



BP Pipelines (North America) Inc.
30 S. Wacker Drive, 10th Floor
Chicago, Illinois 60606

January 27, 2020

Mr. Dustin Hubbard
Director, PHMSA Western Region
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

RE: CPF 5-2019-6011W

Dear Mr. Hubbard,

This letter is in response to the above-referenced PHMSA Warning Letter dated December 27, 2019 and received by BP Pipelines (Alaska) on January 7, 2020.

PHMSA conducted a hazardous liquids integrated inspection on BP North Slope assets in 2019 in Prudhoe Bay, Alaska. We write in response to finding 2 in the above-referenced letter regarding welded supports on the Lisburne Oil Transit Line.

For ease of response, item 2 from the Warning Letter is restated below in italics and followed by BP's response.

Warning Letter

2. ***§195.208 Welding of supports and braces.***

Supports or braces may not be welded directly to pipe that will be operated at a pressure of more than 100 p.s.i. (689 kPa) gage.

Finding:

Supports were welded directly to the Lisburne Pipeline.

There were six instances on the Lisburne pipeline where supports or braces have been welded directly to pipe which was operated at pressures greater than 100 p.s.i. gage. Two of these welds were located on piping within Module 4920, two of these welds were located on piping immediately outside of Module 4920, and two of these welds were located on piping within Module 4921. The Maximum Operating Pressure (MOP) of this system was 950 p.s.i. gage.

BP Response:

BP respectfully disagrees with this Warning Letter finding because these supports were installed in 1985 during original construction when the Lisburne pipeline was not subject to 49 CFR 195.208 or any other part of 49 CFR Part 195 because it met the definition of a low stress pipeline. Since its construction, the Lisburne pipeline has operated as a "low stress pipeline" as that term is defined by 49 CFR §195.2. Per this definition, a *low stress pipeline means a hazardous liquid pipeline that is*

operated in its entirety at a stress level of 20 percent or less of the specified minimum yield strength (SMYS) of the line pipe. The Lisburne shipping pump “dead-heads” (i.e. maximum pressure output) at a pressure that produces only 16% SMYS of the line pipe, so the operating pressures in this pipeline will never exceed a pressure that produces more than 20% SMYS of the line pipe. Therefore, these supports should be considered as “grandfathered”, as these were placed on the pipeline when pipeline safety regulations did not apply to this pipeline.

Although portions of 49 CFR 195 have become applicable to the Lisburne pipeline under the terms of the BP Consent Decree (July 2011) and then subsequently due to regulatory amendments (October 2011), 49 CFR 195 only became applicable long after the pipelines were originally placed in service. the Subpart D - Construction provision for welding of supports and braces cannot be retroactively applied to historical and pre-code construction.

These supports show no signs of defects or degradation. BP has identified the supports directly welded to the Lisburne pipeline and understands the threat associated with this type of design. The supports have been nondestructively examined for defects that could be injurious to the pipeline and no defects have been identified. The inspection reports were provided in the audit. Further, these supports are on a five-year reinspection frequency. In addition, this design is conformant with the ASME B31.3 design code that was used for the design and construction of these segments of the pipelines in 1985. These supports have been in service for over 34 years and show no defects or degradation over that time period.

Based on the above, the Lisburne pipeline is qualified for use in hazardous liquid service under 49 CFR Part 195 without having to meet the design and construction standards applicable to new hazardous liquid pipelines. Therefore, this pipeline is fully compliant with the applicable regulatory requirements.

Please contact me via email at David.Barnes@bp.com or at 630-414-5044 if you wish to discuss this matter further.

Sincerely,



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

cc: Mr. Mike Chard, PHMSA, via email
Ms. Storm Herring, BPXA, via email