

May 20, 1988

Mr. H. R. Garabrant, P.E.
Utility engineer Analyst
Gas Unit/energy Division
Public Utility Commission of Oregon
Labor & Industries Building
Salem, Oregon 97310-0338

Dear Mr. Garabrant:

This responds to you May 11, 1988, letter formally notifying us that the Commission has granted CP National Corporation a waiver from the burial requirement of 49 CFR 192.321(a). The waiver permits installation of a temporary plastic pipeline (4" Aldyl A) above ground and across the Rouge River in Grants Pass, Oregon. The temporary line is needed to serve about 1800 customers during replacement of an existing steel line at the river crossing.

As our enforcement personnel may have previously stated in telephone conversations with you, we have no objection to temporary use of the proposed plastic pipeline. However, in addition to meeting applicable Part 192 requirements including the temperature limitation of §192.123, we believe that the following safeguards should be added:

1. Install temporary markers along the line at intervals needed to adequately warn the public, including meaters, of the presence of a gas pipeline.
2. Patrol the line twice weekly to ensure it is in a safe condition.

We request that these safeguards be made conditions of the waiver. Once this is accomplished, the waiver may take effect as scheduled.

Sincerely,
Original Sign By
Richard L. Beam
Director
Office of Pipeline Safety

PUBLIC UTILITY COMMISSION OF OREGON
LABOR & INDUSTRIES BUILDING
SALEM, OREGON 97310-0335

May 11, 1988

Dick Beam, Director
Pipeline Safety DPS-1
US Dept of Transportation/RSPA
400 7th St SW - Room 8417
Washington DC 20590

Attached is a written copy of the Commissioners' approval dated May 10, 1988, concerning the waiver request from CP National Corporation dated May 5, 1988. Your written approval confirming previous telephone approval would be appreciated.

Unfortunately, the normal 60-day written notice of approval was not possible in this case due to circumstances beyond the utility's control.

I notified the Western Region office (Jack Overly) May 5, 1988, that we were approving the waiver.

Your office (William Gute) was notified by the Western Region office (Jack Overly), and telephone approval from your office (Linda Altavilla) was received by me on May 6, 1988. The telephonic approval was immediately transmitted by telephone to CP National on May 6, 1988.

The paperwork process was started immediately. The written request for approval was presented to the Commissioners by staff with the recommendation to approve on May 10, 1988, at open meeting. The waiver, with certain understandings, was approved at this meeting.

H. R. Garabrant, P.E.
Sr. Utility Engineering Analyst
Gas Unit/Energy Division

PUBLIC UTILITY COMMISSION OF OREGON
LABOR & INDUSTRIES BUILDING
SALEM, OREGON 97310-0335 May 10, 1988

Mr J P Paris, Vice President
CP National Corporation
PO Box 1709
Medford OR 97501

The request for a waiver of Part 192.321(a) requested by letter, dated May 5, 1988, to install a temporary bypass consisting of 4-inch polyethylene Aldyl "A" pipe above ground and across the Rogue River on a suspended cable in Grants Pass, Oregon, by Lewis Benjamin is approved effective immediately for 90 days.

It is our understanding that as a combined gas-electric company, your electrical engineers will design the supporting structures for the river crossing and include in the design and stress analysis, the factor for a 60-mile-an-hour wind with a suitable safety factor.

It is our understanding from telephone conversations between our staff and your company that gas service to approximately 1,800 customers will be at risk and an outage would probably occur if the temporary bypass line were not installed. Also, pressure tests were conducted which indicated that the customers south of the river cannot be reliably supplied from an existing alternate feed. We understand that the temporary overhead line will not entail appreciable risks to the public or employees near to the river crossing. It is also our understanding that you will keep our gas safety engineer apprised as to your final plans, schedule of installation, tests, and start-up times.

Obviously, this waiver approval does not eliminate the need for obtaining the necessary right-of-way permits and approvals of private and other governmental agencies involved as well as meeting the normal DOT pipeline safety requirements.

Since the start of the action required will take place in less than the 60 days which DOT needs for written notice, DOT was notified by telephone and DOT has given their approval by telephone. A copy of your written request and a copy of this letter will be forwarded to them to back up the telephone request and approvals that have been given.

Please ensure that permanent facilities are installed at the very earliest date and that all necessary safety precautions are taken while the temporary facility is in place.

Rpm Eachus
Commissioner, Chair

Myron B. Katz
Commissioner

Nancy Ryles
Commissioner

CP National
229 W. Main Street
P.O. Box 1709
Medford, OR 97501

May 5, 1988

Mr. H.R. Garabrant, P.E.
Sr. Utility Engineering Analyst
Gas Unit/Energy Division
Public Utilities Commission of Oregon
Labor and Industries Building
Salem, Oregon 97310

Subject: Request for a waiver to install a temporary 4" plastic line above ground.

