

U.S. Pipelines and Logistics

BP Pipelines (North America) Inc.
150 W. Warrenville Rd
Naperville, Illinois 60563

February 16, 2012

Mr. Wayne T. Lemoi
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street NE
Suite 600
Atlanta, Georgia 30303

Re: Notice of Amendment CPF 2-2012-1002M

Dear Mr. Lemoi:

Destin Pipeline Company, LLC (Destin), is writing in response to the referenced Notice of Amendment received in our offices on January 18, 2012, regarding the pipeline safety inspection of Destin's facilities from September 12-16, 2011.

Three findings were identified as requiring follow-up actions to address amendments to procedures. Destin has revised its procedures and referenced specifications to ensure that each of these requirements is specifically answered. For ease of response, the code citation and DOT's statements to us have been copied below in italics and are followed by Destin's response.

1. **§192.707 Line markers for mains and transmission lines.**
... (d) Marker warning. The following must be written legibly on a background of sharply contrasting color on each line marker:
(1) The work "Warning", "Caution", or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with 1/4 inch (6.4 millimeters) stroke.

DOT Statement:

Destin's procedures for placing and maintaining transmission line markers were inadequate because they did not require line markers for transmission lines to include the words "Gas (or name of gas transported) Pipeline."

Destin's OMER procedure P-192.614, Section XII, Pipeline Permanent Marker Program conveyed: Marking and identification of BP [includes Destin Pipeline] rights of way will be marked and identified in accordance with BP procedures: Specification for Auxiliary

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Installations (Site Technical Practices STP 43-119 and/or Affiliate Equivalent. *The procedure provided to the inspector during the inspection, SP-119 BP Pipelines, N.A. Specification for Auxiliary Installations (SP-119) did not require markers to be marked with the words “Gas (or name of gas transported) Pipeline.”*

BP Response:

Please be advised that the referenced specification SP-119 (STP 43-119) has been revised to include references specific to gas pipeline markers. The specification now includes language that identifies the requirement to include the words “Gas Pipeline” on gas transmission line markers. Excerpts from the revised specification identifying the revised language are attached (See Section 8.0, Pipeline Markers and Section 13.0, Carsonite Line Markers, and applicable Exhibits).

2. **§192.731 Compressor stations: Inspection and testing of relief devices.**
...(c) Each remote control shutdown device must be inspected and tested at intervals not exceeding 15 months, but at least once each calendar year, to determine that it functions properly.

DOT Statement:

Destin’s procedures for recording the results of the inspection and testing of relief devices were inadequate because they did not require sufficient documentation to show that the inspections and/or tests were completed so as to ensure the relief devices functioned properly.

Destin’s Maximo work order Compressor Station ESD Test did not require that the performance of all location-specific lists of these shut down devices were not referenced or included in the work order.

BP Response:

Please be advised that the referenced Maximo job plan, Compressor Station ESD Test, has been revised. The job plan now incorporates location-specific ESD lists so that generated work orders will distinctly identify each of the ESD devices in the compressor station to be inspected. A sample copy of the revised job plan at Destin compressor stations (Pascagoula and Sand Hill) is attached.

3. **§192.731 Compressor stations: Gas detection.**
...(c) Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.

DOT Statement:

Destin’s procedures for maintaining each gas detection and alarm system to function properly were inadequate because they did not require sufficient documentation to show that gas detection and alarm system performance tests were adequately performed.

DOT – Destin NOA Response
February 16, 2012

Destin's Maximo work order Gas Detector Functional Check did not require that the performance of all location-specific alarms (i.e. audible, visual) be documented. Moreover, location-specific lists of these alarms were not referenced or included in the work order.

BP Response:

The referenced Maximo job plan, Gas Detector Functional Check, has been revised. This job plan now includes specific sections to verify that both audible and visual alarms are checked to ensure they are in proper working order and documented accordingly. A sample copy of the revised job plan is attached.

I trust the actions taken sufficiently address the Notice of Amendment findings identified during the 2011 inspection. Should you have any questions or require further information, please feel free to contact me directly at (630)536-3419, or alternatively Michael Sanders at (630)536-3495.

Sincerely,



David O. Barnes, P.E.
Manager, DOT Compliance
BP Pipelines (North America) Inc.

