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10-21-10 10:34 AM

U.S. Pipelines and Logistics

BP Pipelines (North America) Inc.
28100 Torch Parkway
Warrenville, Illinois 60555

October 20, 2010

Mr. Chris Hoidal, P.E.
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

Re: Notice of Amendment CPF 5-2010-0015M

Dear Mr. Hoidal:

This letter is in response to Department of Transportation (DOT) Pipeline Hazardous Materials (PHMSA's) Notice of Amendment CPF 5-2010-0015M dated September 21, 2010.

On July 27-29, 2010, a representative of the Pipeline Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected BP Exploration Alaska's (BPXA) procedures for the Badami Natural Gas Transmission Pipeline in Prudhoe Bay, Alaska.

For ease of response, the code citation and DOT's statements to BPXA have been copied below in italics and are followed by BPXA's response.

§192.605 Procedural manual for operations, maintenance, and emergencies

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. (3) Making construction records, maps, and operating history available to appropriate operating personnel.

A. DOT Statement:

The Pipeline alignment Sheet (G 254) indicated that the pipe wall thickness was .432 inches for the entire pipeline. The Badami Pipeline Site Specific DOT Operations, Maintenance, Emergency Response (OMER) Manual lists the belowground river crossings (Kadleroshilih, Shaviovik, and Sagavanirkok river crossings) as .432 wall thickness and rest of the pipeline as .375 wall thickness. During the field inspection, pipe was found marked .432 wall thickness at the cased crossing at Badami, and .375 along the causeway. The alignment sheets need to indicate the actual wall thickness of the pipeline.

BPXA Response:

The official record is not the G-254 alignment sheet which should be regarded as a document in development. The pipeline P&IDs are the official record. According to the P&IDs, the pipeline wall thickness is .432 at all river crossings and various road crossings. The P&ID also indicates that the wall thickness of all cross-country pipe and causeway crossings is .375. However, we do recognize the need to update working copies as soon as possible and the alignment sheets have been updated per the DOT audit finding. Please see the P&IDs, Attachment A, and the revised G-254 Alignment Sheet, Attachment B.

B.1 DOT Statement:

The Operator's Badami Natural Gas pipeline, DOT Operation, Maintenance, Emergency Response Manual (OMER) was found in need of updating as follows:

1. *Page 5, "Physical Description" indicate that the Technical Specifications are found in Appendix F (they are found in Appendix A), DOT equipment are found in Appendix G (they are found in Appendix B) and DOT boundaries are in appendix H (They are in Appendix C).*

BPXA Response:

The Operator's Badami Natural Gas pipeline, DOT Operation, Maintenance Emergency Response Manual (OMER) has been updated to reflect the appendices accurately. Please see Attachment C.

B.2 DOT Statement:

The Operator's Badami Natural Gas pipeline, DOT Operation, Maintenance, Emergency Response Manual (OMER) was found in need of updating as follows:

2. *Page 27, Appendix A, Technical Specifications indicate that the valves are rated ANSI 600#. This is not consistent with the MAOP or the flange rating.*

BPXA Response:

Appendix A, Technical Specifications valve rating has been updated to accurately reflect the correct ANSI rating which is ANSI 1500#. Please see Attachment D.

BPXA believes that the practices and actions taken as described in the response herein address the issues identified in the Notice of Amendment.

If you have any questions, please contact me at 630-836-3435 or Glen Pomeroy at 907- 564-5921.

