

## WARNING LETTER

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

November 4, 2015

Mr. Michael Barnes  
Vice President, BP Alaska  
BP Exploration Alaska, Inc.  
900 East Benson Boulevard  
Anchorage, Alaska 99501

**CPF 5-2015-6005W**

Dear Mr. Barnes:

From February 17 - February 25, 2015, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, inspected your Natural Gas Liquids (NGL) Pipeline located in Prudhoe Bay, Alaska.

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

**1) § 195.452 Assessment methods.**

**(j)(5)(iv) Other technology that the operator demonstrates can provide an equivalent understanding of the condition of the line pipe. An operator choosing this option must notify OPS 90 days before conducting the assessment, by sending a notice to the address or facsimile number specified in paragraph (m) of this section.**

As of the inspection, BPXA was using the original “other technology” notification submitted to PHMSA for their integrity inspection of the NGL line on the North Slope of Alaska.

Although PHMSA granted the use of “other technology” to BPXA for the original inspection of the NGL products line in 2008, BPXA must notify OPS (PHMSA) each time the technology is going to be used. This notification is required in 195.452(j)(5)(iv) Assessment methods.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a 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 5-2015-6005W** in your response. 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,

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

cc: PHP-60 Compliance Registry  
PHP-500 R. Guisinger (# 149279)