Enclosures

cc: Steve Pankhurst - Business Unit Leader, BP Pipelines (North America) Inc.
Kirsty Clode - Performance Unit Leader, BP Pipelines (North America) Inc.

5.0 BLOCK VALVES

CONTRACTOR shall install block valves, where designated by COMPANY, in accordance with the construction drawings. WORK may include but is not limited to the erection of chain link protective fencing, as well as the installation of transition nipples where required. Installation of check valves will be included where specified. Typical installation is shown on Exhibit "119-3". Block valve settings will be installed above grade.

6.0 SPANS

Spans over ditches or gullies are not permitted. Existing pipeline spans of ditches or gullies are "grandfathered" - accepted provided they are allowable under the Code of Record for that system. Spans caused by erosion shall be evaluated on a case-by-case basis for continued safe operation. Crossings of ditches or gullies shall maintain the cover required in BPPL SP-112.

7.0 AERIAL MARKERS

CONTRACTOR shall install aerial markers at approximate five (5) mile intervals, where designated by COMPANY, in accordance with Exhibit "119-4". Aerial markers shall be located in same general manner as milepost markers.

8.0 PIPELINE MARKERS

For underground lines, the location of each pipeline crossing shall be conspicuously identified by a line marker installed on each side of the river, highway, or railroad crossing in accordance with Exhibit "119-5". Markers shall be placed on casing vents; all PI's where feasible or special marker posts located over each pipeline at fence of property lines.

Pipeline marker signs should be sufficiently elevated above the grade to allow them to be clearly viewed from a distance and to remain visible above normal vegetation or normal snow accumulation. Two pipeline marker signs shall be attached to each post so that a sign can be seen from each direction. COMPANY shall supply pipeline marker signs.

Care must be taken that the correct signage is ordered. Natural gas pipelines must state "Gas Pipeline" and liquid pipelines must state "Petroleum", or the name of the liquid, "Pipeline".

e9.0 PERMANENT FENCE GATES

CONTRACTOR shall furnish and install permanent right-of-way fence gates where designated in accordance with Exhibit "119-6".

12.0 NAVIGABLE WATERWAY SIGNS

The Army Corps of Engineers may require a “DO NOT DREDGE OR ANCHOR” sign as shown in Exhibit 119-7 on either side of certain navigable waterways.

13.0 CARSONITE LINE MARKERS

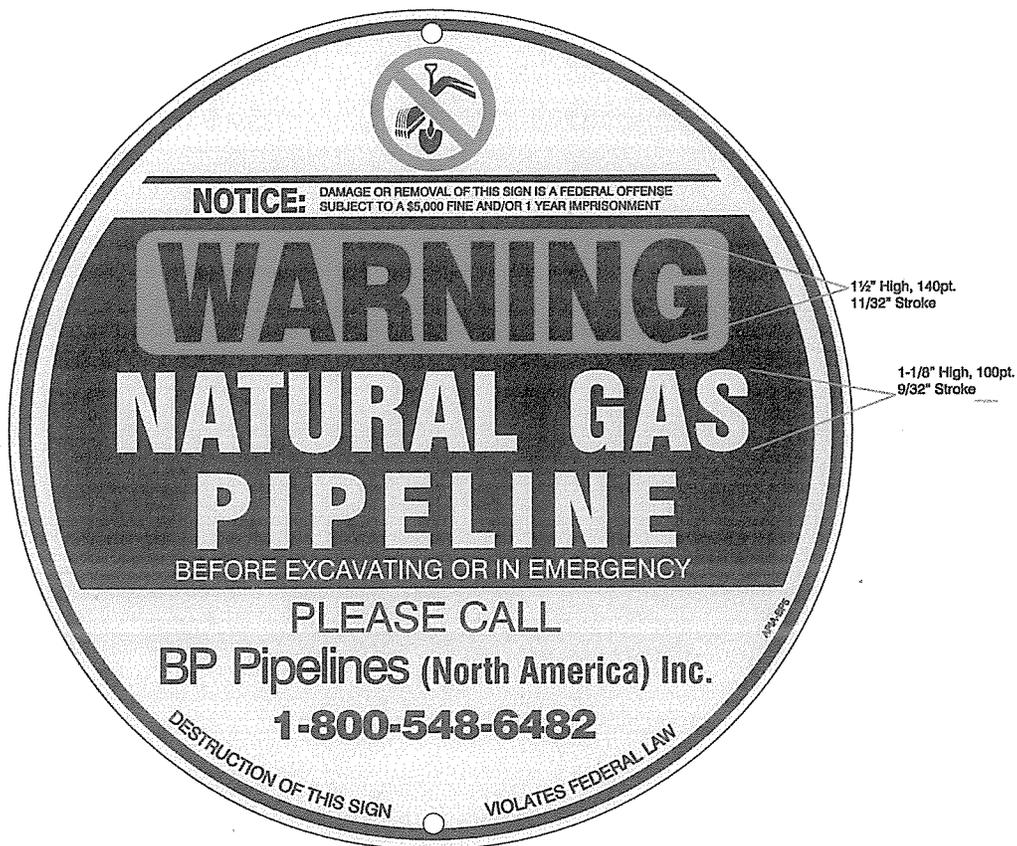
Carsonite (1-800-648-7917) flexible fiber- reinforced warning markers, 62” Long X 3.8’ Wide, dual sided, may be used for marking the lines in areas where cattle may be present or in other places where a flexible marker is desired. This marker design is shown in Exhibit 119-8, and marker signage shown on Exhibit 119-8-1.

