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STATE OF WA
UTIL. AND TRANSPORTATION
COMMISSION



U.S. Pipelines and Logistics

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

CERTIFIED MAIL

January 18, 2013

Mr. David Lykken
Pipeline Safety Director
State of Washington
Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

Re: 2012 Natural Gas Standard Inspection - Arco Western Gas Pipeline Company

Dear Mr. Lykken:

BP Pipelines (North America) Inc. is writing in response to the referenced correspondence issued by WUTC on December 21, 2012. BP Pipelines offers the following responses to the concerns noted in this document. It is our belief that the identified observations have been fully addressed. For the sake of clarity, we have restated below the concerns as set forth in the WUTC correspondence with the associated BP response.

NOTED AREAS OF CONCERN OR FIELD OBSERVATIONS

1. WAC 480-93-110 Corrosion control

(3) Cathodic protection equipment and instrumentation must be maintained, tested for accuracy, calibrated, and operated in accordance with the manufacturer's recommendations. When there are no manufacturer's recommendations, then instruments must be tested for accuracy at an appropriate schedule determined by the gas pipeline company.

WUTC Finding:

WAC 480-93-110(3) requires operators to test and calibrate their cathodic protection instrumentation to ensure the readings obtained are accurate and precise. However, the operator could not readily produce records showing the cathodic protection test equipment used for compliance monitoring had been tested and calibrated for the years 2010 and 2011. The operator stated these records were available but not at the time of the

inspection. The operator did produce the records approximately 2 weeks after the inspection. These records should be more readily available to operations personnel.

BP Response:

The verification of calibration of cathodic protection test equipment will continue to be performed annually in accordance with manufacturer recommendations.

Work orders will be created in our work management system (Maximo) starting in 2013 to ensure that the calibration of company owned equipment is performed and documented in the proper timeframe. Support documentation will be retained by the appropriate team leader.

The calibration of third party service provider equipment will be required by the appropriate corrosion specialist and verified prior to the onset of work. Calibration records will be retained by the appropriate corrosion specialist.

2. WAC 480-93-188 Gas leak surveys

(2) Each gas pipeline company must maintain, test for accuracy, calibrate and operate gas detection instruments in accordance with the manufacturer's recommendations. If there are no written manufacturer's recommendations or schedules, then the gas pipeline company must test such instruments for accuracy at least monthly, but not to exceed forty-five days between testing, and at least twelve times per year. The gas pipeline company must recalibrate or remove from service any such instrument that does not meet applicable tolerances. Records of accuracy checks, calibration and other maintenance performed must be maintained for five years.

WUTC Finding:

WAC 480-93-188(2) requires the operator to maintain records of calibration checks done on the leak detection equipment. The operator could not readily produce records showing the leak detection equipment was calibrated per the manufacturer's recommendation or monthly as required. The operator stated they did calibrate the machine prior to use and that the particular machine the operator uses (Southern Cross Hawk 46) permanently stores calibration data. They also stated this data can be downloaded; however, the operator was unsure how to accomplish this. During the exit interview, the operator stated they were working on a solution. Approximately two weeks after the exit interview, the operator did submit a draft of new process they are implementing to fulfil this requirement.

BP Response

The verification of calibration of leak detection equipment will be performed on a monthly basis in accordance with manufacturer recommendations.

Work orders will be created in our work management system (Maximo) starting in 2013 to ensure that the calibration of each leak detection device is performed and documented in the proper timeframe. Additional calibration support documentation will be retained by the appropriate team leader.

3. WAC 480-93-188 Gas leak surveys

(5) Each gas pipeline company must keep leak survey records for a minimum of five years. At a minimum, survey records must contain the following information:

- a. Description of the system and area surveyed (including maps and leak survey logs);*
- b. Survey results;*
- c. Survey method;*
- d. Name of the person who performed the survey;*
- e. Survey dates; and*
- f. Instrument tracking or identification number.*

WUTC Finding:

WAC 480-93-188(5) requires the operator to record which particular piece of equipment was used during leak surveys. The operator did not record this information as the operator only uses one piece of leak detection equipment, the Hawk 46. However, the operator did state they were going to obtain another leak detector in 2013 and as such, this information must be recorded. During the exit interview, the operator stated they were working on a solution~ Approximately two weeks after the exit interview, the operator did submit a draft of new process they are implementing to fulfill this requirement.

BP Response

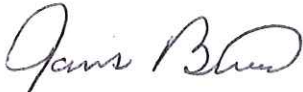
Required leak survey activities will continue to be tracked in our work management system (Maximo) to ensure timely completion. A leak survey history log, see Attachment 1, has been created to more efficiently document the associated leak survey record details required by WAC 480-93-188(5). The leak survey log will be updated upon completion of each gas leak survey. The leak survey log will be retained by the appropriate team leader.

BP Response to WUTC - Arco Western Gas Pipeline Standard Inspection
January 18, 2013

BP Pipelines remains committed to working cooperatively with your office with the ultimate goal of further enhancing the safety of our operations. Please feel free to contact me if you have any questions or further concerns.

Thank you very much for your assistance. If you have any questions, please contact me at (630) 536-3419.

Sincerely,



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

cc: Steve Pankhurst, BP
Tyrone Mitchell, BP

