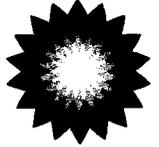


bp

RECEIVED

JUN 05 2007



U.S. Pipelines and Logistics

BP Pipelines (North America) Inc.
28100 Torch Parkway
Warrenville, Illinois 60555

June 4, 2007

SENT TO COMPLIANCE REGISTRY
Hardcopy Electronically
of Copies 1 / Date 6/5/07

Chris Hoidal, P.E.
Director, Western Region
Pipelines and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228

Re: Notice of Amendment - CPF 5-2007-5020M

Dear Mr. Hoidal:

BP Pipelines respectfully submits the following responses on behalf of BP Exploration Alaska (BPXA) to the referenced Notice of Amendment, received by BPXA on May 7, 2007, regarding the Operator Qualification procedures and records inspection in Anchorage, Alaska on September 13-14, 2006.

As you will note, our response to items 2. and 3. below include plans on how these items will be addressed. Although not yet posted in the revised OQ Plan, we are in the process of harmonizing the OQ plans of BPXA and BP Pipelines. We are also addressing secondary items and noted improvements that are ongoing which will be consolidated in one update targeted for 3Q 2007. Thereafter, all updates will be posted in the revised OQ Plan. The apparent inadequacies found within BPXA's plans or procedures, as noted in your letter, are described below, along with BPXA's responses:

1. §192.805 & 195.505 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) Identify covered tasks

BPXA's written OQ plan needs provisions to identify the "TRT" inspection procedure for atmospheric corrosion on weld packs as a covered task. Although the individuals are qualified to perform the tasks, the written program does not address the need to qualify individuals to perform the task or address the inspection as a covered task.

BPXA Response:

BPXA's written OQ plan has incorporated the Tangential Radiography Testing (TRT) as a Covered Task within the Inspection & Performance Prevention Methods for Atmospheric Corrosion section as of September 21st, 2006.

2. §192.805 & 195.505 Qualification program.

Each operator shall have and follow a written qualification program.

The program shall include provisions to:

- (b) Ensure through evaluation that individuals performing covered tasks are qualified;**

BPXA's written OQ plan needs provisions to include the following:

- Designate the acceptable evaluation methods that contractors may utilize when evaluating individuals from an outside source and ensure those qualifications meet BPXA requirements.
- Stipulate that the newly acquired employees deemed unqualified by BPXA officials will receive initial qualification before performing covered tasks without being directed and observed by a qualified individual.

BPXA Response:

Item #1- OQ Plan, Contractor Qualifications Section, will be updated to state the acceptable evaluation methods that contractors may utilize when evaluating individuals obtained from outside sources.

Item #2 - OQ Plan, Asset Acquisition & Qualifications Section, will be updated to state that initial qualifications for new employees will be completed prior to performing covered tasks, unless covered tasks are directed and observed by a qualified individual.

3. §192.805 & 195.505 Qualification program.

Each operator shall have and follow a written qualification program.

The program shall include provisions to:

- c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;**

BPXA's written plan must make clear that the qualified individual is responsible for the performance of a covered task; use the term "direct and observe" or variations of it instead of less specific terms like "supervise" or "be on site" or "at the location".

BPXA Response:

BPXA written OQ plan will be updated to reflect that qualified individuals are responsible for performance of any covered tasks and that "direct and observe" language will be used in lieu of less specific terminology. This update will provide a more comprehensive understanding of the process and expectations in the performance of covered tasks.

If you have any questions pertaining to this matter, please contact Dave Barnes at (630) 836-3435.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Schau', written over a horizontal line.

Gerald E. Schau
HSSE & Integrity Manager

cc: Sandy Stash - BPXA
Doug Suttles - BPXA
Tony Brock - BPXA
Angus Walker - BPXA