Care must be taken that the correct signage is ordered. Natural gas pipelines must state “Gas Pipeline” and liquid pipelines must state “Petroleum”, or the name of the liquid, “Pipeline”.

14.0 ATTACHMENTS

EXHIBIT 119-1	INSULATING FLANGES AND <u>VALVES</u>
EXHIBIT 119-2-1	CORROSION CONTROL TEST STATION
EXHIBIT 119-2-2	TYPICAL TEST STATION DETAIL
EXHIBIT 119-2-3	TYPICAL TEST STATION DETAIL FOR FOREIGN LINE CROSSINGS
EXHIBIT 119-2-4	TEST STATION CASING DETAIL
EXHIBIT 119-2-5	THERMITE BRAZING
EXHIBIT 119-2-6	CADWELD MOLD
EXHIBIT 119-2-7	MASTIC CAPS
EXHIBIT 119-2-8	HOT APPLIED TAPE
EXHIBIT 119-3	TYPICAL GATE VALVE INSTALLATION
EXHIBIT 119-4	AERIAL MARKER
EXHIBIT 119-5	PIPELINE MARKER
EXHIBIT 119-6	PERMANENT RIGHT-OF-WAY FENCE GATES
EXHIBIT 119-7	“DO NOT DREDGE OR ANCHOR” SIGN
EXHIBIT 119-8	CARSONITE LINE MARKER
EXHIBIT 119-8-1	VINYL SIGNAGE FOR CARSONITE MARKER

EXHIBIT 119-5 PIPELINE MARKER
Natural Gas Pipelines



Customer	BP Pipelines	Material	ALUMINIUM	Thickness	<input type="checkbox"/>
Colors	LARGE CENTER AREA= BLACK WITH YELLOW TEXT. RED BOX WITH BLACK TEXT.				
	OTHER COPY BLACK. "NO DIG" HAS RED RING/SLASH. SHOVELS BLACK.				
Hole Sizes	5/16"	# of Holes	2	Hole Locations	HOLES 11" ON CENTER
Size	12" ROUND	<input type="checkbox"/>	Rounded Corners	<input type="checkbox"/>	Print 2 sides
Date	4/11/03	Part #	APIA-BP7	FILENAME	APIA-BP7



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 Phone: 1.800.522.4343 • Fax: 1.888.522.4343 • www.RhinoMarkers.com

BPCutSheet-APIA-BP7 2-3-12

**EXHIBIT 119-8-1 - Vinyl Signage for Carsonite Line Markers
Natural Gas Pipeline**



CUSTOMER:	BP PIPELINES (N.A.) INC.	<input type="checkbox"/>
PRODUCT:	DECAL	<input type="checkbox"/>
VINYL:	WHITE (PRINT YELLOW)	<input type="checkbox"/>
SIZE:	2-7/8" x 14"	<input type="checkbox"/>
COLORS:	"WARNING" IS BLACK AND SET AGAINST A RED BOX. CIRCLE AND SLASH IN THE "NO-DIG" SYMBOL ARE RED WITH A BLACK STROKE; THE SHOVELS ARE BLACK. ALL OTHER TEXT AND GRAPHICS ARE BLACK. ALL TEXT AND GRAPHICS ARE SET AGAINST A YELLOW BACKGROUND.	<input type="checkbox"/>
DATE:	12/22/06	<input type="checkbox"/>
PART #	SD-6913K	
FILENAME:	SD-6913K	

