



Steve Pankhurst

President
BP Pipelines (North America) Inc.



BP Pipelines (North America) Inc.
150 W. Warrenville Road
Suite 605-3501K
Naperville, IL 60563

SENT VIA FED-EX

March 22, 2013

RECEIVED MAR 25 2013

Mr. David Barrett
Director, Central Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106

Re: CPF 3-2013-5005M

Dear Mr. Barrett:

BP Pipelines (North America) Inc. (BP) is responding to the referenced Notice of Amendment (NOA) received in our offices on February 20, 2013, regarding the Integrated Inspection conducted during August 2, 2010 through December 10, 2010 with the inspection close on January 19, 2011. BP seeks to augment the information in NOA Item 3, and is contesting NOA items 4 and 5, as described below. Finally, BP reserves the right to a hearing for items, if any, which PHMSA deems unresolved by this response.

BP is providing additional information on the following item:

NOA Item 3: BP believes the basis of this finding is not factual. The reason BP takes pre-excavation pictures at each pipeline locate request is to enhance documentation during the face-to-face meeting with the excavator; BP does not take pictures to "verify that the excavators were in the correct spot". At the time of the integrated inspection, BP's methodology to verify excavators were at the correct location prior to commencing excavation activities involved completion of the Excavator/ Locator Orientation Form. Even though this methodology was reasonable and appropriate, BP has nevertheless already implemented the Common Ground Alliance (CGA) Best Practice of taking pre-excavation pictures. BP simply wishes to correct the inspection record, and as noted has already amended its procedures.

BP contests the following two items:

NOA Item 4: BP contests this item because electronic inspection is not required as a coating inspection tool; it is simply one option that is available. BP has strengthened the

language in its procedure regarding required electronic inspections for coating repairs in excess of 45 feet in length, but for short coating replacements, BP elects to utilize visual inspection.

NOA Item 5: BP contests this item because BP believes its existing procedures for timely repair of test leads is appropriate, which is to require repair prior to the next annual survey.

BP has no additional comments on the remaining NOA items and is either in the process of amending or has already amended the noted procedures. BP requests an additional ninety (90) calendar days to provide PHMSA with amended procedures as described in the remaining NOA items, as required.

If you have any questions, please feel free to contact Dave Barnes at (630) 536-3419.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Pankhurst". The signature is written in a cursive, somewhat stylized font.

Steve Pankhurst.
President
BP Pipelines (North America) Inc.

cc: file copy