

# Inspection Output (IOR)

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## Report Filters

Assets All, and including items not linked to any asset.

Results All

## Inspection Information

Inspection Name	8586 CNG Transmission Standard Inspection	Operator(s)	CASCADE NATURAL GAS CORP (2128) Lead Derek Norwood	Plan Submitted	11/03/2023
Status	STARTED	Team Members	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson	Plan Approval	--
Start Year	2023	Observer(s)	John Trier, Marina Rathbun, Tom Green	All Activity Start	08/08/2023
System Type	GT	Supervisor	Dennis Ritter	All Activity End	10/05/2023
Protocol Set ID	WA.GT.2022.02	Director	Scott Rukke	Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

This inspection was a standard inspection of the transmission unit for Cascade Natural Gas. It included a records review and facility inspection at the various transmission segments throughout Washington state. The segments included transmission pipelines in Mount Vernon, Bellingham, Bremerton, Shelton and the Fredonia compressor station. Field inspection notes can be seen in Form R attached to the relevant observation question.

There were two probable violations and two areas of concern as described in the Results Letter and Report.

### Facilities visited and Total AFOD

Facilities visited include transmission pipelines, rectifiers, casings, regulator stations, etc. in Mount Vernon, Bellingham, Bremerton and Shelton along with Fredonia Compressor Station in Mount Venron

Total AFOD: 7 days

3 days of records and 4 days of field observations

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There were two probable violations and two areas of concern as described in the Results Letter and Report. The probable violations included missing compressor station performance test records (49 CFR 192.736) and missing patrolling records (49 CFR 192.705). The areas of concern were leak survey record keeping inefficiencies (WAC 480-93-018) and lack of clarity on the compressor station inspection form (49 CFR 192.736)

### Primary Operator contacts and/or participants

Colby Lundstrom, Manager Compliance and Operations Programs, MDU (509) 520-0718 colby.lundstrom@cngc.com

Wendy McDonough, Compliance Audit Specialist, MDU (509) 970-4156 wendy.mcdonough@mdu.com

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### Operator executive contact and mailing address for any official correspondence

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## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	88963 (1,877)	Cascade Natural Gas-TRANSMISSION	unit	88963	Bottle/Pipe - Holders Vault Service Line Gas Storage Field (Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP Abandoned	197	197	197	197	100.0%

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

## Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88963 (1,877)	WUTC Standard Inspection	AR, CR, DC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, UNGS, 114, GENERIC	P, R, O, S	Detail	--
2.	88963 (1,877)	--	--	P, R, O, S	Detail	--

## Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	Records	--	08/08/2023	--	10/05/2023	all planned questions	all assets	R	123	123	123	123	100.0%
2.	Field	--	08/21/2023	--	10/04/2023	all planned questions	all assets	O	74	74	74	74	100.0%

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	Records	COMPLETED	11/03/2023	Records	88963 (1,877)

## Results (all values, 197 results)

220 (instead of 197) results are listed due to re-presentation of questions in more than one sub-group.

### AR.PTI: Integrity Assessment Via Pressure Test

1. Question Result, ID, References Sat, AR.PTI.PRESSTESTREVQUAL.R, 192.947(g) (192.915(a), 192.915(b))

Question Text Do records demonstrate that operator/vendor personnel, including supervisors, who conduct or review pressure test assessment results are qualified for the tasks they perform?

Assets Covered 88963 (1,877)

Result Notes Reviewed Training and Experience worksheet for TIMP Team

2. Question Result, ID, References Sat, AR.PTI.PRESSTESTRESULT.R, 192.517(a) (192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d), 192.517(b), 192.617, 192.619(a), 192.919(e), 192.921(a)(2))

Question Text *Do the test records validate the pressure test?*

Assets Covered 88963 (1,877)

Result Notes Pressure test conducted on 8" Anacortes in 2021

Reviewed pressure test records (Attached)

No concerns

3. Question Result, ID, References NA, AR.PTI.PRESSTESTCOMPLETE.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.505(a), 192.505(b), 192.505(c), 192.505(d), 192.507(a), 192.507(b), 192.507(c), 192.513(a), 192.513(b), 192.513(c), 192.513(d))

Question Text *From field operations was the pressure test performed in accordance with Subpart J requirements and the process requirements?*

Assets Covered 88963 (1,877)

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

## AR.RMP: Repair Methods and Practices

4. Question Result, ID, References Sat, 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 88963 (1,877)

Result Notes Warning signs posted ignition sources removed

5. Question Result, ID, References NA, AR.RMP.WELDTTEST.O, 192.719(a) (192.719(b))

Question Text *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?*

Assets Covered 88963 (1,877)

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

## DC.COCMP: Compressor Station Construction

6. Question Result, ID, References Sat, DC.COCMP.CMPCOMBUSTIBLE.O, 192.735(a) (192.735(b), NFPA 30) (also presented in: FS.CS)

Question Text *Do field observations demonstrate that flammable/combustible materials are safely stored as required, and aboveground oil or gasoline storage tanks are installed at compressor stations according to 192.735(b)?*

Assets Covered 88963 (1,877)

Result Notes Materials stored properly and confirmed with FD on access and egress

7. Question Result, ID, References Concern, DC.COCMP.CMPGASDETECT.R, 192.303 (192.736(a), 192.736(b))

Question Text *Do records demonstrate that compressor buildings have a fixed gas detection and alarm system installed according to 192.736?*

Assets Covered 88963 (1,877)

Result Issue Summary Cascade's Compressor Station Operation and Maintenance Form (Form CP# 742) does not clearly indicate at what level gas detectors alarmed. 49 CFR 192.736(b) requires that the gas detection and alarm system must monitor for concentrations of gas in air of not more than 25 percent of the lower explosive limit and warn persons about to enter the building and persons inside the building of the danger. It was verified during the field visit to Fredonia Compressor Station that this is the case but maintenance records are less clear on what concentration was detected and when the system alarmed.

Result Notes Cascade's Compressor Station Operation and Maintenance Form (Form CP# 742) does not clearly indicate at what level gas detectors alarmed. 49 CFR 192.736(b) requires that the gas detection and alarm system must monitor for concentrations of gas in air of not more than 25 percent of the lower explosive limit and warn persons about to enter the building and persons inside the building of the danger. It was

verified during the field visit to Fredonia Compressor Station that this is the case but maintenance records are less clear on what concentration was detected and when the system alarmed.

8. Question Result, ID, References **Sat, DC.COCMP.CMPGASDETECT.O, 192.303 (192.736(a), 192.736(b))**  
Question Text *Do field observations confirm that compressor buildings have a fixed gas detection and alarm system installed according to 192.736?*  
Assets Covered **88963 (1,877)**  
Result Notes **LEL Transmitter 1 (Upper)**

Tested, alarm at 20% LEL, fan turned on at 25% LEL and shutdown at 40%LEL, tested with 2.5% methane

LEL Transmitter 2 (Lower)

Tested, alarm at 20% LEL, fan turned on at 25% LEL and shutdown at 40%LEL, tested with 2.5% methane

Fire eyes East and West tested, both alarmed and shutdown station

All ESDs tested, alarm received, station blow down

## DC.CO: Construction

9. Question Result, ID, References **NA, DC.CO.CASING.O, 192.323 (192.467(a), 192.467(b))**  
Question Text *Do field observations confirm railroad or highway casings are being installed as designed and specified, and in accordance with 192.323?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such activity/condition was observed during the inspection.**
10. Question Result, ID, References **NA, 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 **88963 (1,877)**  
Result Notes **No PE transmission**
11. Question Result, ID, References **NA, DC.CO.PLASTICJOINTINSP.O, 192.287 (192.807(b))**  
Question Text *Do person(s) inspecting joints in plastic pipelines demonstrate they are qualified to evaluate the acceptability of plastic pipe joints?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such activity/condition was observed during the inspection.**
12. Question Result, ID, References **NA, DC.CO.REPAIR.R, 192.303 (192.309)**  
Question Text *Do records demonstrate that repairs to steel pipe are being made in accordance with §192.309?*  
Assets Covered **88963 (1,877)**  
Result Notes **No repairs were made during this inspection period**
13. Question Result, ID, References **NA, DC.CO.REPAIRPLASTIC.R, 192.311**  
Question Text *Do records indicate that imperfections or damage of plastic pipe are repaired or removed?*  
Assets Covered **88963 (1,877)**

## DC.WELDINSP: Construction Weld Inspection

14. Question Result, ID, References **Sat, DC.WELDINSP.WELDVISUALQUAL.R, 192.241 (192.225, 192.227, 192.229, 192.231, 192.233, 192.243, 192.245)**  
Question Text *Does the operator have records showing that the welding was visually and/or non-destructively tested according to the requirements of 192.241 and the operator's specifications or procedures?*  
Assets Covered **88963 (1,877)**  
Result Notes **Reviewed samples of NDT (Xray and Mag Particle) records from 2021, 2022 and 2023**
15. Question Result, ID, References **Sat, DC.WELDINSP.WELDNDT.R, 192.243**  
Question Text *Do records indicate that NDT and interpretation are in accordance with 192.243?*  
Assets Covered **88963 (1,877)**  
Result Notes **Reviewed samples of NDT (Xray and Mag Particle) records from 2021, 2022 and 2023**  
  
**Reviewed NDT procedures from Mistras**
16. Question Result, ID, References **NA, DC.WELDINSP.WELDREPAIR.R, 192.245 (192.303)**  
Question Text *Do records indicate that unacceptable welds are removed and/or repaired in accordance with 192.245?*  
Assets Covered **88963 (1,877)**  
Result Notes

## DC.WELDPROCEDURE: Construction Welding Procedures

17. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELD.R, 192.225**  
Question Text *Does the operator have detailed records showing proper qualification of the welding procedures in accordance with 192.225?*  
Assets Covered **88963 (1,877)**  
Result Notes **Reviewed PQR 3 and PQR 8**
18. Question Result, ID, References **Sat, DC.WELDPROCEDURE.WELDERQUAL.R, 192.227 (192.225, 192.229)**  
Question Text *Do the records demonstrate that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in 192.229?*  
Assets Covered **88963 (1,877)**  
Result Notes **Reviewed Qualifications for Donny Winberg, Rafael Aguilar and Roberto Becerra**  
  
**All were qualified at time of welding being performed**
19. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDERQUAL.O, 192.227 (192.225, 192.229)**  
Question Text *Do field observations confirm that the welders are qualified in accordance with applicable sections of API Standard 1104 or ASME BPVC, Section IX, and cover the limitations in 192.229?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such activity/condition was observed during the inspection.**

## DC.DPCCMP: Design of Compressor Stations

20. Question Result, ID, References **Sat, DC.DPCCMP.CMPBLDGLOCATE.R, 192.163 (192.143, GPTC, NFPA 70, 192.163(e))**  
Question Text *Do the operator's records indicate that the compressor station has been designed and constructed to comply with 192.163?*  
Assets Covered **88963 (1,877)**  
Result Notes **Location of the station is good, not near other structures, verified during field visit**

