



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email

June 16, 2021

James Storoshenko
VP Systems and Field Operations
Petrogas West LLC
205 5th Ave SW, Suite 3900, Bow Valley Square 2
Calgary, Alberta, Canada T2P 2V7

RE: 2021 Hazardous Liquid Annual Review – Petrogas West, LLC. – (Insp. No. 8289)

Dear Mr. Storoshenko:

Staff from the Washington Utilities and Transportation Commission (staff) conducted an annual review inspection of Petrogas West, LLC., (Petrogas), on June 10, 2021. The inspection included a review of company manuals focused on program changes during the previous year.

No apparent violations were noted as a result of the inspection. This inspection will be closed as of the date of this letter.

Staff thanks Petrogas' personnel for their professionalism and cooperation during this inspection.

If you have any questions or if we may be of any assistance, please contact Scott Anderson at (360) 481-6978.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

cc: Gatlin McConnell, Safety Coordinator, Petrogas
Gavin Carscallen, VP Legal, Petrogas
Kent Wentworth, VP Risk Management, Petrogas
Gary McSpadden, Operations Manager, Petrogas

Respect. Professionalism. Integrity. Accountability.

Form A- Annual Review 8289

UTC Standard Annual Review Inspection Report
Intrastate Operators
FORM A: Annual Review

Print Inspection Record PHMSA Pipeline Regulations PHMSA Advisory Bulletins

Inspector and Operator Information

Inspection ID 8289	Inspection Link 8289	Inspector - Lead Scott Anderson	Inspector - Assist
Operator Petrogas West LLC	Unit Petrogas - Ferndale Storage Terminal	Records Location - City & State Ferndale, WA	
Inspection Start Date 06-10-2021	Inspection Exit Interview Date 06-10-2021	Engineer Submit Date	

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

This inspection was an annual review of the City of Enumclaw's Natural Gas Department.

1 AFOD

No significant findings came as a result of this review

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses 11	Satisfactory List 1,3,9,10,12,24,26,27,28,32,	Number of Unanswered Questions 0	Unanswered List
Unsatisfactory Responses 0	Unsatisfactory List		
Area of Concern Responses 0	Area of Concern List		
Not Applicable Responses 29	Not Applicable List 4,5,6,7,8,13,14,15,16,17,18,19,20,21,22,23,25,29,30,31,34,35,37,38,39,40,42,43,44		
Yes Responses 0	Yes List	No Responses 2	No List 36,41
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 also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

Crew Inspection History

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
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Facility Inspection History

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
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Scheduled Inspection History

Annual Review Inspection History

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
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GAS System Operations History

Annual Report - Miles of Main

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
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Annual Report GAS Transmission Miles

YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
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Annual Report - Leaks

Year	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
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Annual Report - EFV

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Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
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HL System Operations History

HL Annual Report - Miles of Pipe by Decade

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre-20s	1920-1929	1930-1939	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989
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HL Annual Report - HL Miles / HCAs

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water
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HL Annual Report - Breakout Tanks

YEAR	Operator	Commodity Group	Crude Oil #5	Refined (nor HVL #5)
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ANNUAL REPORT: ACCURACY/TRENDS

Question #1.

Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.

1. Result

Satisfactory

1. Notes

Annual report submitted 6/9/2021 for CY 2020. Annual report was reviewed for accuracy and trends.

Access to Complete Distribution Annual Report

Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
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Access to Complete Transmission Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
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Access to Complete Hazardous Liquid Annual Report

YEAR	Operator	Commodity Group
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DAMAGE PREVENTION

Annual Report Damage Prevention data

Year	Operator	Total Number of Excavation Damages By Apparent Root Cause:	Number of Excavation Tickets	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services
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DIRT data on mismarks for prior year

Damage Cause	Number of Reports
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DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.

SubmitCompanyID - UTCfinalName	Number of Reports
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Question #2.

Review the following damage prevention items:

Q2. Is the damage prevention information in the annual report complete?

http://yes

Q2.b. Is the annual report damages root cause information complete and accurate?

yes

Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?

yes

Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

yes

Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?

yes

Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?

yes

Q2.g. What is the number of damages resulting from mismarks?

0

Q2.h. What is the number of damages resulting from not locating within the time requirements?

0

Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?

yes

Q2.j. Are mapping corrections timely and according to written procedures?

yes

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?

yes

Q2.l. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?

yes

2. Notes

Petrogas is part of a one-call system. All facility assets are inside the terminal fence, the only one-calls are internal. The facility is at the end of Unick Rd. in Ferndale, any activity near the line is observed by a 24/7 security guard.

NPMS SUBMISSIONS/CHANGES

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

3. Result

Satisfactory

3. Notes

NPMS submittal date 6/9/21 for CY 2020. No changes

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Results

Not Applicable

4. Notes

No federally reportable incidents.

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
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Question #5.
Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?
5. Result
Not Applicable

5. Notes
No accidents or failures in the previous year

Question #6.
Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

Q6: Incident Reports

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
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6. Result
Not Applicable

6. Notes
No incidents in the previous year

Question #7.
Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

Q7: Report of SRCs

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
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7. Result
Not Applicable

7. Notes
No SRCs in the previous year.

Question #8.
For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.
8. Result
Not Applicable

8. Notes
No AOCs in the previous year.

O&M & EMERGENCY PROGRAMS

Question #9.
Is the O&M Manual up to date and were changes made in the previous year?
Operator Manuals on Sharepoint
9. Result
Satisfactory

9. Notes
Manual is up to date. Changes made in 2021 are: Address updated, revised verbiage to non-DOT equipment, added Mechanical Chiller procedure, updated fire eye and hydrocarbon detection count, updated appendices.

