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))** (also presented in: ATT1FR.FIELDSCS, ATT1FR.FIELDSCS)  
 Question Text *Is pipe that is exposed to atmospheric corrosion protected?*  
 Assets Covered **Walla Walla**  
 Result Notes **During the Walla Walla inspection, each regulator station was visited and inspected for atmospheric corrosion. Additionally, meters and service risers were checked for AC. All sites chosen were in good or excellent condition for remaining coating and wrap.**
116. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))** (also presented in: ATT1FR.FIELDSCS, ATT1FR.FIELDSCS)  
 Question Text *Is pipe that is exposed to atmospheric corrosion protected?*  
 Assets Covered **Bellingham**  
 Result Notes **Sites visited were well coated and wrapped.**
117. Question Result, ID, References **NA, AR.RCOM.REMEDIATIONOM.O, 192.487(a) (192.487(b))**  
 Question Text *Is anomaly remediation and documentation of remediation adequate for all segments?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **No such activity/condition was observed during the inspection.**
118. Question Result, ID, References **Sat, MO.GOODOR.ODORIZE.O, 192.625(a) (192.625(c), 192.625(d), 192.625(e), 192.625(f))**  
 Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*

Assets Covered Walla Walla, Bellingham

Result Notes A calibrated odorator was used to verify the concentration of odorant suspended in the gas at test locations near the end of the pipeline system. It was well odorized. See each unit's documentation for actual field readings.

119. Question Result, ID, References NA, MO.GO.PURGE.O, 192.629(a) (192.629(b))

Question Text *Are lines being purged in accordance with 192.629?*

Assets Covered Walla Walla, Bellingham

Result Notes No such activity/condition was observed during the inspection.

120. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b))

Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*

Assets Covered Walla Walla, Bellingham

Result Notes Relief devices were inspected at the regulator stations visited during the field portion of the inspection. Gauges were checked beforehand and the inlet and outlet set points were checked along with the lockup check.

The regulator stations visited all were within the allowable set points and operated correctly. Working regulators were not set above MAOP and the relief devices all functioned properly within the desired set points to prevent overpressure conditions.

121. Question Result, ID, References NA, MO.GMOPP.PRESSREGMETER.O, 192.741(a) (192.741(b), 192.741(c))

Question Text *Are telemetering or recording gauges properly utilized as required for distribution systems?*

Assets Covered Walla Walla, Bellingham

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

122. Question Result, ID, References NA, MO.GMOPP.MULTIPRESSREG.O,

Question Text *Are regulator stations installed in a manner to provide protection between regulator stages?*

Assets Covered Walla Walla, Bellingham

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

The regulator stations employed single cut regulators.

123. Question Result, ID, References Sat, MO.GM.DISTVALVEINSPECT.O, 192.747(a) (192.747(b))

Question Text *Is proper inspection and partial operation being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?*

Assets Covered Walla Walla, Bellingham

Result Notes All valves I selected and checked as we were in the field operated correctly. In Bellingham, the operator also greased each valve zerk before operating per the CNGC procedure.

124. Question Result, ID, References NA, MO.GM.VAULTINSPECT.O, 192.749(a) (192.749(b), 192.749(c), 192.749(d))

Question Text *Are vault inspections adequate?*

Assets Covered Walla Walla, Bellingham

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

125. Question Result, ID, References NA, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))

Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*

Assets Covered Walla Walla, Bellingham

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

126. Question Result, ID, References NA, AR.PTI.PLASTICPRESSURETEST.O,

Question Text *Is plastic pipe installed and backfilled prior to pressure testing?*

Assets Covered Walla Walla, Bellingham

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

127. Question Result, ID, References Sat, AR.PTI.EQUIPCALIB.O,

Question Text *Is pressure testing equipment calibrated according to calibration schedules and procedures?*

Assets Covered Walla Walla, Bellingham

Result Notes I verified gauges and all other testing equipment before conducting the field inspection.

128. Question Result, ID, References Sat, DC.CO.PLASTICPIPEPROC.O,

Question Text *Is plastic pipe handled, stored and installed in accordance with manufacturer's recommendations, including maximum ultraviolet exposure?*

Assets Covered Walla Walla, Bellingham

Result Notes I checked the pipe storage yard in Walla Walla and Bellingham. The pipe was stored appropriately and did not exceed the UV exposure time threshold.

129. Question Result, ID, References NA, DC.CO.PLASTICWEAKLINK.O,

Question Text *Is a weak link installed when pulling plastic pipe by mechanical means?*

Assets Covered Walla Walla, Bellingham

Result Notes No such activity/condition was observed during the inspection.

130. Question Result, ID, References NA, DC.CO.PLASTICPIPESEP.O,

Question Text *Are plastic pipelines installed with the minimum separation from other utilities as required?*

Assets Covered Walla Walla, Bellingham

Result Notes No such activity/condition was observed during the inspection.

131. Question Result, ID, References NA, DC.CO.PLASTICBACKFILL.O,

Question Text *Is plastic pipe buried in essentially rock-free material or material recommended by the pipe manufacturer?*

Assets Covered Walla Walla, Bellingham

Result Notes No such activity/condition was observed during the inspection.

132. Question Result, ID, References NA, DC.CO.PLASTICSQUEEZING.O,

Question Text *Is the number of times plastic pipe can be squeezed and how far from fittings plastic pipe can be squeezed limited?*

Assets Covered Walla Walla, Bellingham

Result Notes No such activity/condition was observed during the inspection.

