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U.S. Pipelines and Logistics

BP Pipelines (North America) Inc.
150 W. Warrenville Rd
Naperville, Illinois 60563

March 22, 2013

Mr. Wayne T. Lemoi
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street NE
Suite 600
Atlanta, Georgia 30303

Re: Notice of Amendment CPF 2-2013-5001M

Dear Mr. Lemoi:

BP Pipelines (North America) Inc. is responding to the referenced Notice of Amendment dated January 29, 2013, received in our offices on February 28, 2013, associated with the June 18-22, 2012 inspection of the Tri-States NGL Pipeline, LLC (Tri-States) written Operations, Maintenance and Emergency Manual (OMER).

BP Pipelines submits for your review the modified portion of BP Procedure *P-195.402(d), Abnormal Operations*, which we believe addresses the concern raised in CPF 2-2013-5001M.

BP Pipelines reserves its right to a hearing on such amendment issues, if any, which PHMSA deems unresolved by this response.

If you have any questions, please contact me at 630-536-3419.

Sincerely,

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

Attachment

cc: file copy

PROCEDURE STEPS

A. GENERAL

Abnormal operation is an event(s) that results in exceeding an operating design limit, but is not immediately identified as an emergency.

Operating design limit is defined as exceeding the MOP of the pipeline system established by engineering; and limits of ranges of pressure, flow rate and flow temperature that define normal operation. Hazardous faults/critical alarms that result in abnormal operations will also be documented in MAXIMO as UG codes, unplanned abnormal compliance, or in affiliate equivalent system.

Explainable events caused by an upset condition on the pipeline system, which do not exceed operating design limits, are not identified as abnormal conditions. In most cases, the Pipeline Controller can clear these events. These explainable events will be documented in MAXIMO as UF codes, unplanned failure, or in affiliate equivalent system, and include all critical alarms.

In all cases, the Pipeline Controller, field personnel, and engineering, if warranted, must thoroughly analyze these events and take appropriate corrective action to prevent hazards to the public, employees, the environment, and the pipeline system. Those events potentially involving equipment failure or those, which cannot be cleared from the Control Center, will be referred to the appropriate field maintenance personnel for further investigation and resolution.

B. DETECTION, INVESTIGATION OF AND RESPONSE TO ABNORMAL OPERATIONS

1. UNINTENDED VALVE CLOSURE

a. Indications of unintended/unexplained valve closures may include one or more of the following:

   i. The SCADA (Supervisory Control and Data Acquisition) system alarm indicates a previously open valve has closed indicated by status change or an un-commanded alarm.

   ii. Flow near the suspected valve drops to zero.

   iii. Pressure upstream of the suspected valve increases sharply.

b. **Pipeline Controller Responsibilities:**

   i. Shut down the line or system immediately to prevent an over-pressure situation.

   ii. Determine if the facility involved has any other failures (e.g., electrical or mechanical alarms, high receiving tank alarm, etc.).

   iii. Contact appropriate maintenance personnel to investigate and correct the problem and document the event by creating a MAXIMO Work Request using Job Plan UG 1976, or Affiliate equivalent form or maintenance management tool record, for the field maintenance personnel to record their response and closure to the event.

   iv. Once the cause of the unintended valve closure is determined and corrected, field personnel will confirm that it is safe to restart the pipeline. The controller can then re-open the valve and restart the line.

2. UNINTENDED STATION SHUTDOWNS

a. Unintended station shutdowns can be caused by any number of factors including low suction or high case/ discharge pressures, power failures (even those of very short duration), or the operation of any safety device. See Section B.5 for more details concerning the operation of a safety device.

b. **Pipeline Controller Responsibilities:**

i. Determine the cause of the shutdown..

ii. Verify the other station(s) on the system are operating normally and make the necessary adjustments to the pipeline.

iii. If the station shutdown is caused by the operation of a safety device, refer to Section B.5. If the fault is re-settable, reset (clear) the station fault if it is safe to do so.

iv. If the fault condition cannot be cleared, contact appropriate maintenance personnel to investigate and correct the problem and document the event by creating a Work Request for the field maintenance personnel to record their response and closure to the event.

v. The station can be re-started after the cause(s) of station shutdown is determined, corrected, and the Pipeline Controller has verified it is safe to do so.