



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 26, 2008

Mr. Anthony Brock
Senior Vice President
BP Exploration Alaska, Inc.
900 East Benson Boulevard
Anchorage, AK 99501

CPF 5-2008-5026W

Dear Mr. Brock:

On February 6-7, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your North Star Sales Oil Line in Prudhoe Bay, Alaska.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

1. **§195.420 Valve maintenance.**
 - (a) **Each operator shall maintain each valve that is necessary for the safe operation of its pipeline systems in good working order at all times.**
 - (b) **Each operator shall, at intervals not exceeding 7 1/2 months, but at least twice each calendar year, inspect each mainline valve to determine that it is functioning properly.**

At the time of the inspection, BPXA was unable to provide the records for mainline valve inspections during the February 2006 and March 2006 timeframe, thus missing the twice each calendar year requirement as required by the Pipeline Safety Regulations, Title 49, CFR 195.420. Although no records were provided to PHMSA for the February and March 2006 inspection periods, records were available and supplied for July 2005 and August 2005 and the subsequent inspection cycle of October 2007 and November 2007.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in BPXA being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2008-5026W**. 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).

Sincerely,



Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 R. Guisinger (#118840)