Dear Bob:

Per our phone conversation this afternoon, CP National formally requests a waiver to install a temporary 4" Aldyl A plastic line above ground for the purpose of replacing a 6" distribution line that crosses the Rogue River in Grants Pass Oregon. This emergency situation was brought about by the failures of a 10" and 12" sewer line that were dumping thousands of gallons of raw sewerage into the river each day. Our 6" gas line is located in the same concrete box as both of the failed sewer lines.

The city of Grants Pass has requested and received an emergency permit, #071-OYA-4-007878, from the Corp of Engineers and the Fish and Wildlife Commission to construct a new sewer crossing at the same location and in the same trench as the old lines. The new sewer lines have been requested to be installed 10 to 12 feet deeper than the existing lines due to the river seeking a new lower elevation at this location. In order to comply with this request the city has been told they must remove the old river crossing completely from the river. Our 6" distribution line supplies gas to about 1800 customers located on the south side of the river.

We have investigated alternate ways of supplying gas to the south side of the river and due to time restraints placed on the city of Grants Pass to complete the work we find that our only solution is to install a temporary line across the river while the new gas and sewer lines are installed.

The City of Grants Pass is sending out for bids on May 9th and plans to award the bid on May 18th with the work commencing as soon after that date as possible.

As you can see this doesn't give us much time. The Fish and Wildlife Commission has requested that the work be completed by May 30th in order to prevent problems with the summer salmon run.

We are attaching maps of the proposed temporary relocation plus an aerial view of the site as it is today, showing part of the river diverted.

If you require further information, please advise.

Very Truly Yours
Louis Benjamin
Corrosion Control Supt.

City of Grant Pass
101 N.W. "A" Street
Grants Pass, Oregon 97526

April 13, 1988

CP National Gas
P.O. Box 1709
Medford, Oregon 97501

Re: Proctor Siphon Sewer Line River Crossing

This letter is to formally notify you that we intend to remove our sewer line under the river and place it some ten feet further down. The line, designated as the Proctor Siphon, also has a natural gas line. We are requesting that you relocate your line. You need to contact Dave Wheaton, our Utility Superintendent, for removal dates. He can be reached at the Grants Pass Municipal Building at 474-6355. Since the City is in an emergency situation, you need to contact him immediately.

Since we have not received any inquiries from you on the future placement of your line, we assume you are making your own arrangements for crossing the river at some location other than our trench.

Sincerely yours,
Peter M. Linden
City Attorney

PUBLIC UTILITY COMMISSION OF OREGON
LABOR & INDUSTRIES BUILDING
SALEM, OREGON 97316-0335

June 10, 1988

Dick Beam, Director
Pipeline Safety DPS-1
US Dept of Transportation/RSPA
400 Seventh St SW - Rm 8417
Washington DC 20590

This is to formally advise you that CP National's request, dated May 5, 1988, to allow a temporary plastic pipeline over the Rogue River in Grants Pass, Oregon, is hereby cancelled.

The waiver was not and will not be utilized. Other plans were made. See the attached letter.

Incidentally, I was on hand when the alternate route across the bridge using 4-inch steel pipe was installed. This route included an upgrading of a portion of the system on the north side of the river feeding the 4-inch line across the bridge. I was present during the upgrading procedure also.

I thank you for DOT's quick response to okay the waiver we issued when it appeared that 1,800 customers were being jeopardized.

H. R. Garabrant, P.E.
Sr. Utility Engineering Analyst
Gas Unit/Energy Division

CP National
P. O. Box 1709/201 W. Sixth Street
Medford, OR 97501

June 6, 1988

H. R. Garabrant, P.E.
Senior Utility Engineering
Analyst
Gas Unit/Energy Division
Oregon Public Utility Commission
Labor and Industries Building
Salem, OR 97310

Dear Mr. Garabrant:

This is to confirm our telephone conversation with Mr. Jack Dent on May 27, 1988, that we will not need the waiver to place a temporary plastic pipe above ground and across the Rogue River in Grants Pass, Oregon.

It has been determined that we could safely install a 4" steel gas line across the river through the 7th Street bridge. CP National was concerned about hanging the plastic line over the river. Also, our negotiations with the City of Grants Pass over CP National's share of the river crossing costs were very unclear and at a stand still. By using the bridge crossing we will eliminate concerns over future river bank erosion.

Thank you for your assistance to secure the waiver from D.O.T.

Very truly yours,
J. B. Nolan
Director Gas Operations