Rhino Marking & Protection Systems
A Division of REPNET, Inc.
280 University Dr. SW Waseca, MN 56093
800.522.4343 Fax 888.522.4343
www.RhinoMarkers.com

DESTRUCTION OF THIS SIGN VIOLATES FEDERAL LAW



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BEFORE EXCAVATING OR IN EMERGENCY PLEASE CALL BP PIPELINES (North America) Inc. 1-800-548-6482

Rhino 12/06 SD-6913K

1" High, 100pt.
9/32" Stroke



Job Plan Details

ESD1472: ESD Test - Pascagoula Compressor Station

Organization:	Priority: 1	Owner:
Site:	Interruptible?: N	Group Owner:
Type: MAINTENANCE	Supervisor:	Labor Group:
Duration: 672:00	Crew:	

Job Plan Tasks

Task ID	Description	Duration	Nested Job Plan	Meter Name	Owner	Owner Group
10	Notify all affected parties prior to performing shut in.	00:00				
20	Perform ESD Shut in from Remote Control Center to activate EV9000/ EV9001 to vent esd header--	00:00				
30	Record the Time it took for all valves to close ----->	00:00				
40	After initial test, repressure esd header and test local alternate locations listed below	00:00				
50	Test PSL 9000 on decreasing pressure 700 psig passed?----->	00:00				
60	Test / open ESD Station #1 at North/West Gate. Test passed?----- ->	00:00				
70	Test / open ESD Station #2 at East Gate. Test passed?----->	00:00				
80	Return system to normal operations	00:00				
90	Audible alarm verified?---->	00:00				
100	Visual alarm verified?	00:00				



Job Plan Details

ESD1473: ESD Test - Sandhill Compressor Station

Organization:	Priority: 1	Owner:
Site:	Interruptible?: N	Group Owner:
Type: MAINTENANCE	Supervisor:	Labor Group:
Duration: 672:00	Crew:	

Job Plan Tasks

Task ID	Description	Duration	Nested Job Plan	Meter Name	Owner	Owner Group
10	Notify all affected parties prior to performing shut in.	00:00				
20	Perform ESD Shut in from Remote Control Center to activate EV9000/ EV9001 to vent esd header-->	00:00				
30	Record the Time it took for all valves to close ----->	00:00				
40	After initial test, repressure esd header and test local alternate locations listed below	00:00				
50	Test PSL 9000 on decreasing pressure 700 psig passed?----->	00:00				
60	Test / open ESD Station #1 at West Gate. Test passed?----->	00:00				
70	Test / open ESD Station #2 at East Gate. Test passed?----->	00:00				
80	Return system to normal operations	00:00				
90	Audible alarm verified?----->	00:00				
100	Visual alarm verified?----->	00:00				

Find: Select Action
 Job Plans Work Assets Specifications

Attachments
 Job Plan: FASC1044 Gas Detector Functional Check
 Status: ACTIVE
 Template Type: Maintenance
 Range: 648.00
 Regulation: 192.736
 Job Plan Category: PM
 Job Plan Type: FASC
 Responsibility: WO Priority: 1
 Team: CTDSN
 Team Lead:
 Crew:
 Owner:
 Owner Group:

Job Plan Tasks Filter 1-7 of 7

Task	Description	Entry Indicator	Standard	Task Duration	Meter
100	Test below gas detectors for operability and note any condition change	Y		0:00	
110	Does Generator Room gas detector operate properly?-->	Y		0:00	
120	Does Compressor Building gas detector operate properly?-->	Y		0:00	
130	Does Audio Alarm function properly?-->	Y		0:00	
140	Does Visual Alarm function properly?-->	Y		0:00	
200	Do Common Low Alarms Initiate at 20%?----->	Y		0:00	
205	Do Common High Alarms Initiate at 40%?----->	Y		0:00	

Planned Labor

Labor	Materials	Services	Tools	Task	Craft	Skill Level	Labor	Quantity	Hours	Rate	Line Cost
...No rows to display...											
New Row											