Sincerely,



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

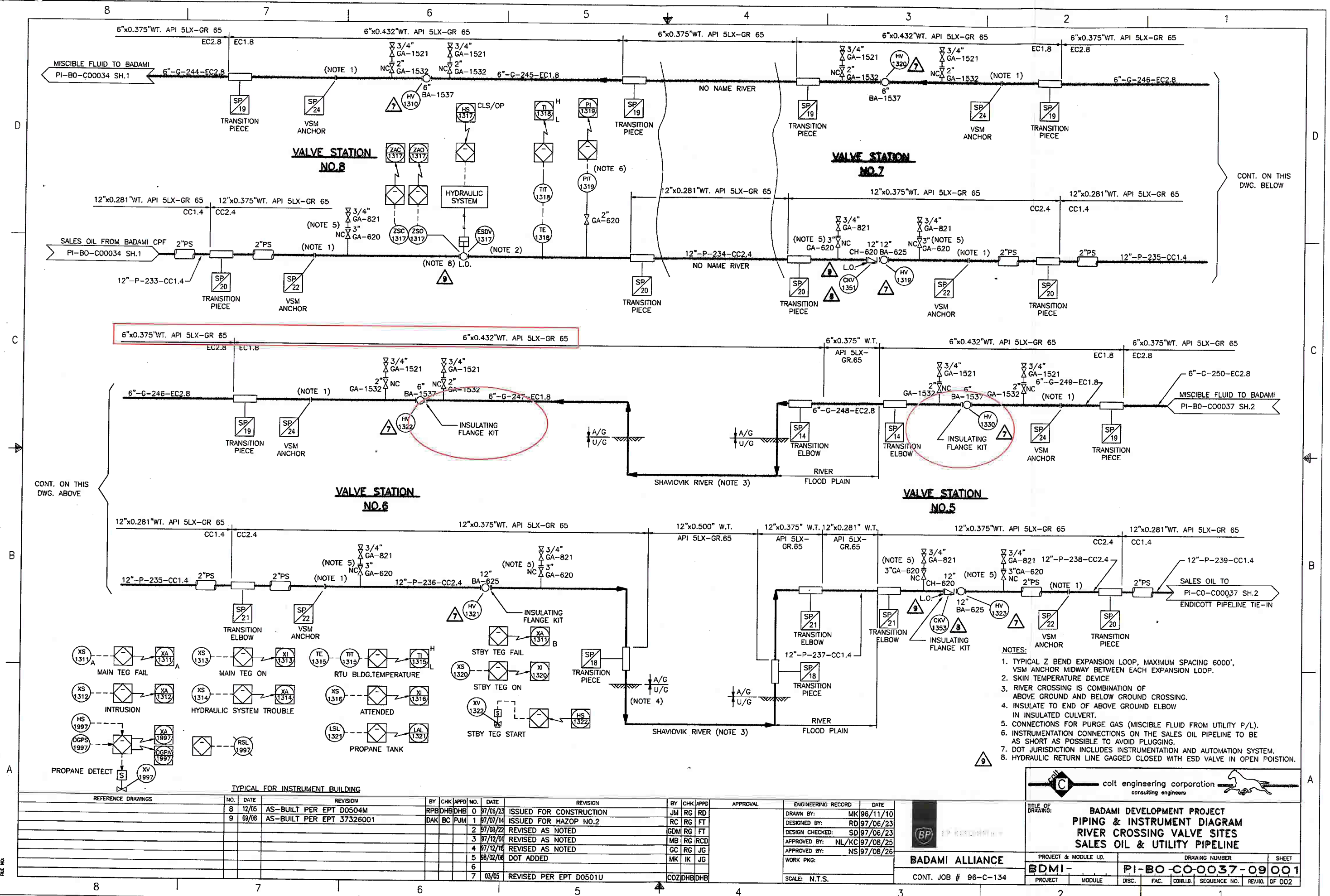
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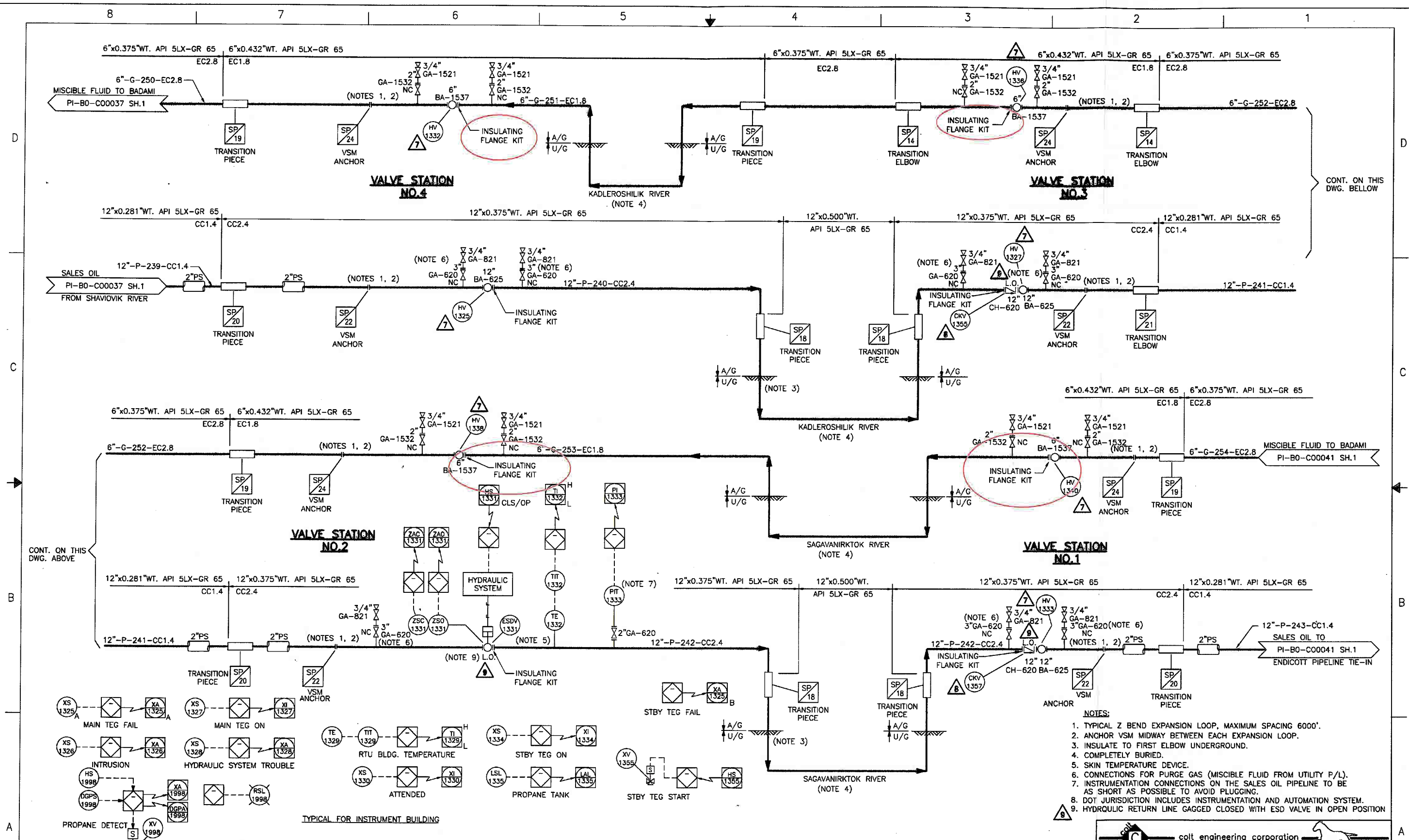
Greg Mattson, HSSE & Engineering VP
Bruce Williams, VP Operations
Don Turner, Pipelines Delivery Advisor
Dennis Hinnah, DOT PHMSA Alaska
Bill Flanders, DOT PHMSA Alaska
Truman Dickeson, BP Pipelines North America
Glen Pomeroy, BPXA Pipeline TA