21. Question Result, ID, References **Sat, DC.DPCCMP.CMPBLDGLOCATE.O, 192.163 (192.143, GPTC, NFPA 70)**  
 Question Text *Do field observations confirm that design and construction of compressor station buildings meet the requirements of 192.163?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Facility is fenced with exits, building constructed of noncombustible materials, compressor building not near other buildings**
22. Question Result, ID, References **Sat, DC.DPCCMP.CMPLIQPROT.O, 192.165 (192.143)**  
 Question Text *Do field observations confirm that compressors are protected from liquids and, as applicable, liquid separators for compressors installed in accordance with 192.165?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **There is liquid removal equipment and storage but field personnel said the storage containers do not fill very fast and they have a company to retrieve liquids as needed**
23. Question Result, ID, References **Sat, DC.DPCCMP.CMPESD.R, 192.167 (192.143)**  
 Question Text *Do the operator's records indicate that compressor station emergency shutdown systems meet the requirements of 192.167?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **ESDs are functional and operate as required**
24. Question Result, ID, References **Sat, DC.DPCCMP.CMPESD.O, 192.167 (192.143)**  
 Question Text *Do field observations confirm that design and construction of compressor station emergency shutdown systems meet the requirements of 192.167?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **4 ESDs located onsite, on building, inside building and in computer room**
25. Question Result, ID, References **Sat, DC.DPCCMP.CMPPRESSLIMIT.R, 192.169 (192.141, 192.143, 192.199)**  
 Question Text *Does the operator have records to indicate that compressor stations have pressure relief or other suitable protective devices in accordance with 192.169?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **OPP tested annually, verified condition of facilities during during field visit**
26. Question Result, ID, References **Sat, DC.DPCCMP.CMPPRESSLIMIT.O, 192.169 (192.141, 192.143, 192.199)**  
 Question Text *Do field observations confirm design and construction of compressor station pressure limiting devices meet the requirements of 192.169?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Relief valves vent outside and will not allow water to enter, reliefs tagged with operating pressure and maintenance date**
27. Question Result, ID, References **Sat, DC.DPCCMP.CMPSAFETYEQIP.R, 192.171 (192.143)**  
 Question Text *Do the operator's records indicate that additional compressor station safety equipment is designed and constructed in accordance with 192.171?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Gas detectors and fire eyes were functional and tested**
28. Question Result, ID, References **NA, DC.DPCCMP.CMPSAFETYEQIP.O, 192.171 (192.141, 192.143)**  
 Question Text *Do field observations confirm that design and construction of additional compressor station safety equipment meet the requirements of 192.171?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No such activity/condition was observed during the inspection.**
29. Question Result, ID, References **Sat, DC.DPCCMP.CMPVENTILATE.R, 192.173 (192.143)**

Question Text *Do operator records indicate that the design and construction of compressor buildings meet the ventilation requirements of 192.173?*

Assets Covered 88963 (1,877)

Result Notes Fan operated when gas detectors read 25% LEL

30. Question Result, ID, References Sat, DC.DPCCMP.CMPVENTILATE.O, 192.173 (192.143)

Question Text *Do field observations confirm that design and construction of compressor buildings meet the ventilation requirements of 192.173?*

Assets Covered 88963 (1,877)

Result Notes Fan was tested during field visit

## DC.DPCOPP: Design of Pipe - Overpressure Protection

31. Question Result, ID, References Sat, DC.DPCOPP.OVERPRESSURE.R, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Do records indicate that the pipeline has pressure relieving or pressure limiting devices that are required by 192.195(a), and that they meet the requirements of 192.199 and 192.201?*

Assets Covered 88963 (1,877)

Result Notes Reviewed design for 017-R-192

32. Question Result, ID, References Sat, DC.DPCOPP.OVERPRESSURE.O, 192.195(a) (192.199(a), 192.199(b), 192.199(c), 192.199(d), 192.199(e), 192.199(f), 192.199(g), 192.199(h), 192.201(a), 192.201(b), 192.201(c))

Question Text *Are required pressure relieving or pressure limiting devices being installed, and do they meet the requirements of 192.199 and 192.201?*

Assets Covered 88963 (1,877)

Result Notes

Sumas Gate

Inlet: 600 psig

4400 Minaker Rd,  
Bellingham

514.6 psig

514.8

Lockup

Mointor: 560 psig as found, began to close monitor, 545 psig, monitor valve opened back up

Lynden Reg Station, R-82, Run 1

54.1 lockup as-found and as left

9005 Jasmine Ln,  
Lynden

53.8 psig outlet,  
514 psig inlet

Run 2

58.2 lockup as-found and as left

Relief 63.4 AF/AL  
R-26

270 psig

Relief

6001 Kickerville Rd,  
Ferndale

261 psig lockup

Setpoint 305 psig

264.2 psig lockup

265 psig

303.6 As Found

305.4 psig as left

R-89, Anacortes

Outlet 257.1  
psig AF/AL

Standby Lockup 265.2 AF/AL

Relief

R-90 Relief,  
Anacortes

Setpoint 320 psig

			318 psig AF/AL
	1st Cut		1st Cut lockup
R-91, Anacortes	390 psig	Outlet	387.6 psig AF/AL
	2nd Cut	368.4 psig	2nd Cut
	370 psig		368.7 psig AF/AL Relief
R-134 Relief, Anacortes			Setpoint 190 psig  188.3 psig AF/AL

33. Question Result, ID, Sat, DC.DPCOPP.PRESSLIMIT.R, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e),  
References 192.199(f), 192.199(g), 192.199(h))

Question Text *Do records indicate that pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 88963 (1,877)

Result Notes Reviewed design for 017-R-192

34. Question Result, ID, Sat, DC.DPCOPP.PRESSLIMIT.O, 192.199(a) (192.199(b), 192.199(c), 192.199(d), 192.199(e),  
References 192.199(f), 192.199(g), 192.199(h))

Question Text *Do field observations confirm pressure relieving or pressure limiting devices meet the requirements of 192.199?*

Assets Covered 88963 (1,877)

Result Notes

			Sumas Gate
			Inlet: 600 psig
4400 Minaker Rd, Bellingham	514.6 psig	514.8	Mointor: 560 psig as found, began to close monitor, 545 psig, monitor valve opened back up
		Lockup	
			Lynden Reg Station, R-82, Run 1
			54.1 lockup as-found and as left
9005 Jasmine Ln, Lynden		53.8 psig outlet, 514 psig inlet	Run 2
			58.2 lockup as-found and as left
			Relief 63.4 AF/AL R-26
	270 psig		Relief
6001 Kickerville Rd, Ferndale		261 psig lockup	Setpoint 305 psig
		264.2 psig lockup	
	265 psig		303.6 As Found
			305.4 psig as left
R-89, Anacortes	Outlet 257.1 psig AF/AL		Standby Lockup 265.2 AF/AL
R-90 Relief, Anacortes			Relief



Setpoint 320 psig

318 psig AF/AL

1st Cut lockup

1st Cut

390 psig

Outlet

387.6 psig AF/AL

R-91, Anacortes

2nd Cut

368.4 psig

2nd Cut

370 psig

368.7 psig AF/AL  
Relief

R-134 Relief,  
Anacortes

Setpoint 190 psig

188.3 psig AF/AL

35. Question Result, ID, References Sat, DC.DPCOPP.PRESSLIMITCAP.R, 192.201(a) (192.201(b), 192.201(c))

Question Text Do records indicate that pressure relief or pressure limiting stations being installed comply with 192.201?

Assets Covered 88963 (1,877)

Result Notes Capacity design for 017-R-192

36. Question Result, ID, References Sat, DC.DPCOPP.PRESSLIMITCAP.O, 192.201(a) (192.201(b), 192.201(c))

Question Text Do field observations verify pressure relief or pressure limiting stations comply with the requirements of 192.201?

Assets Covered 88963 (1,877)

Result Notes

Sumas Gate

4400 Minaker Rd,  
Bellingham

514.6 psig

514.8

Inlet: 600 psig

Lockup

Mointor: 560 psig as found, began to close  
monitor, 545 psig, monitor valve opened back up

Lynden Reg Station, R-82, Run 1

54.1 lockup as-found and as left

9005 Jasmine Ln,  
Lynden

53.8 psig outlet,  
514 psig inlet

Run 2

58.2 lockup as-found and as left

Relief 63.4 AF/AL  
R-26

270 psig

Relief

6001 Kickerville Rd,  
Ferndale

261 psig lockup

Setpoint 305 psig

264.2 psig lockup

265 psig

303.6 As Found

R-89, Anacortes

Outlet 257.1  
psig AF/AL

305.4 psig as left

Standby Lockup 265.2 AF/AL

R-90 Relief,  
Anacortes

Relief

			Setpoint 320 psig
			318 psig AF/AL
	1st Cut		1st Cut lockup
R-91, Anacortes	390 psig	Outlet	387.6 psig AF/AL
	2nd Cut	368.4 psig	2nd Cut
	370 psig		368.7 psig AF/AL
			Relief
R-134 Relief, Anacortes			Setpoint 190 psig
			188.3 psig AF/AL

37. Question Result, ID, References **NA, DC.DPCOPP.MULTISTAGE.R,**  
 Question Text *Do records indicate that the operator is installing multistage regulator equipment consistent with the requirements in WAC 480-93-130?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No multistage pressure regulation on the transmission system**

### DC.DPC: Design of Pipe Components

38. Question Result, ID, References **Sat, DC.DPC.ILIPASS.R, 192.150 (192.150(a), 192.150(c))**  
 Question Text *Do records indicate that certain transmission pipeline components are designed and constructed to accommodate the passage of instrumented internal inspection devices?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Reviewed as-builts for 2023 March Pt replacement of ~18' of pipe**
39. Question Result, ID, References **Sat, DC.DPC.VALVESPACE.R, 192.179(a) (192.179(a)(1), 192.179(a)(2), 192.179(a)(3), 192.179(a)(4), 192.179(b), 192.179(c), 192.179(d))**  
 Question Text *Do records indicate that transmission line valve spacing is in accordance with 192.179(a)?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Reviewed CNGs GIS to see valve spacing, all valves were no more than 8 miles apart**
40. Question Result, ID, References **NA, DC.DPC.VALVESPACE.O, 192.141 (192.179(a), 192.179(b), 192.179(c), 192.179(d))**  
 Question Text *Are transmission line valves being installed as required by 192.179?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No such activity/condition was observed during the inspection.**
41. Question Result, ID, References **NA, DC.DPC.INTCORRODE.R, 192.476(d) (192.476(b), 192.476(c), 192.476(a))**  
 Question Text *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No internal corrosion has been identified in their system**
42. Question Result, ID, References **NA, DC.DPC.INTCORRODE.O, 192.476(a) (192.476(b), 192.476(c))**  
 Question Text *Does the transmission project's design and construction comply with 192.476?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No such activity/condition was observed during the inspection.**
43. Question Result, ID, References **Sat, DC.DPC.CCROTCOATLOWER.R, 192.143(b) (192.461(c)) (also presented in: DC.CO)**

Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*

Assets Covered 88963 (1,877)

Result Notes Reviewed construction jobs from 2021, 2022 and 2023. All jobs indicated that pipeline was jeeped and holidays were re-wrapped

44. Question Result, ID, References Sat, DC.DPC.CCELECTRICALISOL.R, 192.467(c) (192.143(b))

Question Text *Do operator's records indicate that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*

Assets Covered 88963 (1,877)