133. Question Result, ID, References Sat, MO.GM.ONSITEPROCS.O,

Question Text *Are procedures applicable to the work being done located onsite where the work is being done?*

Assets Covered Walla Walla, Bellingham

Result Notes The procedures I reviewed in the field for the bond reading and the rectifier check were on-site and relevant to the work being done in Walla Walla. In Bellingham, the procedures were also available in the trucks, but I did not require CNGC to produce them at the time of inspection.

## ATT1FR.FIELDCS: Compressor Stations Inspection (Field)

134. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20) (also presented in: FR.FIELDPIPE)

Question Text *Are line markers placed and maintained as required?*

Assets Covered Walla Walla, Bellingham

Result Notes I did not observe any marker spacing, placement, or damage issues during this inspection. Signage and markers were suitably spaced, from what I observed, while inspecting the distribution systems.

135. Question Result, ID, [Sat, MO.RW.ROWMARKERABOVE.O, 192.707\(c\)](#) (CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20) (also presented in: [FR.FIELDPIPE](#))  
 Question Text *Are line markers placed and maintained as required for above ground pipelines?*  
 Assets Covered [Walla Walla, Bellingham](#)  
 Result Notes [No issues associated with marker placement in the units observed](#)
136. Question Result, ID, [Sat, TD.ATM.ATMCORRODEINSP.O, 192.481\(b\)](#) ([192.481\(c\)](#), [192.479\(a\)](#), [192.479\(b\)](#), [192.479\(c\)](#)) (also presented in: [FR.FIELDPIPE](#), [FR.FIELDPIPE](#))  
 Question Text *Is pipe that is exposed to atmospheric corrosion protected?*  
 Assets Covered [Bellingham](#)  
 Result Notes [Sites visited were well coated and wrapped.](#)
137. Question Result, ID, [Sat, TD.ATM.ATMCORRODEINSP.O, 192.481\(b\)](#) ([192.481\(c\)](#), [192.479\(a\)](#), [192.479\(b\)](#), [192.479\(c\)](#)) (also presented in: [FR.FIELDPIPE](#), [FR.FIELDPIPE](#))  
 Question Text *Is pipe that is exposed to atmospheric corrosion protected?*  
 Assets Covered [Walla Walla](#)  
 Result Notes [During the Walla Walla inspection, each regulator station was visited and inspected for atmospheric corrosion. Additionally, meters and service risers were checked for AC. All sites chosen were in good or excellent condition for remaining coating and wrap.](#)

## GDIM.IMPL: GDIM Implementation

138. Question Result, ID, [Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009](#) ([191.12](#)) (also presented in: [PRR.REPORT](#))  
 References  
 Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*  
 Assets Covered [Walla Walla, Bellingham, Yakima, Shelton](#)  
 Result Notes [Company Wide. There was one in 2018. It was a Continental fitting. Reviewed in the Walla Walla inspection.](#)

## MISCTOPICS.PROT9: OQ Field Inspection

139. Question Result, ID, [NA, TQ.PROT9.CORRECTION.O, 192.801\(a\)](#) ([192.809\(a\)](#))  
 References  
 Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*  
 Assets Covered [Walla Walla, Bellingham, Yakima, Shelton](#)  
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
140. Question Result, ID, [Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801\(a\)](#) ([192.809\(a\)](#))  
 References  
 Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*  
 Assets Covered [Walla Walla, Bellingham](#)  
 Result Notes [I verified OQ credentials for Adam Doherty PSP, rectifier \(exp 7/26/2022\), odorant testing \(exp 3/5/2023\), and regulator maintenance \(exp 3/9/2023\). Keith Towne's OQ records were checked for CP system testing 5/2/2021.](#)
- [In Bellingham, I verified OQ records reviewed for Kristopher Wainwright: CP Testing Exp 10/28/2020, Pressure Limiting Exp 3/26/2021, Odorant Sniff Testing Exp 3/20/2024](#)
141. Question Result, ID, [Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801\(a\)](#) ([192.809\(a\)](#))  
 References  
 Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*  
 Assets Covered [Bellingham](#)  
 Result Notes [The procedures were on site when performing the required field verification tests.](#)

142. Question Result, ID, References **Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))**  
 Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*  
 Assets Covered **Walla Walla**  
 Result Notes **The individuals had a copy of the procedure with them while performing the tasks.**
143. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a))**  
 Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **We discussed AOCs with the operator.**
144. Question Result, ID, References **Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))**  
 Question Text *Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **Qualifications were verified.**

## MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness

145. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: PRR.OM)**  
 Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*  
 Assets Covered **Walla Walla, Bellingham**  
 Result Notes **CNGC does this through PAPA for Walla Walla. Bill Bloom does the in person 1001 form. In Bellingham, they email the 1001. This was done May 11, 2018 and in March 2017.**
146. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: PRR.OM)**  
 Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*  
 Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
 Result Notes **CNGC report includes emergency responders, excavators, affected public, and public officials. The report was produced by the Culver Company for August 21, 2018. I reviewed the report for the affected public. Some lessons learned for CNGC were that the surveys could have asked some slightly different questions.**
147. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: PRR.OM)**  
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
 Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
 Result Notes **Spanish is the secondary language.**
148. Question Result, ID, References **NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5) (also presented in: PRR.OM)**  
 Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*  
 Assets Covered **Walla Walla, Bellingham, Yakima, Shelton**  
 Result Notes **CNGC is not a master meter or LPG operator.**

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Report Parameters: Results: all

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