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Attachment A

Badami Gas/Liquids P&IDs



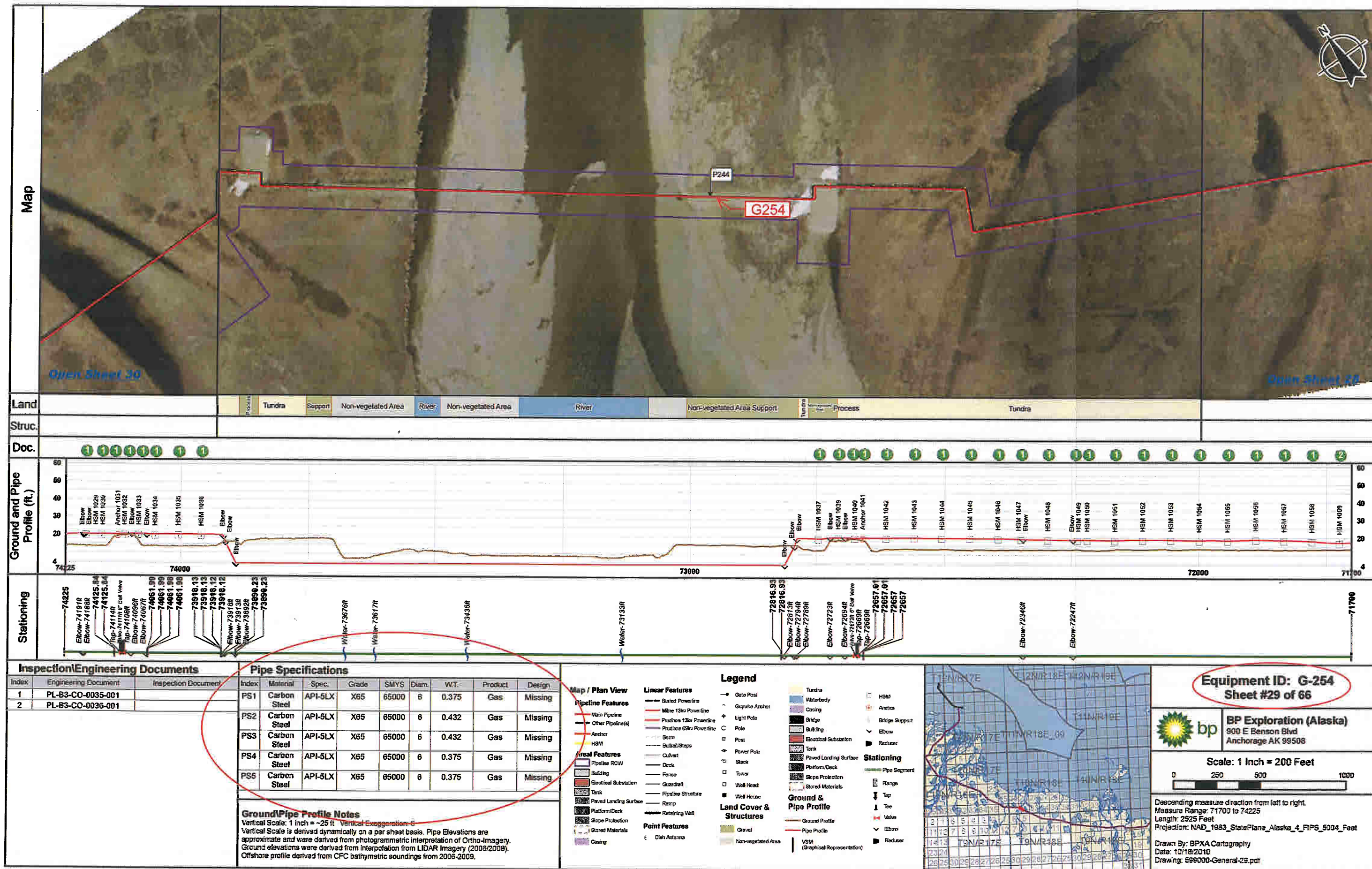


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Attachment B

Updated Version of Badami Gas Line Alignment Sheet



Attachment C

Updated Version of Badami Gas OMER, Page 5



1. 49 CFR 192 - GENERAL

1.0 Purpose

BPXA's U.S. Department of Transportation (DOT) Pipeline Operation, Maintenance, and Emergency Response Manual (OMER) describes and/or points to procedures for maintenance activities as required by [49 CFR 192.605](#). While this manual cannot cover every conceivable situation, it serves as a guideline. Questionable items should be reviewed with your supervisor and/or the ACT Regulatory Compliance Coordinator and/or the BPXA DOT Pipeline Advisor.