Result Notes Reviewed inspection dates, all casing inspected annually NTE 15 months

Reviewed records for 2020-2023

45. Question Result, ID, References Sat, DC.DPC.CCELECTRICALISOL.O, 192.467(c) (192.143(b))

Question Text *Do field observations confirm that each pipeline was electrically isolated from metallic casings that are a part of the underground system?*

Assets Covered 88963 (1,877)

Result Notes	9056 N Telegraph Rd, Sumas	-1587 mV ON, -1053 mV OFF	-440 mV ON, -420 mV OFF	Casing
	3911 Morgan Rd, Sumas	-1948 mV ON, -1098 mV OFF	-594 mV ON, -589 mV OFF	Casing
	Guide Meridian Rd, Lynden	-1853 mV ON, -1169 mV OFF	-537 mV ON, -537 mV OFF	Casing, CA-1117571
	I-5 Casing	-1390 mV ON, -1080 mV OFF	-711 mV ON/OFF	Casing, CA-1116211
	SR9 & Lucas Dr, Sedro Wooley	-1322 mV ON, -905 mV OFF	-563 mV ON/OFF	CA-1117090
	I-5 & Maiben Rd Casing, Burlington	-1260 mV ON, -933 mV OFF	-522 mV ON/OFF	CA-1116943
	S March Point Rd, Anacortes	-1306 mV ON, -1021 mV OFF	-558 mV ON/OFF	CA-1116927
	17281 Peterson Rd, Burlington	-1396 mV ON, -1059 mV OFF	-600 mV ON/OFF	47117-001-CA-0036
	CA-1117473, Bremerton	-1508 mV ON, -1026 mV OFF	-236 mV	Casing

## DC.MO: Maintenance and Operations

46. Question Result, ID, References Sat, DC.MO.ICEXAMINE.R, 192.491(c) (192.475(a), 192.475(b), 192.475(c))

Question Text *Do records indicate examination of removed pipe for evidence of internal corrosion?*

Assets Covered 88963 (1,877)

Result Notes Distribution Line Report (Form 336) completed indicates Internal Pipe Condition. All reviewed checked the box for "Good"

Reviewed records from 2021-2023

47. Question Result, ID, References NA, DC.MO.ICEXAMINE.O, 192.475(a) (192.475(b), 192.475(c))

Question Text *Is examination of removed pipe conducted to determine any evidence of internal corrosion?*

Assets Covered 88963 (1,877)

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

48. Question Result, ID, References Sat, DC.MO.MAOPLIMIT.O, 192.605(b)(5)

Question Text *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?*

Assets Covered 88963 (1,877)

Result Notes Valves were closed at reg stations in accordance with procedure, field personnel monitored pressure during valve operation

49. Question Result, ID, References Sat, DC.MO.RECORDUPDATE.R,

Question Text *Do records indicate that records, maps, and drawings of gas facilities are updated not later than six months from completion of construction activity and made available to appropriate personnel?*

Assets Covered 88963 (1,877)

Result Notes Reviewed a sample of jobs completed in 2020 and 2021 and a screenshot of updated maps with revision dates

Reviewed construction job from 2023 (Anacortes W/O 291251, installed 2/21/23)

2" to reg station updated July 2023, 16" updated July 2023

## DC.PT: Pressure Testing

50. Question Result, ID, Sat, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented References in: DC.PTLOWPRESS)

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*

Assets Covered 88963 (1,877)

Result Notes Reviewed jobs from 2021-2023, all data complete and in accordance with 192.503

No pressure tests occurred in 2020

51. Question Result, ID, NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented References in: DC.PTLOWPRESS)

Question Text *Is pressure testing conducted in accordance with 192.503?*

Assets Covered 88963 (1,877)

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

52. Question Result, ID, NA, DC.PT.PRESSTESTHIGHSTRESS.R, 192.505(a) (192.143(a), 192.517(a), 192.505(b), 192.505(c), 192.505(d), 192.143(b), 192.143(c))

Question Text *Do records indicate that the sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS were strength tested in accordance with the requirements of 192.505?*

Assets Covered 88963 (1,877)

Result Notes No sections of pipe with MAOP greater than 30% SMYS were tested during this period

53. Question Result, ID, NA, DC.PT.PRESSTESTHIGHSTRESS.O, 192.505(a) (192.143(a), 192.505(b), 192.505(c), 192.505(d), 192.143(b), 192.143(c))

Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress equal to or greater than 30% of SMYS are strength tested in accordance with the requirements of 192.505?*

Assets Covered 88963 (1,877)

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

54. Question Result, ID, NA, DC.PT.PRESSTESTPLASTIC.R, 192.513(a) (192.143(a), 192.517(b), 192.513(c), 192.513(d), 192.143(b), 192.143(c))

Question Text *Do records indicate that the sections of a plastic pipeline were tested in accordance with the requirements of 192.513?*

Assets Covered 88963 (1,877)

Result Notes No PE transmission in CNGC system

55. Question Result, ID, NA, DC.PT.PRESSTESTPLASTIC.O, 192.513(a) (192.143(a), 192.513(b), 192.513(c), 192.513(d), 192.143(b), 192.143(c))

Question Text *Do field observations confirm that sections of a plastic pipeline are tested in accordance with the requirements of 192.513?*

Assets Covered 88963 (1,877)

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

56. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.SPT, DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*

Assets Covered 88963 (1,877)

Result Notes OPS 505 Section 10

57. Question Result, ID, **NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.SPT, References **DC.PTLOWPRESS**)  
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No such activity/condition was observed during the inspection.**
58. Question Result, ID, **Sat, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.SPT, References **DC.PTLOWPRESS**)  
 Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **OPS 505 Section 10**
59. Question Result, ID, **NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.SPT, References **DC.PTLOWPRESS**)  
 Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No such activity/condition was observed during the inspection.**
60. Question Result, ID, **Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b))** (also presented in: DC.SPT, References **DC.PTLOWPRESS**)  
 Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **W Cowlitz Way in Longview, no pressure test records, CNG Engineer confirmed this line is part of MAOP validation settlement**  
  
**WO 18794 in Lynden, no pressure test record, CNG Engineer confirmed this line is part of MAOP validation settlement**  
  
**Fredonia Line pressure tested 7/28/83, 750 psig, 24 hours**  
  
**Reviewed pressure test from 1963 in Shelton**
61. Question Result, ID, **Sat, DC.PT.EQUIPMENTCALIBRATION.R,** References  
 Question Text *Do records indicate that pressure testing equipment is maintained and calibrated at appropriate intervals in accordance with the manufacturer’s recommendations?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Reviewed equipment calibration records for all jobs in 2021-2023, calibration good**

**DC.PTLOWPRESS: Pressure Testing - Low Pressure**

62. Question Result, ID, **Sat, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.507 (192.505, 192.515, 192.517, ANSI/GPTC Z380.1-2018 Appendix G-192-9)** References  
 Question Text *Do records indicate that, as applicable to the project, sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig were tested in accordance with the requirements of 192.507?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Reviewed jobs from 2021-2023, all data complete and in accordance with 192.503**  
  
**No pressure tests occurred in 2020**
63. Question Result, ID, **NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.O, 192.507 (192.505, 192.515, ANSI/GPTC Z380.1-2018 Appendix G-192-9)** References  
 Question Text *Do field observations confirm that sections of a pipeline operating at a hoop stress less than 30% of SMYS and at or above 100 psig are tested in accordance with the requirements of 192.507?*  
 Assets Covered **88963 (1,877)**

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

64. Question Result, ID, References NA, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.509 (192.143, 192.517)

Question Text Do records indicate that the sections of a pipeline operated below 100 psig were leak tested in accordance with the section requirements of 192.509 (except for service lines and plastic pipelines)?

Assets Covered 88963 (1,877)

Result Notes No low pressure transmission

65. Question Result, ID, References NA, DC.PTLOWPRESS.PRESSTEST100PSIG.O, 192.509 (192.143)

Question Text Do field observations confirm that sections of a pipeline operated below 100 psig are leak tested in accordance with the requirements of 192.509 (except for service lines and plastic pipelines)?

Assets Covered 88963 (1,877)

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

## DC.TQ: Training and Qualification

66. Question Result, ID, References Sat, DC.TQ.ABNORMAL.R, 192.807(a) (192.803)

Question Text Do records show evaluation of qualified individuals for recognition and reaction to AOCs?

Assets Covered 88963 (1,877)

Result Notes Reviewed OQs for Service Mechanics, Welders, etc. All qualified for AOC task and individual tasks have AOCs identified

67. Question Result, ID, References Sat, DC.TQ.RECORDS.R, 192.807(a) (Operators OQ program manual)

Question Text Are qualification records maintained for operator personnel?

Assets Covered 88963 (1,877)

Result Notes Joel Lea

Odorization: Periodic Sampling due 9/6/24

Scott Stalcup

Valve Maint due 4/7/24

## EP.ERG: Emergency Response

68. Question Result, ID, References Sat, EP.ERG.REVIEW.R, 192.605(a)

Question Text Have annual reviews been conducted of the emergency plans and procedures as required, and any updates completed as appropriate?

Assets Covered 88963 (1,877)

Result Notes Reviewed records for 2020-2023

Retired OPS 925 on 3/1/21 and adopted OPS 613 on 3/1/21

69. Question Result, ID, References Sat, EP.ERG.LOCATION.O, 192.615(b)(1)

Question Text Are supervisors provided the applicable portions of the emergency plan and procedures?

Assets Covered 88963 (1,877)

Result Notes All employees have access to records, procedures and maps via laptop and phone

70. Question Result, ID, References NA, EP.ERG.POSTEVNTREVIEW.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 88963 (1,877)

Result Notes No emergencies occurred during this inspection period

71. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4),  
References 192.616(c), ADB-05-03) (also presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered 88963 (1,877)

Result Notes Reviewed PA mailers to public officials and emergency responders, reviewed records for 2020-2022

## FS.CSSYSROT: Compressor Station System Protection

72. Question Result, ID, Sat, FS.CSSYSROT.CMPFP.O, 192.171(a)  
References

Question Text *Do compressor stations have adequate fire protection facilities?*

Assets Covered 88963 (1,877)

Result Notes LEL Transmitter 1 (Upper)

Tested, alarm at 20% LEL, fan turned on at 25% LEL and shutdown at 40%LEL, tested with 2.5% methane

LEL Transmitter 2 (Lower)

Tested, alarm at 20% LEL, fan turned on at 25% LEL and shutdown at 40%LEL, tested with 2.5% methane

Fire eyes East and West tested, both alarmed and shutdown station

All ESDs tested, alarm received, station blow down

Fire extinguishers on site

73. Question Result, ID, Sat, FS.CSSYSROT.CMPGASDET.O, 192.736(a) (192.736(b))  
References

Question Text *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?*

Assets Covered 88963 (1,877)

Result Notes LEL Transmitter 1 (Upper)

Tested, alarm at 20% LEL, fan turned on at 25% LEL and shutdown at 40%LEL, tested with 2.5% methane

LEL Transmitter 2 (Lower)

Tested, alarm at 20% LEL, fan turned on at 25% LEL and shutdown at 40%LEL, tested with 2.5% methane

