



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*Sent via email*

June 27, 2024

Esiquiel Rodriguez  
Regional Unit Director  
J. R. Simplot Company  
1099 West Front St  
Boise, Idaho 83702

**RE: 2024 Bio-gas Transmission Operations & Maintenance , Plan & Procedures Review  
Inspection – J.R. Simplot Company – (Insp. No. 8848)**

Dear Mr. Rodriguez:

Staff from the Washington Utilities and Transportation Commission (staff) conducted an Operations & Maintenance (O&M), Plan & Procedures review inspection of J.R. Simplot Company on May 17, 2024. This inspection included a process and procedures review of the O&M plan.

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

**Your response needed**

Please review the attached report and respond in writing by July 29, 2024. The response should include how and when you plan to bring the area of concern into full compliance.

**What happens after you respond to this letter?**

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

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

J. R. Simplot Company

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If you have any questions or if we may be of any assistance, please contact Anthony Dorrough at (360) 481-4035. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Scott Rukke

Pipeline Safety Director

cc: Doug Erickson, Principal Consultant, Everline  
Andrew Eickson, Environmental Manager, J. R. Simplot Company

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2024 Bio-Gas Transmission Pipeline Safety Inspection**  
**J.R. Simplot Company**

The following area of concern of WAC 480-93 was noted as a result of the 2024 inspection of the J.R. Simplot Company Bio-Gas Transmission Operations & Maintenance, Plan & Procedures Review (O&M) .

**AREA OF CONCERN**

**1. WAC 480-93-180 Plans and Procedures.**

*(1) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*

**WAC 480-93-160 Reporting Requirements of proposed Construction.**

*(1) Each gas pipeline company must file a proposed construction report with the commission at least forty-five days prior to construction or replacement of any segment of a gas transmission pipeline equal to or greater than one hundred feet in length. Emergency repairs are exempt from this section.*

**Finding(s):**

Staff could not find a process to file a proposed construction report or replacement process for transmission pipeline of at least 100 ft. within the plan. Although there was no proposed construction or pipeline replacement during the inspection period, there is a requirement that a process and/or procedure be developed for either of these situations. Staff believes having a process in place to notify the Commission, should you need to undertake construction in the future, would ensure notification occurs.