Question #10.
If changes to the O&M were made, are changes acceptable?
10. Result
Satisfactory

10. Notes
Acceptable

Question #11.
Were emergency plans changed during the previous year?

11. Result
Satisfactory

11. Notes
Change in address was the manual change in the previous year.

Question #12.
Were any changes to emergency plans satisfactory?

12. Result
Satisfactory

12. Notes
Changes satisfactory

INTEGRITY MANAGEMENT PROGRAMS

Question #13
Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?
13. Result
Not Applicable

13. Notes
No integrity plan, due to no HCAs. All assets are inside terminal fence.

Question #14.
Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?
14. Result
Not Applicable

14. Notes
No integrity plan, due to no HCAs. All assets are inside terminal fence.

Question #15
Are IMP program changes acceptable?
15. Result
Not Applicable

15. Notes
No integrity plan, due to no HCAs. All assets are inside terminal fence.

Question #16
Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)
16. Results
Not Applicable

16. Notes
No integrity plan, due to no HCAs. All assets are inside terminal fence.

Question #17		17. Results
Does the operator's HCA location data correspond to the positional data located in UTC GIS?		Not Applicable
17. Notes		
No integrity plan, due to no HCAs. All assets are inside terminal fence.		
Question #18		18. Results
What assessment work is planned for the upcoming year?		Not Applicable
18. Notes		
No integrity plan, due to no HCAs. All assets are inside terminal fence.		
Question #19		19. Results
Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?		Not Applicable
19. Notes		
No integrity plan, due to no HCAs. All assets are inside terminal fence.		
Question #20		20. Results
Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)		Not Applicable
20. Notes		
No low pressure, this is a liquid system.		
Question #21		21. Results
Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?		Not Applicable
21. Notes		
No plastic pipe		
Question #22		22. Results
Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)		Not Applicable
22. Notes		
No integrity plan, due to no HCAs. All assets are inside terminal fence.		
Question #23		23. Results
What DIMP remediation work is anticipated for upcoming year?		Not Applicable
23. Notes		
No integrity plan, due to no HCAs. All assets are inside terminal fence.		

QO PROGRAM

Question #24		24. Results
Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.		Satisfactory
24. Notes		
OQ program is up to date, no changes in the previous year. Review was done 6/9/2021		
Question #25		25. Results
Are the OQ plan updates satisfactory?		Not Applicable
25. Notes		
Question #26		26. Results
Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?		Satisfactory
26. Notes		
Personnel performing covered tasks are qualified through Energy WorldNet. Qualifications are good for 3 years.		

PUBLIC AWARENESS PROGRAM

Question #27		27. Results
Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?		Satisfactory
27. Notes		
PA manual was reviewed 5/14/20. Changes were: Annual program review and evaluation, stakeholder updates, stakeholder letter submitted, Intelix merge code implementation.		
Question #28		28. Results
Are changes to the PA program satisfactory?		Satisfactory
28. Notes		
Changes are good.		

CONTROL ROOM PROGRAM

Question #29		29. Results
Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?		Not Applicable
29. Notes		
No control room. Appendix J in O&M manual		
Question #30		30. Results
Are the CRM program changes satisfactory?		Not Applicable
30. Notes		
No control room		

SAFETY MANAGEMENT SYSTEM API 1173

Question #31		31. Results
Is the operator developing and implementing an API 1173 Safety Management System?		Not Applicable
31. Notes		

Operator is not developing and implementing an API 1173 Safety Management System.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units? **32. Results** Satisfactory

32. Notes

Only 1 unit.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.D How to get additional information ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.M Emergency Preparedness

33. Notes

ADVISORY BULLETIN REVIEW

Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Results

Not Applicable

34. Notes

No potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration

Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Results

Not Applicable

35. Notes

No potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration

Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Results

NO

36. Notes

No potential for the operator's system to be damaged by earth movement or other seismic/geological activities

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Results

Not Applicable

37. Notes

potential for the operator's system to be damaged by earth movement or other seismic/geological activities

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Results

Not Applicable

38. Notes

No meter sets. This is a liquid terminal

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01

ADB 2020-01 Inside Meter Sets

39. Results

Not Applicable

39. Notes

No meter sets. This is a liquid terminal.

Question #40

Does the operator have a detailed record of locations for all indoor meter sets/regulators within their system?

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Results

Not Applicable

40. Notes

No meter sets. This is a liquid terminal

Question #41

Does the operator have any low pressure systems?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

41. Results

NO

41. Notes

No low pressure systems. This is a liquid terminal.

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02
ADB 2020-02 Low Pressure Systems

42. Results
Not Applicable

42. Notes
No low pressure systems. This is a liquid terminal.

Question #43
For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02
ADB 2020-02 Low Pressure Systems

43. Results
Not Applicable

43. Notes
No low pressure systems. This is a liquid terminal.

Question #44
Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02
ADB 2020-02 Low Pressure Systems

44. Results
Not Applicable

44. Notes
No low pressure systems. This is a liquid terminal.

 **SUMMARY OF REQUIRED COMMENTS**

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.