Fire eyes East and West tested, both alarmed and shutdown station



All ESDs tested, alarm received, station blow down

74. Question Result, ID, References **NA, FS.CSSYSROT.CMPGASENGMFL.O, 192.171(e)**  
Question Text *Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such activity/condition was observed during the inspection.**
75. Question Result, ID, References **NA, FS.CSSYSROT.CMPGASENGSD.O, 192.171(d)**  
Question Text *Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such activity/condition was observed during the inspection.**
76. Question Result, ID, References **Sat, FS.CSSYSROT.CMPLUBROT.O, 192.171(c)**  
Question Text *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication?*  
Assets Covered **88963 (1,877)**  
Result Notes **Display screen indicates that oil temperature and engine speed are monitored**
77. Question Result, ID, References **Sat, FS.CSSYSROT.CMPOVSPD.O, 192.171(b)**  
Question Text *Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven?*  
Assets Covered **88963 (1,877)**  
Result Notes **Display screen indicates that oil temperature and engine speed are monitored**
78. Question Result, ID, References **Sat, FS.CSSYSROT.CMPRELIEF.O, 192.199 (192.731(a), 192.731(b), 192.731(c))**  
Question Text *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly?*  
Assets Covered **88963 (1,877)**  
Result Notes **Reliefs tagged with calibration date**
79. Question Result, ID, References **NA, FS.CSSYSROT.ESDDISTSD.O, 192.167(b)**  
Question Text *Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
80. Question Result, ID, References **Sat, FS.CSSYSROT.ESDELECSO.O, 192.167(a)(3)(i) (192.167(a)(3)(ii))**  
Question Text *Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings?*  
Assets Covered **88963 (1,877)**
81. Question Result, ID, References **Sat, FS.CSSYSROT.ESDGASBLK.O, 192.167(a)(1)**  
Question Text *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less.*  
Assets Covered **88963 (1,877)**



Result Notes Gas Detectors, Fire Eyes and ESDs tested while onsite

All would blow down the station when operating

82. Question Result, ID, References Sat, FS.CSSYSROT.ESDGASDISCH.O, 192.167(a)(2)  
Question Text Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?  
Assets Covered 88963 (1,877)  
Result Notes Gas discharged outside
83. Question Result, ID, References Sat, FS.CSSYSROT.ESDGASSD.O, 192.167(a)(3)  
Question Text Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings?  
Assets Covered 88963 (1,877)  
Result Notes ESD in building and outside
84. Question Result, ID, References Sat, FS.CSSYSROT.ESDLOCATION.O, 192.167(a)(4)  
Question Text Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station?  
Assets Covered 88963 (1,877)  
Result Notes ESD in building and outside
85. Question Result, ID, References NA, FS.CSSYSROT.UNATTPLATCMPSD.O, 192.167(c)(1)  
Question Text Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform.  
Assets Covered 88963 (1,877)  
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
86. Question Result, ID, References Sat, FS.CSSYSROT.CMPRELIEF.R, 192.709(b) (192.709(c), 192.731(a), 192.731(b), 192.731(c))  
Question Text Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval?  
Assets Covered 88963 (1,877)  
Result Notes Relief valves are sent to Bay Valve for maintenance and calibration annually  
  
Records documented on Compressor Station O&M Form (CP#742)
87. Question Result, ID, References Sat, FS.CSSYSROT.CMPESDTESTDEV.R, 192.709(c) (192.731(c))  
Question Text Do records document the inspection and testing of all compressor station emergency shutdown devices at the required frequency?  
Assets Covered 88963 (1,877)  
Result Notes Reviewed all compressor station inspection for 2020, 2021, 2022 and 2023
88. Question Result, ID, References Unsat, FS.CSSYSROT.CMPGASDETOM.R, 192.709(c) (192.736(c))  
Question Text Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required?  
Assets Covered 88963 (1,877)  
Result Issue Summary Cascade did not complete maintenance and performance testing of the gas detection and alarm system at Fredonia Compressor Station as required by 49 CFR 192.736(c) and their internal procedures. Compressor Station Operation and Maintenance Procedure (CP# 742) specifies that LEL detectors will be tested 4 times each calendar year and Infrared Detectors (Fire Eyes) will be tested twice each calendar

year. Based on maintenance records provided by Cascade (Form CP#742), LEL detectors were only tested 3 times in 2021 and 2022 and Fire Eyes were only tested once in 2022.

Standard Issues B2 (Moderate or small impact/limited occurrence) : 192.736(c) : Records indicate requirement not completed at required intervals.

Result Notes Cascade did not complete maintenance and performance testing of the gas detection and alarm system at Fredonia Compressor Station as required by 49 CFR 192.736(c) and their internal procedures. Compressor Station Operation and Maintenance Procedure (CP# 742) specifies that LEL detectors will be tested 4 times each calendar year and Infrared Detectors (Fire Eyes) will be tested twice each calendar year. Based on maintenance records provided by Cascade (Form CP#742), LEL detectors were only tested 3 times in 2021 and 2022 and Fire Eyes were only tested once in 2022.

## FS.CS: Compressor Stations

89. Question Result, ID, References Sat, FS.CS.BLDGEXITS.O, 192.163(c)

Question Text *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?*

Assets Covered 88963 (1,877)

Result Notes Compressor building has two doors that swing outward and are unobstructed

90. Question Result, ID, References Sat, FS.CS.CMPNFPA70.O, 192.163(e)

Question Text *Does the equipment and wiring within compressor stations conform to National Electric Code, ANSI/NFPA 70, including the required posting or ready access of the permit?*

Assets Covered 88963 (1,877)

91. Question Result, ID, References Sat, FS.CS.FENCEGATES.O, 192.163(d)

Question Text *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?*

Assets Covered 88963 (1,877)

Result Notes Two gates that open outward, gates are kept open while personnel are on site

92. Question Result, ID, References Sat, FS.CS.CMPBLDGVENT.O, 192.173

Question Text *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas?*

Assets Covered 88963 (1,877)

Result Notes Building is ventilated and fan turns on at 25% LEL

93. Question Result, ID, References Sat, FS.CS.CMPERP.O, 192.605(a) (192.615(b))

Question Text *Are emergency response plans for selected compressor stations kept on site?*

Assets Covered 88963 (1,877)

Result Notes Emergency Response Plan located in computer room near compressor building

## FS.VA: Valves

94. Question Result, ID, References Sat, FS.VA.CMPVLVTEST.R, 192.709(c) (192.745(a), 192.745(b))

Question Text *Do records adequately document that compressor transmission line valves have been inspected and partially operated at the correct interval?*

Assets Covered 88963 (1,877)

Result Notes Reviewed valve records, no AOCs identified, reviewed records for 2020-2023

95. Question Result, ID, References Sat, FS.VA.CMPVLVMAINT.O, 192.745(a) (192.745(b))

Question Text *Are transmission line valves maintained as required?*

Assets Covered 88963 (1,877)

Result Notes	V32929, Sumas	Above ground, marker good, operated freely, indicator moved, valve returned to start
	V32933, Sumas	Above ground, marker good, operated freely, indicator moved, valve returned to start
	V36574, Sedro Woolley	Below ground valve, ¼ turn, valve operated freely
	V32932, Sedro Woolley	Above ground, valve difficult to operate, valve greased
	V32923, Burlington	Above ground, operated with wheel, operated freely, marker in good condition
	V32921, Bremerton	Above ground, operated with wheel, operated freely, marker in good condition
	V32906, Shelton	Above ground, operated with wheel, operated freely, marker in good condition, small leak on top, technician created WO and CNG provided documentation

## MO.GC: Conversion to Service

96. Question Result, ID, References **NA, MO.GC.CONVERSION.R, 192.14(a) (192.14(b), 192.14(c))**  
 Question Text *Do records indicate the process was followed for converting any pipelines into Part 192 service?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## MO.GOABNORMAL: Gas Pipeline Abnormal Operations

97. Question Result, ID, References **NA, MO.GOABNORMAL.ABNORMAL.R, 192.605(a) (192.605(c)(1))**  
 Question Text *Did personnel respond to indications of abnormal operations as required by the process?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Not applicable to distribution operators**
98. 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 **88963 (1,877)**  
 Result Notes **Not applicable to distribution operators**

## MO.GOCLASS: Gas Pipeline Class Location

99. Question Result, ID, References **Sat, 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 **88963 (1,877)**  
 Result Notes **Reviewed GIS layers for class locations, survey completed every 3 years, some areas moved to a higher class location in 2022**

## MO.GOMAOP: Gas Pipeline MAOP

100. Question Result, ID, References **Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.709(c) (192.619(a), 192.619(b), 192.619(f), 192.517)**  
 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 **88963 (1,877)**  
 Result Notes **Engineering presented an MAOP spreadsheet which shows calculations, hi-5, etc. to show how MAOP was determined for each pipeline in accordance with 192.619**

## MO.GM: Gas Pipeline Maintenance

101. Question Result, ID, References **Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))** (also presented in: MO.GMOPP)  
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 **88963 (1,877)**  
Result Notes **All records of repairs, patrols, surveys, etc. were readily available**
102. 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 **88963 (1,877)**  
Result Notes **Reviewed JSAs to verify procedures for prevention of accidental ignition**
103. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.R, 192.709(c) (192.745(a), 192.745(b))**  
Question Text *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?*  
Assets Covered **88963 (1,877)**  
Result Notes **Reviewed valve maintenance records for 2020-2023**  
  
**Checked that follow up was completed for deficiencies found**
104. Question Result, ID, References **Sat, MO.GM.VALVEINSPECT.O, 192.745(a) (192.745(b))**  
Question Text *Are field inspection and partial operation of transmission line valves adequate?*  
Assets Covered **88963 (1,877)**  
Result Notes **V32929, Sumas Above ground, marker good, operated freely, indicator moved, valve returned to start**  
**V32933, Sumas Above ground, marker good, operated freely, indicator moved, valve returned to start**  
**V36574, Sedro Woolley Below ground valve, ¼ turn, valve operated freely**  
**V32932, Sedro Woolley Above ground, valve difficult to operate, valve greased**  
**V32923, Burlington Above ground, operated with wheel, operated freely, marker in good condition**  
**V32921, Bremerton Above ground, operated with wheel, operated freely, marker in good condition**  
**V32906, Shelton Above ground, operated with wheel, operated freely, marker in good condition, small leak on top, technician created WO and CNG provided documentation**
105. Question Result, ID, References **NA, MO.GM.EQUIPPLASTICJOINT.R, 192.603(b) (192.756)**  
Question Text *Do records indicate equipment used in joining plastic pipe was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*  
Assets Covered **88963 (1,877)**  
Result Notes **No PE transmission in their system**
106. Question Result, ID, References **NA, MO.GM.EQUIPPLASTICJOINT.O, 192.756**  
Question Text *Is proper maintenance being performed on equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?*  
Assets Covered **88963 (1,877)**  
Result Notes **No plastic transmission**

