



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via Email

September 28, 2023

Pat Darras
Vice President, Engineering & Operations Services
Cascade Natural Gas Corporation
400 North 4th St
Bismark, ND 58501

**RE: 2023 Natural Gas Anti-Drug and Alcohol Misuse Prevention Plan Inspection –
Cascade Natural Gas Corporation - Headquarters – (Insp. No. 8582)**

Dear Mr. Pat Darras:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Drug and Alcohol Testing Program Inspection of Cascade Natural Gas Corporation (Cascade) from September 12, 2023 to September 21, 2023. This inspection included a review of records and Cascade's DOT Anti-Drug and Alcohol Misuse Prevention Plan.

Our inspection indicates one area of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by October 30, 2023. The response should include how and when you plan to bring the area of concern into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on the area of concern and does not constitute a finding of probable violation by the staff at this time if the issue is resolved within 30 days of discovery.

If this issue is not resolved within 30 days, this matter may result in the issuance of a notice of probable violation.

Respect. Professionalism. Integrity. Accountability.

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If you have any questions or if we may be of any assistance, please contact Derek Norwood at (360) 259-2525. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Scott Rukke
Pipeline Safety Director

cc: Colby Lundstrom, Manager, Compliance & Operations Programs, Cascade
Josh Sanders, Director, Operations Policy & Procedures, Cascade
Mike Schoepp, Director, Operations Services, Cascade
Ryan Privratsky, Director, System Integrity, Integrity Management, Cascade

UTILITIES AND TRANSPORTATION COMMISSION
2023 Natural Gas Anti-Drug and Alcohol Misuse Prevention Plan Inspection
Cascade Natural Gas Corporation – Headquarters (Insp. No. 8582)

The following area of concern of Title 49 CFR Part 199 was noted as a result of the 2023 inspection of Cascade Natural Gas Corporation, Headquarters. The inspection included a review of records and Cascade’s DOT Anti-Drug and Alcohol Misuse Prevention Plan.

AREA OF CONCERN

1. **49 CFR §199.239(a)(2) Operator obligation to promulgate a policy on the misuse of alcohol.**
 - (a) *General requirements. Each operator shall provide educational materials that explain these alcohol misuse requirements and the operator's policies and procedures with respect to meeting those requirements.*
 - (1) *The operator shall ensure that a copy of these materials is distributed to each covered employee prior to start of alcohol testing under this subpart, and to each person subsequently hired for or transferred to a covered position.*
 - (2) *Each operator shall provide written notice to representatives of employee organizations of the availability of this information.*

Finding(s):

Through discussion with Oregon PUC, Cascade and commission staff, it was determined that the operator provides educational materials to all covered employees which includes employee organization representatives. However, there is no formal notification to the employee organizations. Cascade should clarify their process to ensure employee organizations are aware of the resources available to covered employees.