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U.S. Pipelines and Logistics

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

Ms. Linda Daugherty
Director, Southern Region
U.S. Department of Transportation
Pipelines and Hazardous Materials Administration
233 Peachtree Street, Suite 600
Atlanta, GA 30303

**RE: CPF 2-2007-5002W
Tri-States NGL Pipeline Company
Operator ID 31270**

Dear Ms. Daugherty:

BP Pipelines (North America), Inc., operator for Tri-States NGL Pipeline, acknowledges receipt of your CPF-2-2007-5002W warning letter. BP would like to respond to the warning since several of these items were addressed at the time of the inspection and immediately afterward with the inspector, due to shortened inspection onsite.

BP Pipelines submits the following additional information in response to the issues raised in the warning letter. It is our belief that these responses address PHMSA concerns as described in CPF 2-2007-5002W.

If you have any questions pertaining to this matter, please contact Rob Knanishu at (630) 836-3498.

RECEIVED MAR 9 6 2007

Sincerely,

Gerald E. Schau

HSSE & Integrity Manager

Item #1) 195:404 Maps and Records

The east operating end of the Tri-State line was replaced in or around 2000-01, while it was operated by Williams. The line that was replaced, was coated with FBE (Canal Station (MS) to originating east end in Mobile, AL), and the older sections (that were not replaced during that project) are coated with coal tar enamel. Coating information was e-mailed to inspector on 11-6-06 by bp's Mark Buteau.

Item #2) 195:577 Stray current

Each year during the annual PSP (Pipe to Soil Potential) survey Tri-States personnel tests for stray current at each of the foreign pipeline crossings and also test for AC interference at power line crossings. All of this is documented on the annual PSP survey. If interference is discovered at that time, controls are put in place to mitigate the interference, such as the AC ground bed that was installed at Kenner Split. A Close Interval Survey was also done in 2006 that checked for interference. No deficiency was noted at the time of the inspection when this information was reviewed. It is assumed this item is related to the uncertainty as noted in Item #1.

Item #3) 195:575 Isolation from outside piping

This is tested on an annual basis during the PSP survey. All of the isolation flanges are tested, and any shorted flanges are reported, and documented on the PSP survey report, and a Maximo work order is written to repair any shorted flanges or piping. No deficiency was noted at the time of the inspection when this information was reviewed. It is assumed this item is related to the uncertainty as noted in Item #1.

Item #4) 195:589 Corrosion Records

There is a map in the Moss Point office that shows the location of all of the bond boxes, and rectifiers on the Tri-state system, and there is documentation in BP's computerized corrosion management system (CPDM) on the location of every rectifier, ground bed, and bond on the Tri-State system. Since the pipeline is bonded with Gulf South on this system in Alabama and Mississippi, there are no rectifiers on this system, or ground beds (in MS or Ala), but the location of each and every bond, along with mile post numbers, and location description are in the office in Moss Point. It is assumed this item is related to the uncertainty as noted in Item #1.

Item #4) 195.406 MOP:

MOP history and current summary (including calculation) was reviewed with inspector at the time of the inspection. This information was also e-mailed to inspector on 11-6-06 by Mark Buteau.