## MO.GOODOR: Gas Pipeline Odorization

107. Question Result, ID, **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 **88963 (1,877)**  
 Result Notes **Reviewed records for 2020-2023, completed monthly**
108. Question Result, ID, **Sat, MO.GOODOR.ODORIZE.O, 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 **88963 (1,877)**  
 Result Notes
- |   |                                     |
|---|-------------------------------------|
|   | <b>55 Rotameter reading</b>         |
|   | <b>0.3% gas-in-air</b>              |
| <b>6003 Kickerville Rd, Ferndale</b>    | <b>Glass Float</b>                  |
|   | <b>Unit calibration due 1-12-24</b> |
|   | <b>0.79% gas-in-air</b>             |
| <b>11310 Whistle Lake Rd, Anacortes</b> | <b>Unit Calibration due 1/18/24</b> |
|   | <b>First Detection</b>              |
|   | <b>40 Rotameter reading</b>         |
|   | <b>0.18% gas-in-air</b>             |
|   | <b>Readily Detectable</b>           |
| <b>92 Olding Rd, Bremerton</b>          | <b>70 Rotameter reading</b>         |
|   | <b>0.38% gas-in-air</b>             |
|   | <b>Glass Float</b>                  |
|   | <b>Unit calibration due 11-9-23</b> |

## MO.GO: Gas Pipeline Operations

109. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also References **presented in: MO.GOCLASS**)  
 Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **One location identified at culvert crossing due to risk of washout, culvert replaced in 2022 so no longer identified as needing continuing surveillance**  
**Reviewed records for 2020-2022**
110. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also References **presented in: MO.GOCLASS**)  
 Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*  
 Assets Covered **88963 (1,877)**

Result Notes ROW conditions were adequate

111. 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 88963 (1,877)  
Result Notes Procedures reviewed annually NTE 15 months
112. 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 88963 (1,877)  
Result Notes QMS and supervisors review all records completed
113. 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 88963 (1,877)  
Result Notes Personnel have access to maps, records, GIS, etc. via sharepoint, laptops, etc.
114. Question Result, ID, References Sat, MO.GO.OMHISTORY.O, 192.605(b)(3)  
Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*  
Assets Covered 88963 (1,877)  
Result Notes All records and maps are available on computers and phones
115. Question Result, ID, References Sat, MO.GO.OMLOCATION.O, 192.605(a)  
Question Text *Are appropriate parts of the manual kept at locations where operations and maintenance activities are conducted?*  
Assets Covered 88963 (1,877)  
Result Notes All records and maps are available on computers and phones
116. Question Result, ID, References NA, MO.GO.UPRATE.R, 192.553(b) (192.553(a), 192.553(c), 192.553(d))  
Question Text *Do records indicate the pressure uprating process was implemented per the requirements of 192.553?*  
Assets Covered 88963 (1,877)  
Result Notes No uprates occurred during this inspection period

## MO.GMOPP: Gas Pipeline Overpressure Protection

117. 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?*  
Assets Covered 88963 (1,877)  
Result Notes Reviewed records for 2020, 2021 and 2022  
  
R-134 showed reg capacity higher than relief, contacted engineering to determine acceptability, they said it is a worker-monitor with a token relief
118. 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?*  
Assets Covered 88963 (1,877)  
Result Notes Reviewed records for pressure limiting, relief devices, and pressure regulating stations for 2021-2023

119. Question Result, ID, References Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b), 192.743)

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

Assets Covered 88963 (1,877)

Result Notes

			Sumas Gate
		514.8	Inlet: 600 psig
4400 Minaker Rd, Bellingham	514.6 psig	Lockup	Mointor: 560 psig as found, began to close monitor, 545 psig, monitor valve opened back up
			Lynden Reg Station, R-82, Run 1
			54.1 lockup as-found and as left
9005 Jasmine Ln, Lynden		53.8 psig outlet, 514 psig inlet	Run 2
			58.2 lockup as-found and as left
			Relief 63.4 AF/AL R-26
	270 psig		Relief
6001 Kickerville Rd, Ferndale		261 psig lockup	Setpoint 305 psig
		264.2 psig lockup	303.6 As Found
	265 psig		305.4 psig as left
R-89, Anacortes	Outlet 257.1 psig AF/AL		Standby Lockup 265.2 AF/AL
			Relief
R-90 Relief, Anacortes			Setpoint 320 psig
			318 psig AF/AL
	1st Cut		1st Cut lockup
	390 psig	Outlet	387.6 psig AF/AL
R-91, Anacortes			
	2nd Cut	368.4 psig	2nd Cut
	370 psig		368.7 psig AF/AL
			Relief
R-134 Relief, Anacortes			Setpoint 190 psig
			188.3 psig AF/AL

## MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

120. Question Result, ID, References Unsat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c)) (also presented in: PD.RW)

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

Assets Covered 88963 (1,877)



**Result Issue Summary** Based on patrolling records provided by Cascade, there were several missed patrols including quarterly, semiannual and annual patrols as required by 49 CFR 192.705. There were at least three locations with records missing for quarterly patrols, nine locations with records missing for semiannual patrols, and three locations with records missing for annual patrols. These included locations in Anacortes, Mount Vernon, Belfair and Shelton. The missing records were for years 2020, 2021 and 2022.

**Standard Issues** B1 (Moderate or small impact/widespread occurrence) : 192.705(b) : No record/documentation.

**Result Notes** Quarterly, Semiannual and Annual missing some patrolling

Reviewed records for 2020-2023

121. Question Result, ID, **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: References **PD.RW)**

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

**Assets Covered** 88963 (1,877)

**Result Notes** Markers were in good condition and placed where required

122. Question Result, ID, **Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c))** (also presented in: PD.RW) References

**Question Text** *Are the ROW conditions acceptable for the type of patrolling used?*

**Assets Covered** 88963 (1,877)

**Result Notes** ROW is in good condition and is adequate for walking/driving patrol

123. Question Result, ID, **Sat, MO.RW.MARKERSURVEY.R,** References

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

**Assets Covered** 88963 (1,877)

**Result Notes** Marker surveys completed as part of leak survey

Reviewed all records for 2020-2023

124. Question Result, ID, **Concern, MO.RW.LEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b), 192.935(d))** References

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

**Assets Covered** 88963 (1,877)

**Result Issue Summary** All leak survey records were available but the record keeping process and presentation of records made for an inefficient inspection at times. Staff and Cascade had to meet on at least three separate occasions in order to fully complete the records review. Staff recommend Cascade seek opportunities to improve the recordkeeping process and/or system for leak survey records in order to ensure an efficient and thorough records review can be completed

**Result Notes** Reviewed leak survey records on CNGs GIS and paper records from 2020-2023. All records were available

The record keeping process and presentation of leak survey records made for an inefficient inspection at times. Although Cascade was able to present all required records, it was very difficult to view the records and ensure that compliance with regulations had been achieved

125. Question Result, ID, **Sat, MO.RW.CASINGLEAKSURVEY.R,** References

**Question Text** *Do records indicate shorted casings were leak surveyed as required?*

**Assets Covered** 88963 (1,877)

**Result Notes** Casing leak surveys included in annual CP casing records, completed twice annually

126. Question Result, ID, **Sat, MO.RW.SPECIALLEAKSURVEY.R,** References

**Question Text** *Do records indicate that special leak surveys have been conducted as required by WAC 480-93-188?*

**Assets Covered** 88963 (1,877)

**Result Notes** Special leak survey and follow-up survey conducted due to ground fault in Mt Vernon district, 4/8/21 and 5/4/21

127. Question Result, ID, **NA, MO.RW.LEAKGRADE.R,** References



Question Text *Do records indicate that the operator has graded leaks and determined the extent of each leak?*

Assets Covered 88963 (1,877)

Result Notes No leaks on the transmission system during this inspection period

128. Question Result, ID, References NA, MO.RW.LEAKFOLLOWUP.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 88963 (1,877)

Result Notes No leaks on the transmission system during this inspection period

129. 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 88963 (1,877)

Result Notes No leaks on the transmission system during this inspection period

130. Question Result, ID, References NA, MO.RW.LEAKREPAIRTIME.R,

Question Text *Do records indicate that leaks were repaired and re-evaluated within the timeframes specified in WAC 480-93-18601?*

Assets Covered 88963 (1,877)

Result Notes No leaks on the transmission system during this inspection period

131. Question Result, ID, References NA, MO.RW.LEAKRECORDS.R,

Question Text *Have gas leak records been prepared and maintained as required?*

Assets Covered 88963 (1,877)

Result Notes No leaks on the transmission system during this inspection period

132. Question Result, ID, References Sat, MO.RW.LEAKCALIBRATE.R,

Question Text *Do records indicate that gas detection equipment has been maintained and calibrated in accordance with the manufacturer's recommendations?*

Assets Covered 88963 (1,877)

Result Notes Reviewed a sample of equipment calibration records, units self calibrate daily, records indicate that unit calibrated before survey

## PD.DP: Damage Prevention

133. Question Result, ID, References NA, PD.DP.ONECALL.O, 192.614(c)(3)

Question Text *Observe operator process a "One Call" ticket.*

Assets Covered 88963 (1,877)

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

134. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c)

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

Assets Covered 88963 (1,877)

Result Notes OPS 614 Damage Prevention Program

135. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))

Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*

Assets Covered 88963 (1,877)

Result Notes Patrolling records include inspection for encroachment info, 3rd party activity

Reviewed CNG 625/UG Form21722 for Integrity digs

136. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.R,**  
Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*  
Assets Covered **88963 (1,877)**  
Result Notes **No transmission line have been damaged during this inspection interval**

137. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**  
Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*  
Assets Covered **88963 (1,877)**  
Result Notes

## **PD.PA: Public Awareness**

138. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)**  
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 **88963 (1,877)**  
Result Notes **PA materials produced in english and spanish**

## **PD.SP: Special Permits**

139. Question Result, ID, References **NA, PD.SP.REPAIR.R, 190.341(d)(2)**  
Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

## **RPT.NR: Notices and Reporting**

140. Question Result, ID, References **Sat, RPT.NR.CONTACTUPDATE.R,**  
Question Text *Do records indicate that the operator submits updated name, address, and phone numbers of emergency contacts/responsible officials to the commission and appropriate officials of ALL municipalities in which the company has pipeline facilities?*  
Assets Covered **88963 (1,877)**  
Result Notes **Last update was in 2018, records sent to UTC**

141. Question Result, ID, References **NA, RPT.NR.CONSTRUCTIONREPORT.R,**  
Question Text *Do records indicate the operator has filed a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length?*  
Assets Covered **88963 (1,877)**  
Result Notes **No construction or replacement greater than 100 feet**

142. Question Result, ID, References **Sat, RPT.NR.PRESSURETESTNOTIFY.R,**  
Question Text *Do records indicate that the operator notified the commission 3 days prior to commencement of any pressure test of a gas pipeline that will have a MAOP that produces a hoop stress of twenty percent or more of the specified minimum yield strength?*  
Assets Covered **88963 (1,877)**  
Result Notes **12 notices sent to commission as part of MAOP Validation settlement**

143. Question Result, ID, References **NA, RPT.NR.PROXIMITYREQUEST.R,**

Question Text *Do records demonstrate that the operator is in compliance with the proximity consideration requirements in WAC 480-93-020?*

Assets Covered 88963 (1,877)

Result Notes No proximity requests on the transmission system during this inspection period

## RPT.RR: Regulatory Reporting (Traditional)

144. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 191.17(a)

Question Text *Have complete and accurate Annual Reports utilizing the most recent form F 7 100.2-1 been submitted?*

