

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 20, 2010

Mr. Anthony Brock
VP HSSE & Engineering
BP Exploration Alaska
P.O. Box 196612
900 E. Benson Blvd.
Anchorage, AK 99519

CPF 5-2010-5009M

Dear Mr. Brock:

On June 22-23, 2009, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected BP Exploration Alaska Inc.'s (BPXA) procedures for "Endicott Sales Oil Pipeline DOT Operation, Maintenance, Emergency Response Manual (OMER)" in Anchorage, Alaska.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within BPXA's Endicott Pipeline plans or procedures, as described below:

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) **General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.**

BPXA's Endicott Procedure NP-4800, "Pig the Endicott Pipeline," for launching and receiving pigs is not adequate because it does not reflect the actual setup of the launcher and receiver. Both

the launcher and receiver have a pressure sensing device which must be removed prior to opening the closure and must be installed after closing the closure, but prior to pressurizing the barrel. The procedures are silent in regards to the pressure sensing devices and the pressure sensing devices are not indicated on the drawings in Appendix A and B of the procedures.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 90 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF 5-2010-5009M** and send all responses to 188 W. Northern Lights Blvd. Suite 520, Anchorage, Alaska 99503, and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Dennis Hinnah
Deputy Director, Western Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

cc: PHP-60 Compliance Registry
PHP-500 B. Flanders (#123920)