1.1 Scope ([49 CFR 192.1](#))

The Badami Utility (Fuel Gas) Pipeline is under the requirements of 49 CFR 192.

1.2 Physical Description

As of October 2007 this line was returned to IDLE status. Pipeline was nitrogen purged and blinded. This line was also idled between 2003 and 2005.

The Badami Utility Gas Pipeline is a 6-inch diameter, high pressure pipeline with 0.375" wall thickness of aboveground portions and 0.432" wall thickness of buried portions at river crossings. The pipeline runs over 30 miles and was designed to transport Miscible Injectant from the SDI Y at Endicott to the Badami processing facility. Badami was restarted in September 2005 and this gas utility pipeline supplied fuel gas for start-up.

The line is mostly aboveground and un-insulated, except at the 3 buried river crossings. The pipeline is painted, on shoes and installed five feet above the tundra. It is above ground (supported on VSMS) except for the underground river crossings between the Endicott tie-in and Badami processing facility. Provisions have been incorporated into the design for thermal expansion, animal migration and vehicle movement across the pipeline route.

Badami technical specifications are listed in [Appendix A](#), the DOT equipment necessary for the safe operation of the pipeline in [Appendix B](#), and the Gas DOT pipeline boundaries in the flow chart in [Appendix C](#).

1.3 General Safety Requirements

BPXA safety requirements, outlined in the [Alaska Safety Handbook](#), must be adhered to when working with the DOT Pipelines. The Material Safety Data Sheets for natural gas and other hazardous materials can be found on BPXA's MSDS Online at

- <http://alaska.bpweb.bp.com/hsea/default.asp>
- Select **BADAMI MSDS LEDGER** then
- **SEARCH**
 - **ADVANCED SEARCH** type in **Natural Gas**
 - Click **Search**
 - BP Product code 343352

1.4 DOT Incidents ([49 CFR 191.15](#))

An incident means if any of the following criteria are met or anticipated:

- An event that involves a release gas from a pipeline
- A death, or personal injury necessitating in-patient hospitalization
- Estimated property damage, including cost of gas lost, of the operator or others, or both of \$50,000 or more.
- Other events, in the judgment of the operator that were significant even though it does not meet the above criteria.

1.4.1 Telephonic Reports

Within 2 hours of discovery (i.e. - SCADA indications or report from pipeline patrol, employees, or the public regardless of origin/ownership of the system and/or company involved) of a release of transported natural gas, the operator of the system shall give notice to the National Response Center (NRC) at 800-424-8802 or direct dial 202-267-2675 and report the following:

- 1) Names of operator and person making report and their phone numbers,
- 2) Location of the incident,
- 3) Time of the incident,
- 4) Number of fatalities and personal injuries, if any, and

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Attachment D

Updated Version of Badami Gas OMER, Appendix A



APPENDIX A – BADAMI TECHNICAL SPECIFICATIONS

Pressure	
Design	3235 psig
MAOP	3235 psig
SYMS	> 40%
Design Flow Rate (production estimate)	Provides fuel gas as needed
Pipeline Volume	31,150 ft ³
Design Code	B31.8
Badami Specification #	EC2.8
Corrosion Allowance	
External Corrosion Coating	painted
Insulation Thickness	N/A
Insulation Thermal Conductivity	N/A
External Coating	Un-insulated
Valve Rating	ANSI 1500#
Length	
Length per Joint	40 ft.
Size	
Outside Diameter	6.625"
Wall Thickness	0.432" (river crossing); 0.375" (aboveground)
Material:	API 5LX
Material Grade	GR 65
Bend Radius:	5D
Seam	ERW
Unit Weight (air)	28.57 lb/ft
Flange Rating:	ANSI 1500 #
Pressure Test:	4625 psig
Date of Construction:	1998
Overpressure Devices:	None