Assets Covered 88963 (1,877)

Result Notes Reviewed reports for 2020-2022, all completed by March 15

145. Question Result, ID, References Sat, RPT.RR.CONSTRUCTIONDEFECTS.R,

Question Text *Do records indicate that the operator has submitted timely and complete reports of construction defects and material failures that resulted in leaks?*

Assets Covered 88963 (1,877)

Result Notes Reviewed reports for 2020-2022, all completed by March 15

146. Question Result, ID, References NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a))

Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*

Assets Covered 88963 (1,877)

Result Notes No reportable incidents during this inspection period

147. Question Result, ID, References NA, RPT.RR.INCIDENTREPORT.R, 191.15(a) (192.624(a)(1), 192.624(a)(2))

Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on the most recent Form within the required timeframe?*

Assets Covered 88963 (1,877)

Result Notes No reportable incidents during this inspection period

148. Question Result, ID, References NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.15(d)

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

Assets Covered 88963 (1,877)

Result Notes No reportable incidents during this inspection period

149. Question Result, ID, References NA, RPT.RR.FAILUREANALYSIS.R,

Question Text *Do records indicate that the operator submits failure analysis reports within 5 days of completion for incidents or hazardous conditions due to construction defects or material failures?*

Assets Covered 88963 (1,877)

Result Notes No failures during this inspection period

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

Question Text *Do records indicate Safety-Related Condition Reports were filed as required?*

Assets Covered 88963 (1,877)

Result Notes No SRCs during this inspection period

151. Question Result, ID, References Sat, RPT.RR.NPMSANNUAL.R, 191.29(a) (191.29(b))

Question Text *Do records indicate NPMS submissions were completed each year, on or before March 15, representing all in service, idle and retired assets as of December 31 of the previous year (excludes distribution lines and gathering lines) occurred, and that if no modifications occurred, an email was submitted stating that fact?*

Assets Covered 88963 (1,877)

Result Notes Reviewed submissions for 2020-2022, all completed by March 15

152. Question Result, ID, References **Sat, RPT.RR.PIPELINEMAPPING.R,**  
 Question Text *Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250 PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Maps have been sent, available in GIS**
153. Question Result, ID, References **NA, RPT.RR.OPID.R, 191.22(a) (191.22(c), 191.22(d))**  
 Question Text *Do records indicate appropriate obtaining, and control of, Operator Identification Numbers (OPIDs), including changes in entity, acquisition/divestiture, and construction/update/uprate?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No acquisition/divestitures during this inspection interval**
154. Question Result, ID, References **NA, RPT.RR.DIRTREPORTS.R,**  
 Question Text *Do records indicate that the operator has submitted reports of damage to the commission using the damage information reporting tool (DIRT) within 45 days?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **No damages on transmission system**

### **TD.ATM: Atmospheric Corrosion**

155. Question Result, ID, References **Sat, TD.ATM.ATMCORRODE.R, 192.491(c) (192.479(a), 192.479(b), 192.479(c))**  
 Question Text *Do records document the protection of above ground pipe from atmospheric corrosion?*  
 Assets Covered **88963 (1,877)**  
 Result Notes
156. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c), 192.481(d))**  
 Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **Reviewed records for 2020-2022, above ground sections inspected annually, OPS 403 states every 3 years NTE 39 months**  
  
**017-R-047 only had inspection completed 4/21/22 on the spreadsheet, completed on paper form December 2019**
157. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c), 192.481(d))**  
 Question Text *Is pipe that is exposed to atmospheric corrosion protected?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **All above ground pipe was well-coated with no visible corrosion**

### **TD.CPMONITOR: External Corrosion - CP Monitoring**

158. Question Result, ID, References **Sat, TD.CPMONITOR.MONITORCRITERIA.R, 192.491(c) (192.463(a))**  
 Question Text *Do records document that the CP monitoring criteria used was acceptable?*  
 Assets Covered **88963 (1,877)**  
 Result Notes **CNG uses a -850 mV criteria or 100 mV shift if needed, isolation readings are >100 mV between the two structures**
159. Question Result, ID, References **Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(a), 192.463(b), 192.463(c), Part 192, Appendix D)**  
 Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*  
 Assets Covered **88963 (1,877)**

Result Notes -850 mV criteria

Procedure followed

calibrated equipment used

160. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))

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

Assets Covered 88963 (1,877)

Result Notes Reviewed records for 2020-2023, all inspections completed annually NTE 15 months

161. Question Result, ID, References Sat, TD.CPMONITOR.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 88963 (1,877)

Result Notes Reviewed records for 01/2020 - 05/2023

Switched to remote monitoring in 2021 with monthly remote reads and annual onsite inspection

162. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)

Question Text Are impressed current sources properly maintained and are they functioning properly?

Assets Covered 88963 (1,877)

Result Notes	Sumas Rectifier	-1873 mV ON, - 1040 mV OFF	1.712 V	1.5 A	RE-0024, 6% tap setting, 50mV:10A Shunt, 7.5 mV across shunt, 1.74 V AC
	Lynden Rectifier	-1853 mV ON, - 966 mV OFF	7.00 V	2.18 A	RE-0014, C1F3 Taps, 1mV:0.2A Shunt, 10.9 mV across shunt, 1.88 V AC 13576 Bayview Edison Rd, Mt Vernon
	Burlington Rectifier	-1705 mV ON, - 1136 mV OFF	6.48 V	8.7 A	New Station with no taps, output controlled via phone/computer to two pipelines (8" and 16"), 1:1 shunt
	Anacortes Rectifier	-2147 mV ON, - 1256 mV OFF	5.92 V	2.74 A	14% Tap setting, 50mV:10A Shunt, 13.7 mV across shunt, 1.904 V AC
	Shelton Rectifier	-1791 mV ON, - 895 mV OFF	3.259 V	0.78 A	4708-001-RE0015, 8 % tap setting, 1mV:0.2A Shunt, 3.9 mV across shunt
	St Andrews Dr Shelton	-2774 mV ON, - 931 mV OFF	14.22 V	1.72 A	RE-0014, 30% Tap setting, 50 mV:10A shunt, 8.6 mV across shunt

163. Question Result, ID, References Sat, TD.CPMONITOR.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 88963 (1,877)

Result Notes Critical bond to BP Cherry Point installed in 2021

Reviewed monthly reads from 05/2021 - 05/2023

164. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.O, 192.465(c)

Question Text Are interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?

Assets Covered 88963 (1,877)

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

165. Question Result, ID, References Sat, TD.CPMONITOR.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 88963 (1,877)

Result Notes Two low CP reads found during annual survey, one location followed up 7 days later, the followed up 5 days later.

Both locations had readings more negative than -850 mV during the followup inspection

One location was attributed to dry soil, the other was incorrect information on the form

166. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.R, 192.469

Question Text Do records identify the location of test stations and show a sufficient number of test stations?

Assets Covered 88963 (1,877)

Result Notes Reviewed maps with test stations identified, number and distribution of stations seems sufficient

167. Question Result, ID, References Sat, TD.CPMONITOR.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 88963 (1,877)

168. Question Result, ID, References Sat, TD.CPMONITOR.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 88963 (1,877)

Result Notes Reviewed interference and AC mitigation records for 2020-2023

One low CP read on 5/11/22, followed up on 6/10/22, good

### TD.CP: External Corrosion - Cathodic Protection

169. Question Result, ID, References Sat, TD.CP.POST1971.R, 192.491(c) (192.455(a), 192.457(a), 192.452(a), 192.452(b), 192.455(f), 192.455(g))

Question Text Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?

Assets Covered 88963 (1,877)

Result Notes Reviewed construction records, all jobs indicated that CP was good post-construction

170. Question Result, ID, References Sat, TD.CP.PRE1971.O, 192.457(b)

Question Text Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I of Part 192?

Assets Covered 88963 (1,877)

Result Notes	4400 Minaker Rd, Bellingham	-1180 mV ON, -1070 mV OFF		
	9056 N Telegraph Rd, Sumas	-1587 mV ON, -1053 mV OFF	-440 mV ON, -420 mV OFF	Casing
	3911 Morgan Rd, Sumas	-1948 mV ON, -1098 mV OFF	-594 mV ON, -589 mV OFF	Casing
	Guide Meridian Rd, Lynden	-1853 mV ON, -1169 mV OFF	-537 mV ON, -537 mV OFF	Casing, CA-1117571
	9005 Jasmine Ln, Lynden	-1662 mV ON, -1040 mV OFF		Lynden Reg Station
	I-5 Casing	-1390 mV ON, -1080 mV OFF	-711 mV ON/OFF	Casing, CA-1116211

Casing at Intalco	-1370 mV ON, -1190 mV OFF	-552 mV ON/OFF	Kickerville Rd, Ferndale CA-1116972
Sedro Woolley Gate	-1190 mV ON, -890 mV OFF	160 mV AC	
SR9 & Lucas Dr, Sedro Wooley	-1322 mV ON, -905 mV OFF	-563 mV ON/OFF	CA-1117090
I-5 & Maiben Rd Casing, Burlington	-1260 mV ON, -933 mV OFF	-522 mV ON/OFF	CA-1116943
S March Point Rd, Anacortes	-1306 mV ON, -1021 mV OFF	-558 mV ON/OFF	CA-1116927
17281 Peterson Rd, Burlington	-1396 mV ON, -1059 mV OFF	-600 mV ON/OFF	47117-001-CA-0036
CA-1117473, Bremerton	-1508 mV ON, -1026 mV OFF	-236 mV Casing	
21 E Dream Ln, Belfair	-2006 mV ON, -1085 MV OFF		

171. Question Result, ID, References **NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))**

Question Text *Do records adequately document the re-evaluation of non-cathodically protected buried pipelines for areas of active corrosion?*

Assets Covered **88963 (1,877)**

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

172. 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 **88963 (1,877)**

Result Notes **Electrical isolation inspection conducted annually, reviewed records for 2020-2023, reads within 100 mV had follow-up inspections completed**

173. 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 **88963 (1,877)**

Result Notes	9056 N Telegraph Rd, Sumas	-1587 mV ON, -1053 mV OFF	-440 mV ON, -420 mV OFF	Casing
	3911 Morgan Rd, Sumas	-1948 mV ON, -1098 mV OFF	-594 mV ON, -589 mV OFF	Casing
	Guide Meridian Rd, Lynden	-1853 mV ON, -1169 mV OFF	-537 mV ON, -537 mV OFF	Casing, CA-1117571
	I-5 Casing	-1390 mV ON, -1080 mV OFF	-711 mV ON/OFF	Casing, CA-1116211
	SR9 & Lucas Dr, Sedro Wooley	-1322 mV ON, -905 mV OFF	-563 mV ON/OFF	CA-1117090
	I-5 & Maiben Rd Casing, Burlington	-1260 mV ON, -933 mV OFF	-522 mV ON/OFF	CA-1116943
	S March Point Rd, Anacortes	-1306 mV ON, -1021 mV OFF	-558 mV ON/OFF	CA-1116927
	17281 Peterson Rd, Burlington	-1396 mV ON, -1059 mV OFF	-600 mV ON/OFF	47117-001-CA-0036
	CA-1117473, Bremerton	-1508 mV ON, -1026 mV OFF	-236 mV Casing	

174. Question Result, ID, References **Sat, TD.CP.CASINGINSPECT.R,**

Question Text *Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?*

Assets Covered **88963 (1,877)**



Result Notes Two low cp areas with possible shorted casings, Colby to followup with chief engineer for possible waiver, High casing read on 5/24/23 and may exceed 120 days

Other location was corrected and found to be not shorted

Reviewed records for 2020-2023

175. Question Result, ID, References Sat, TD.CP.CASINGINSPECT.O,

Question Text Are casings electrically isolated from the pipeline?

