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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 5-2010-5024M

Dear Mr. Hoidal:

This letter is in response to Department of Transportation (DOT) Pipeline Hazardous Materials (PHMSA's) Notice of Amendment CPF 5-2010-5024M 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 Sales Oil 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.

1. ***§ 195.589 What corrosion control information do I have to maintain?***
 - (a) ***You must maintain current records or maps to show the location of —***
 - (1) ***Cathodically protected pipelines;***
 - (2) ***Cathodic protection facilities, including galvanic anodes, installed after January 28, 2002; and***
 - (3) ***Neighboring structures bonded to cathodic protection systems.***

DOT Statement:

The Operator's maps and records did not indicate locations of all the insulation flanges.

BPXA Response:

Badami Oil Pipeline's P&IDs have been walked down and the location of all insulation flanges have been verified in the field. Please see Attachment A.

2. ***§ 195.404(a)(4) Maps and records.***
 - (a) ***Each operator shall maintain current maps and records of its pipeline systems that include at least the following information:***
 - (4) ***The diameter, grade, type, and nominal wall thickness of all pipe.***

DOT Statement:

The Pipeline alignment sheets (P244) indicated that the pipe wall thickness was .281 inches on sheet 29, 46, and 47 (below ground river crossings). These should indicate the correct wall thickness.

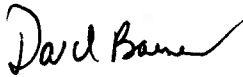
BPXA Response:

The official record is not the P244 alignment sheet which should be regarded as a document in development. The Pipeline P&IDs are the official record. According to the P&IDs, above ground pipeline is .281 wall thickness and buried pipeline is .500 wall thickness. 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 in Attachment A and the revised P244 alignment sheets in Attachment B.

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.

