



BP Pipelines (North America) Inc.
150 W. Warrenville Road
Naperville, IL 60563

February 19, 2013

Mr. R. M. Seeley
Director, Southwest Region
Pipeline & Hazardous Materials Safety Administration
U. S. Department of Transportation
8701 South Gessner Road, Suite 1110
Houston, TX 77074



Re: CPF 4-2013-5002

Dear Mr. Seeley:

Generally, BP Pipelines (North America) Inc. (BP) does not contest the allegations contained within the Notice of Probable Violation (Notice) and Proposed Compliance Order (Proposed Order) that was received in our offices on January 18, 2013, regarding the pipeline safety inspection of BP's offshore liquid pipeline system in Houma, LA that occurred in August 2012. But the Notice and Proposed Order is, BP believes, somewhat misleading.

The Notice states that "BP Pipeline failed to properly identify the transfer point where operating responsibility transfers to a producing operator on the schematics of their offshore facilities". The Notice then references five off-shore facilities – Holstein, Mad Dog, Thunder Horse, Atlantis, and Thunder Hawk, suggesting that the schematics at all of these facilities were somehow deficient. This is not accurate. The schematics for BP's Thunder Horse and Atlantis facilities did, in fact, properly identify the applicable transfer point. So, no corrective actions are necessary for these schematics. Further, it is BP's understanding that the Thunder Hawk facility, which BP does not own, is a producer-only platform and production line; there is no transition from producer to transporter. Therefore, the Thunder Hawk platform would not be subject to DOT/PHMSA requirements.

Despite this, BP will not contest the allegation in the Notice. Rather, BP has elected to implement the corrective actions contained in the Proposed Compliance Order. This response states BP's actions, consistent with the Proposed Order, are to update drawings for the Holstein and Mad Dog facilities to clearly identify the transfer point where

operating responsibility transfers to a producing operator on the schematics of offshore facilities (pursuant to the requirements of §195.9). All actions have been completed.

The Proposed Order required BP to:

1. Amend schematics to clearly identify the transfer points. The transfer point must be clear and consistent across all applicable assets.

BP's Actions:

BP has amended the applicable schematics.

2. Proposed Compliance Order item 1 should be completed within 30 days after receipt of the Notice.

BP's Actions:

BP has completed the amendments to the applicable schematics.

3. It is requested (not mandated) that BP maintain documentation of the safety and improvement costs associated with fulfilling this Compliance Order and submit the total to R.M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies, and analysis, and 2) total cost associated with replacements, additions, and other changes to the pipeline infrastructure.

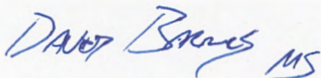
BP's Actions:

BP responds that it incurred nominal costs associated with updating the noted drawings, and there were no changes to the pipeline infrastructure.

Given BP's actions, BP does not believe that the Proposed Compliance Order is required any longer.

BP Pipelines remains committed to working cooperatively with your office with the ultimate goal of further enhancing the safety of our operations. Please feel free to contact me directly at (630-536-3419) should you have any questions pertaining to this matter, or if you would like to receive copies of the updated schematics referenced above.

Very Truly Yours,



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