Assets Covered 88963 (1,877)

Result Notes	9056 N Telegraph Rd, Sumas	-1587 mV ON, -1053 mV OFF	-440 mV ON, -420 mV OFF	Casing
	3911 Morgan Rd, Sumas	-1948 mV ON, -1098 mV OFF	-594 mV ON, -589 mV OFF	Casing
	Guide Meridian Rd, Lynden	-1853 mV ON, -1169 mV OFF	-537 mV ON, -537 mV OFF	Casing, CA-1117571
	I-5 Casing	-1390 mV ON, -1080 mV OFF	-711 mV ON/OFF	Casing, CA-1116211
	SR9 & Lucas Dr, Sedro Wooley	-1322 mV ON, -905 mV OFF	-563 mV ON/OFF	CA-1117090
	I-5 & Maiben Rd Casing, Burlington	-1260 mV ON, -933 mV OFF	-522 mV ON/OFF	CA-1116943
	S March Point Rd, Anacortes	-1306 mV ON, -1021 mV OFF	-558 mV ON/OFF	CA-1116927
	17281 Peterson Rd, Burlington	-1396 mV ON, -1059 mV OFF	-600 mV ON/OFF	47117-001-CA-0036
	CA-1117473, Bremerton	-1508 mV ON, -1026 mV OFF	-236 mV	Casing

176. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c)) (also presented in: TD.CP.MONITOR, TD.CPEXPOSED)

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

Assets Covered 88963 (1,877)

Result Notes Reviewed CP, isolation, interference, casings, rectifiers and bonds

## TD.COAT: External Corrosion - Coatings

177. Question Result, ID, References Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a)(1), 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 88963 (1,877)

Result Notes Approximately 10 feet installed in Sedro Woolley in 2022, Material sheet indicates 16" 14-16 mil FBE

16' of 2" installed with FBE

2' of 16" FBE in Sedro Woolley

## TD.CPEXPOSED: External Corrosion - Exposed Pipe

178. 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 and deteriorated coating?

Assets Covered 88963 (1,877)

Result Notes Reviewed 10 Integrity Management Dig Report, Pipeline Condition Reports

PSP taken every time coating is removed

179. Question Result, ID, References NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 192.459

Question Text Is exposed buried piping examined for corrosion and deteriorated coating?

Assets Covered 88963 (1,877)



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

180. Question Result, ID, References NA, TD.CPEXPOSED.EXTCORRODREPAIR.R, 192.491(c) (192.485(a), 192.485(b), 192.485(c))

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered 88963 (1,877)

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

## TD.ICP: Internal Corrosion - Preventive Measures

181. 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 88963 (1,877)

Result Notes Reviewed Distribution Line reports from 2021, 2022 and 2023

All documented internal pipe condition, marked as "Good"

182. Question Result, ID, References NA, TD.ICP.EXAMINE.O, 192.475(a) (192.475(b))

Question Text *Is removed pipe examined for evidence of internal corrosion?*

Assets Covered 88963 (1,877)

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

183. 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 88963 (1,877)

Result Notes No internal corrosion found

184. Question Result, ID, References NA, TD.ICP.REPAIRINT.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 88963 (1,877)

Result Notes No internal corrosion found

## TQ.PROT9: OQ Protocol 9

185. Question Result, ID, References NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))

Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*

Assets Covered 88963 (1,877)

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

186. 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 processes or operator approved contractor processes.*

Assets Covered 88963 (1,877)

Result Notes All OQs were verified prior to task performance

See attached

187. Question Result, ID, References Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a))

Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*

Assets Covered 88963 (1,877)  
Result Notes All OQs were verified prior to task performance

See attached

188. 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 88963 (1,877)

Result Notes Personnel were cognizant of AOCs for the respective task

189. 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 88963 (1,877)

Result Notes All OQs were verified prior to task performance

See attached

## TQ.OQ: Operator Qualification

190. Question Result, ID, References Sat, TQ.OQ.OQCONTRACTOR.R, 192.807(a) (192.807(b))

Question Text *Are adequate records containing the required elements maintained for contractor personnel?*

Assets Covered 88963 (1,877)

Result Notes Reviewed a sample of contractor OQs, all good

Roberto Becerra

Donny Winberg

Rafael Aguilar

191. Question Result, ID, References Sat, TQ.OQ.RECORDS.R, 192.807

Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*

Assets Covered 88963 (1,877)

Result Notes Reviewed qualifications for corrosion personnel (Kirk Loy, Kris Wainwright, Stalcup)

Kris Wainwright due 3/18/24, work done in 2022

Kirk Loy due 5/14/23, performing CP reads in 2022

192. Question Result, ID, References Sat, TQ.OQ.TRAINING.R, 192.807(a) (192.807(b))

Question Text *Does the operator have records for initial qualification, re-training and re-evaluation of individuals performing covered tasks?*

Assets Covered 88963 (1,877)

Result Notes Reviewed requalification records for Rafael Aguilar and Roberto Becerra

193. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.R, 192.807(a) (192.807(b), 192.803)

Question Text *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?*

Assets Covered 88963 (1,877)

Result Notes All OQ tasks have associated AOCs and there is an AOC specific task that covered personnel are qualified under

Reviewed various OQ tasks throughout the inspection

## TQ.QU: Qualification of Personnel - Specific Requirements

194. 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 88963 (1,877)

Result Notes Kris Wainwright due 3/18/24, work done in 2022

Kirk Loy due 5/14/23, performing CP reads in 2022

Brandon Croy NACE CP3 Expires 5/31/24

## TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

195. Question Result, ID, References Sat, TQ.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 88963 (1,877)

Result Notes Reviewed NDT qualifications from Mistras

196. Question Result, ID, References Sat, TQ.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 that welders are adequately qualified?*

Assets Covered 88963 (1,877)

Result Notes Reviewed Welder qualifications for Donny Winberg, Rafael Aguilar and Roberto Becerra

## TQ.TR: Training of Personnel

197. Question Result, ID, References Sat, TQ.TR.TRAINING.R, 192.615(b)(2) (192.807(a), 192.807(b))

Question Text *Is training for emergency response personnel documented?*

Assets Covered 88963 (1,877)

Result Notes Reviewed Mock Drill attendance sheets for 2020-2022, 2023 not yet occurred

## DC.CO: Construction

198. Question Result, ID, References Sat, DC.DPC.CCROTCOATLOWER.R, 192.143(b) (192.461(c)) (also presented in: DC.DPC)

Question Text *Do records indicate that each pipe segment with external protective coating was inspected just prior to lowering into the ditch and backfilling, and any damage detrimental to effective corrosion control was repaired?*

Assets Covered 88963 (1,877)

Result Notes Reviewed construction jobs from 2021, 2022 and 2023. All jobs indicated that pipeline was jeeped and holidays were re-wrapped

## DC.SPT: Spike Hydrotest

199. Question Result, ID, References Sat, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, DC.PTLOWPRESS)

Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*

Assets Covered 88963 (1,877)  
Result Notes OPS 505 Section 10

200. Question Result, ID, NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.PTLOWPRESS)  
Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*  
Assets Covered 88963 (1,877)  
Result Notes No such activity/condition was observed during the inspection.
201. Question Result, ID, Sat, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.PTLOWPRESS)  
Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*  
Assets Covered 88963 (1,877)  
Result Notes OPS 505 Section 10
202. Question Result, ID, NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.PTLOWPRESS)  
Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*  
Assets Covered 88963 (1,877)  
Result Notes No such activity/condition was observed during the inspection.
203. Question Result, ID, Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b)) (also presented in: DC.PT, DC.PTLOWPRESS)  
Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*  
Assets Covered 88963 (1,877)  
Result Notes W Cowlitz Way in Longview, no pressure test records, CNG Engineer confirmed this line is part of MAOP validation settlement  
  
WO 18794 in Lynden, no pressure test record, CNG Engineer confirmed this line is part of MAOP validation settlement  
  
Fredonia Line pressure tested 7/28/83, 750 psig, 24 hours  
  
Reviewed pressure test from 1963 in Shelton

## DC.PTLOWPRESS: Pressure Testing - Low Pressure

204. Question Result, ID, Sat, DC.PT.PRESSTEST.R, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented in: DC.PT)  
Question Text *Do records indicate that pressure testing is conducted in accordance with 192.503?*  
Assets Covered 88963 (1,877)  
Result Notes Reviewed jobs from 2021-2023, all data complete and in accordance with 192.503  
  
No pressure tests occurred in 2020
205. Question Result, ID, NA, DC.PT.PRESSTEST.O, 192.503(a) (192.503(b), 192.503(c), 192.503(d), 192.503(e)) (also presented in: DC.PT)  
Question Text *Is pressure testing conducted in accordance with 192.503?*  
Assets Covered 88963 (1,877)  
Result Notes No such activity/condition was observed during the inspection.
206. Question Result, ID, Sat, DC.PT.PRESSTESTENVIRON.R, 192.515(b) (192.629(a), 192.629(b)) (also presented in: DC.PT, References DC.SPT)  
Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, the test medium disposal was conducted in a manner that minimized damage to the environment?*  
Assets Covered 88963 (1,877)

Result Notes OPS 505 Section 10

207. Question Result, ID, **NA, DC.PT.PRESSTESTENVIRON.O, 192.515(b) (192.629(a), 192.629(b))** (also presented in: DC.PT, References DC.SPT)  
Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, the test medium was disposed of in an environmentally sound manner?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such activity/condition was observed during the inspection.**
208. Question Result, ID, **Sat, DC.PT.PRESSTESTSAFETY.R, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, References DC.SPT)  
Question Text *Do records indicate while conducting tests under Subpart J – Test Requirements, every reasonable precaution was taken to protect its employees and the general public throughout the testing?*  
Assets Covered **88963 (1,877)**  
Result Notes **OPS 505 Section 10**
209. Question Result, ID, **NA, DC.PT.PRESSTESTSAFETY.O, 192.515(a) (192.629(a), 192.629(b))** (also presented in: DC.PT, References DC.SPT)  
Question Text *Do field observations confirm while conducting tests under Subpart J – Test Requirements, every reasonable precaution is taken to protect its employees and the general public throughout the testing?*  
Assets Covered **88963 (1,877)**  
Result Notes **No such activity/condition was observed during the inspection.**
210. Question Result, ID, **Sat, DC.PT.PRESSTESTRECORD.R, 192.517(a) (192.517(b))** (also presented in: DC.PT, DC.SPT)  
Question Text *Do records indicate creation and retention of a record for each Subpart J test performed for the required duration?*  
Assets Covered **88963 (1,877)**  
Result Notes **W Cowlitz Way in Longview, no pressure test records, CNG Engineer confirmed this line is part of MAOP validation settlement**  
  