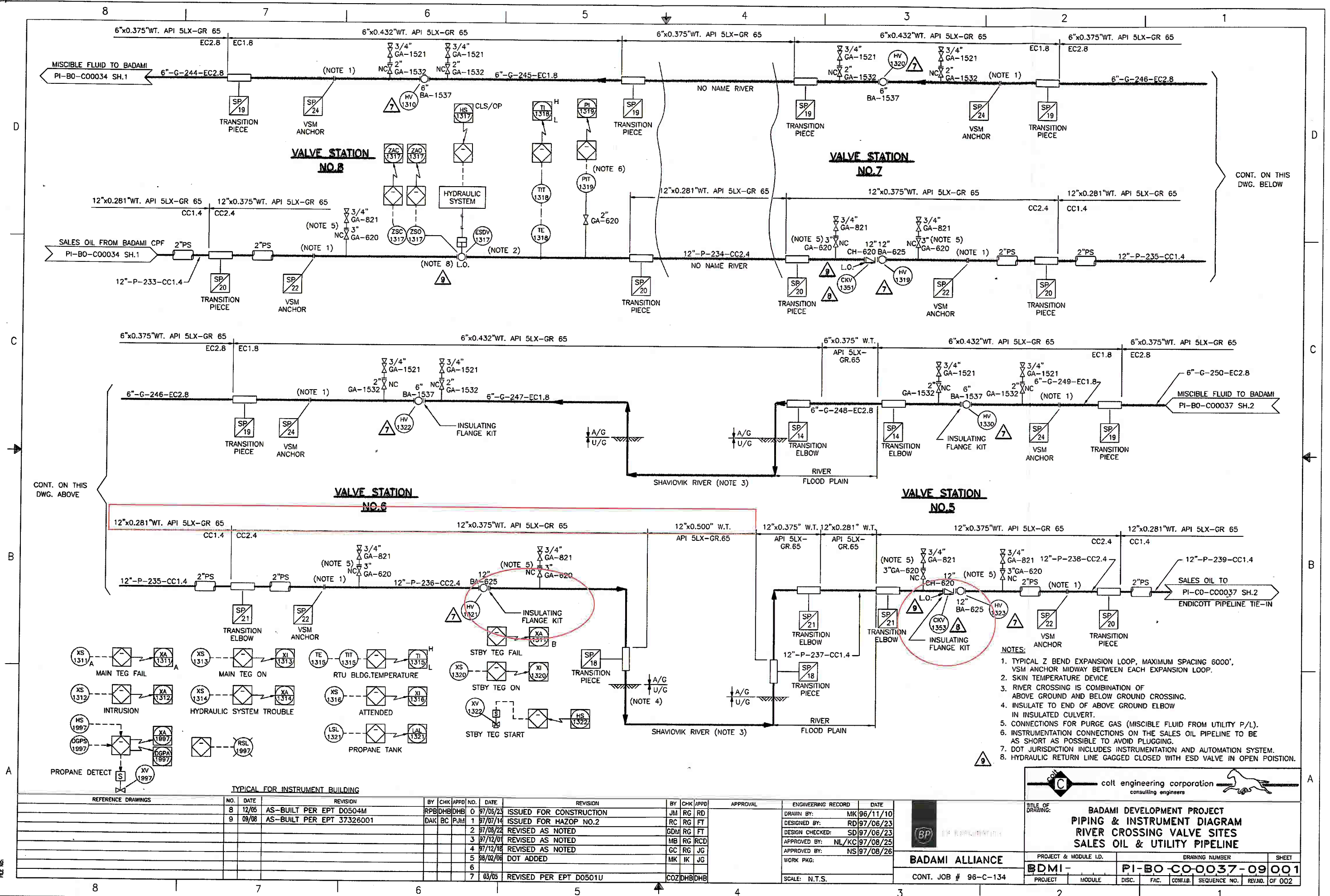
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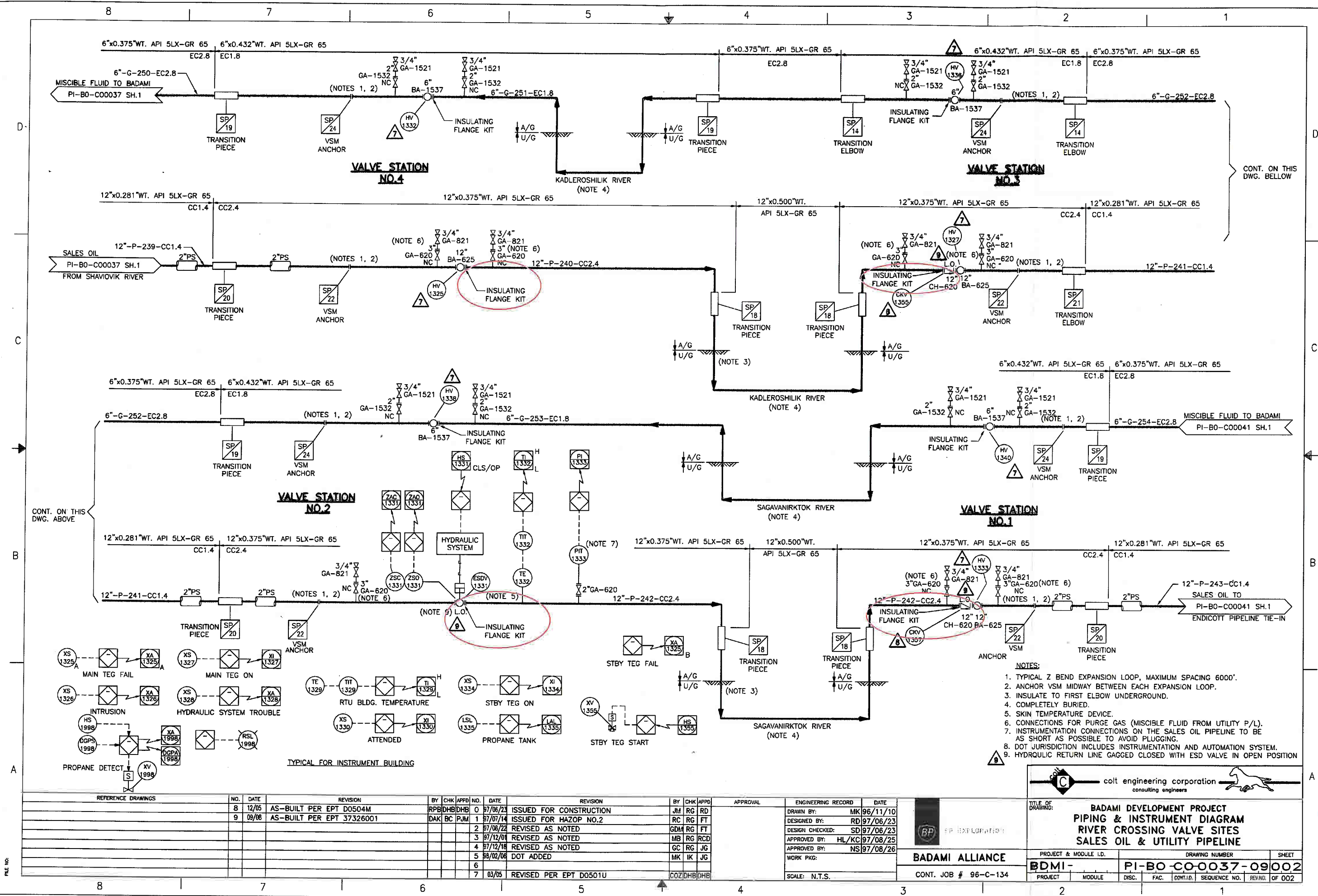
Greg Mattson, HSSE & Engineering VP
Bruce Williams, VP Operations
Don Turner, Pipelines Delivery Advisor
Dennis Hinnah, DOT PHMSA Alaska
Bill Flanders, DOT PHMSA Alaska
Truman Dickeson, BP Pipelines North America
Glen Pomeroy, BPXA Pipeline TA

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Attachment A

Badami Liquids/Gas P&IDs





Attachment B

Updated Version of Badami Liquids Line Alignment Sheets