**WO 18794 in Lynden, no pressure test record, CNG Engineer confirmed this line is part of MAOP validation settlement**  
  
**Fredonia Line pressure tested 7/28/83, 750 psig, 24 hours**  
  
**Reviewed pressure test from 1963 in Shelton**

## FS.CS: Compressor Stations

211. Question Result, ID, **Sat, DC.COCMP.CMPCOMBUSTIBLE.O, 192.735(a) (192.735(b), NFPA 30)** (also presented in: DC.COCMP) References  
Question Text *Do field observations demonstrate that flammable/combustible materials are safely stored as required, and aboveground oil or gasoline storage tanks are installed at compressor stations according to 192.735(b)?*  
Assets Covered **88963 (1,877)**  
Result Notes **Materials stored properly and confirmed with FD on access and egress**

## MO.GOCLASS: Gas Pipeline Class Location

212. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also presented in: MO.GO) References  
Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*  
Assets Covered **88963 (1,877)**  
Result Notes **One location identified at culvert crossing due to risk of washout, culvert replaced in 2022 so no longer identified as needing continuing surveillance**  
  
**Reviewed records for 2020-2022**

213. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.O, 192.613(a) (192.613(b), 192.703(a), 192.703(b), 192.703(c))** (also References presented in: MO.GO)  
Question Text *Are unsatisfactory conditions being captured and addressed by continuing surveillance of facilities and the pipeline as required by 192.613?*  
Assets Covered **88963 (1,877)**  
Result Notes **ROW conditions were adequate**

## **MO.GMOPP: Gas Pipeline Overpressure Protection**

214. Question Result, ID, **Sat, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))** (also References presented in: MO.GM)  
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 **88963 (1,877)**  
Result Notes **All records of repairs, patrols, surveys, etc. were readily available**

## **PD.PA: Public Awareness**

215. Question Result, ID, **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: EP.ERG)  
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*  
Assets Covered **88963 (1,877)**  
Result Notes **Reviewed PA mailers to public officials and emergency responders, reviewed records for 2020-2022**

## **PD.RW: ROW Markers, Patrols, Monitoring**

216. Question Result, ID, **Unsat, MO.RW.PATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))** (also presented in: MO.RW)  
References  
Question Text *Do records indicate that ROW surface conditions have been patrolled as required?*  
Assets Covered **88963 (1,877)**  
Result Issue Summary **Based on patrolling records provided by Cascade, there were several missed patrols including quarterly, semiannual and annual patrols as required by 49 CFR 192.705. There were at least three locations with records missing for quarterly patrols, nine locations with records missing for semiannual patrols, and three locations with records missing for annual patrols. These included locations in Anacortes, Mount Vernon, Belfair and Shelton. The missing records were for years 2020, 2021 and 2022.**  
Standard Issues **B1 (Moderate or small impact/widespread occurrence) : 192.705(b) : No record/documentation.**  
Result Notes **Quarterly, Semiannual and Annual missing some patrolling**  
**Reviewed records for 2020-2023**
217. Question Result, ID, **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(c), 192.707(d))** (also presented in: MO.RW)  
References  
Question Text *Are line markers placed and maintained as required?*  
Assets Covered **88963 (1,877)**  
Result Notes **Markers were in good condition and placed where required**
218. Question Result, ID, **Sat, MO.RW.ROWCONDITION.O, 192.705(a) (192.705(c))** (also presented in: MO.RW)  
References  
Question Text *Are the ROW conditions acceptable for the type of patrolling used?*  
Assets Covered **88963 (1,877)**  
Result Notes **ROW is in good condition and is adequate for walking/driving patrol**

## **TD.CPMONITOR: External Corrosion - CP Monitoring**

219. Question Result, ID, **Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c))** (also presented in: TD.CP, References TD.CPEXPOSED)

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

Assets Covered 88963 (1,877)

Result Notes Reviewed CP, isolation, interference, casings, rectifiers and bonds

## **TD.CPEXPOSED: External Corrosion - Exposed Pipe**

220. Question Result, ID, Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c)) (also presented in: TD.CP, References TD.CP.MONITOR)

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

Assets Covered 88963 (1,877)

Result Notes Reviewed CP, isolation, interference, casings, rectifiers and bonds

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.



# FORM D: Intrastate GT Standard Records & Field 8586

UTC Standard Comprehensive Inspection Report  
Intrastate GAS Transmission  
FORM D: State-Specific Requirements

**\*\* THIS FORM IS REQUIRED FOR USE FOR ALL INTRASTATE GAS TRANSMISSION OPERATORS. USE IN CONJUNCTION WITH THE "BASELINE RECORDS" and "BASELINE FIELD OBSERVATIONS" MODULES IN THE MOST CURRENT WA-SPECIFIC GT QUESTION SET**

## Inspector and Operator Information

<b>Inspection Link</b> 8586	<b>Inspector - Lead</b> Norwood, Derek	<b>Inspector - Assist</b>
<b>Operator</b> Cascade Natural Gas	<b>Unit</b> Transmission	<b>Records Location - City &amp; State</b> Virtual
<b>Inspection Start Date</b> 08-08-2023	<b>Inspection Exit Interview Date</b> 10-05-2023	<b>Engineer Submit Date</b>

You must include the following in your inspection summary:

- \*Inspection Scope
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings

### Inspection Scope and Summary

This inspection was a standard inspection of the transmission unit for Cascade Natural Gas. It included a records review and facility inspection at the various transmission segments throughout Washington state. The segments included transmission pipelines in Mount Vernon, Bellingham, Bremerton, Shelton and the Fredonia compressor station. Field inspection notes can be seen in Form R attached to the relevant observation question.

There were two probable violations and two areas of concern as described in the Results Letter and Report.

### Facilities visited and Total AFOD

Facilities visited include transmission pipelines, rectifiers, casings, regulator stations, etc. in Mount Vernon, Bellingham, Bremerton and Shelton along with Fredonia Compressor Station in Mount Venron

Total AFOD: 7 days

3 days of records and 4 days of field observations

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There were two probable violations and two areas of concern as described in the Results Letter and Report. The probable violations included missing compressor station performance test records (49 CFR 192.736) and missing patrolling records (49 CFR 192.705). The areas of concern were leak survey record keeping inefficiencies (WAC 480-93-018) and lack of clarity on the compressor station inspection form (49 CFR 192.736)

### Primary Operator contacts and/or participants

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### Operator executive contact and mailing address for any official correspondence

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## Instructions and Ratings Definitions

### INSTRUCTIONS

S - Satisfactory

### INSPECTION RESULTS

Satisfactory Responses

7

Satisfactory List

1,2,3,4,5,7,8,

Unanswered  
Questions

0

Unanswered  
Questions List

U - Unsatisfactory	Unsatisfactory Responses 0	Unsatisfactory List
Area Of Concern	Area of Concern Responses 0	Area of Concern List
N/A- Not Applicable (does not apply to this operator or system)	Not Applicable Responses 1	Not Applicable List 6,
N/C - Not Checked/Evaluated (was not inspected during this inspection)	Not Checked / Evaluated Responses 0	Not Checked / Evaluated List

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question, and summarized in the appropriate "RECORDS/FIELD OBSERVATION: SUMMARY OF REQUIRED COMMENTS" section at the end of this form.

## ▼ INTRASTATE GT RECORDS REVIEW

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## ▼ MAPPING RECORDS

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## ▼ REPORTING RECORDS

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### Question 1

Do records indicate that the operator filed with the commission, not later than March 15 of each year, applicable to the preceding calendar year: a copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.2-1 annual report?

#### Q8 Reference

WAC 480-93-200(10)

#### Q1 Result

Satisfactory

#### Q1 Notes

Annual reports submitted by March 15, reviewed records for 2020, 2021 and 2022

## ▼ DAMAGE PREVENTION RECORDS

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### Question 2

Do records indicate that the operator's locating and excavation practices are in compliance with all RCW 19.122 requirements for facility operators? Does the records sample indicate that locates are made within two business days?

#### Q9 Reference

RCW 19.122

#### Q2 Result

Satisfactory

#### Q2 Notes

Reviewed a sample of locates tickets from 2020-2023 for each district, no concerns

### Question 3

Do records indicate that the operator uses a quality assurance program for monitoring the locating and marking of facilities? Does the operator conduct regular field audits of the performance of locators/contractors and implement appropriate corrective action when necessary?

#### Q3 Reference

PHMSA State Program Question

#### Q3 Result

Satisfactory

#### Q3 Notes

Utility Group Locate Audit Form completed for mislocates, corrections made based on findings

### Question 4

Do records indicate that the operator's (organic or contracted) locator and excavator personnel are properly qualified in accordance with the operator's OQ plan and with state OQ requirements?

#### Q4 Reference

WAC 480-93-013

#### Q4 Result

Satisfactory

#### Q4 Notes

Reviewed OQs for personnel in transmission districts, locating line, locate underground pipelines

Reviewed OQs for excavation personnel, damage prevention during excavation

**Question 5**

Do records indicate that the operator is meeting requirements in RCW 19.122.035 with respect to their duties after notice of excavation? Are examinations of uncovered pipe conducted prior to reburial? Does the operator immediately notify local first responders and the commission of any blowing gas leak that has ignited or represents a probable hazard to persons or property?

**Q5 Reference**

RCW 19.122.035

**Q5 Result**

Satisfactory

**Q5 Notes**

Reviewed exposed pipe condition reports from 2020-2023, CNG is onsite if a 3rd party will expose their pipe

**Question 6**

Do records indicate that the operator reviews records of accidents and failures caused by excavation damage to ensure the causes of those failures are addressed to minimize the possibility of reoccurrence?

**Q6 Reference**

PHMSA State Programs Emphasis - no link

**Q6 Result**

Not Applicable

**Q6 Notes**

No failures on the transmission system during this inspection period

## DESIGN/CONSTRUCTION RECORDS

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**Question 7**

Do construction/installation records indicate that the operator is complying with WAC 480-93-115 requirements to seal the casing ends of any transmission line installed in a casing or conduit? If casings are installed, is the operator installing only bare steel casings?

**Q21 Reference**

WAC 480-93-115

**Q7 Result**

Satisfactory

**Q7 Notes**

Casing installed in 1992, as-built had details for cas seals and insulators

## CORROSION CONTROL RECORDS

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## OPERATIONS & MAINTENANCE RECORDS

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**Question 8**

Do odorization records demonstrate appropriate odorization levels, testing, instrumentation, calibration, and adherence to applicable intervals in accordance with WAC 480-93-015? Does the operator retain records of tests performed and equipment calibration for 5 years? Does the operator take prompt action to investigate and remediate odorant concentrations not meeting the minimum requirements (as applicable)?

**Q8 Reference**

WAC 480-93-015

**Q8 Result**

Satisfactory

**Q8 Notes**

Reviewed a sample of equipment IDs from monthly tests to check for calibration, no concerns

## RECORDS: SUMMARY OF REQUIRED COMMENTS

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**RECORDS REVIEW SUMMARY:** Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment

## INTRASTATE GT: FIELD OBSERVATIONS

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## FIELD: SUMMARY OF REQUIRED COMMENTS

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**FIELD OBSERVATIONS SUMMARY:** Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above and ensure you annotate the question number for each comment.

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