

# Form A- Annual Review 8591

UTC Standard Annual Review Inspection Report  
Intrastate Operators  
FORM A: Annual Review

## Inspector and Operator Information

Inspection ID	Inspection Link	Inspector - Lead	Inspector - Assist
8591	8591	Dennis Ritter	
Operator	Unit	Records Location - City & State	
Ferndale Pipeline System	Ferndale Pipeline System	TEAMS Virtual Inspection	
Inspection Start Date	Inspection Exit Interview Date	Engineer Submit Date	
12-04-2023	12-04-2023	12-19-2023	

## Inspection Summary

You must include the following in your inspection summary:

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

### Inspection Scope and Summary

This is an annual review of Ferndale Pipeline to glean information on any changes to pipeline safety programs or integrity programs which the UTC would be interested in. There have been no significant changes to Ferndale's programs (note Ferndale Pipeline is part of BP Pipeline NA and the pipeline safety programs apply company wide).

### Facilities visited and Total AFOD

1 AFOD

### Summary of Significant Findings

*(DO NOT Discuss Enforcement options)*

There are no findings from the review.

### Primary Operator contacts and/or participants

Jim Bruen,  
Jim Fraley

### Operator executive contact and mailing address for any official correspondence

Gerald Maret

VP, US Pipelines & Logistics

British Petroleum - North America

M. C. 95 305 Wacker Drive

Chicago Illinois 60606  
[gerald.maret@bp.com](mailto:gerald.maret@bp.com)

## Instructions and Ratings Definitions

### INSPECTION RESULTS: Annual Review

Satisfactory Responses

15

Satisfactory List

1,3,8,9,10,14,17,25,26,27,28,29,30,31,37,

Number of Unanswered Questions

0

Unanswered List

Unsatisfactory Responses

0

Unsatisfactory List

**Area of Concern Responses**  
1

**Area of Concern List**  
24,

**Not Applicable Responses**  
24

**Not Applicable List**  
4,5,6,7,11,12,13,15,16,18,19,20,21,22,23,32,35,38,39,40,41,42,43,44

**Yes Responses**  
2

**Yes List**  
34,36,

**No Responses**  
0

**No List**

**Not Checked / Evaluated Responses**  
0

**Not Checked / Evaluated List**

**\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.**

## ANNUAL REPORT: ACCURACY/TRENDS

**Question #1.**

**1. Result**

Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.

Satisfactory

**1. Notes**

MCA mileage in Section Q 2.9 miles did not agree with Part B mileage of 4 miles. BP indicated this was due to total 192.710 mileage included Class location mileage.

BP is an interstate operator and they typically do not provide thier manuals but rather allow access to them via a webbased review or in-person.

QB contacts are up to date.

## DAMAGE PREVENTION

**Question #2.**

Review the following damage prevention items:

**Q2. Is the damage prevention information in the annual report complete?**

Yes Part M, no damages

**Q2.b. Is the annual report damages root cause information complete and accurate?**

no damage

**Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?**

no damage

**Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?**

no damage

**Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?**

yes USPI-OPS 464-010 SOP Assigned BP Representatives Responsible for Ground Disburtance Activity, last reviwie 7/28/22

**Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?**

N/A

**Q2.g. What is the number of damages resulting from mismarks?**

N/A no damages

**Q2.h. What is the number of damages resulting from not locating within the time requirements?**

N/A no damages

**Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?**

N/A no damages

**Q2.j. Are mapping corrections timely and according to written procedures?**

N/A no mapping corrections

**Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?**

N/A no damages

**Q2.L. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?**

N/A no damage

**2. Notes**

BP has had no damages on their line since the last inspection.

## NPMS SUBMISSIONS/CHANGES

**Question #3.**

**3. Result**

Satisfactory

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

### 3. Notes

No changes to mapping submitted 2/6/23 to NPMS. Looked at email record.

## INCIDENT/SRC/AOC REPORTS REVIEW

### Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

**4. Results**  
Not  
Applicable

### 4. Notes

N/A no federal reportables, no incidents

### Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

**5. Result**  
Not  
Applicable

### 5. Notes

No damages so no reviews.

### Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**6. Result**  
Not  
Applicable

### 6. Notes

No incidents.

### Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**7. Result**  
Not  
Applicable

### 7. Notes

No SRCs

### Question #8.

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Result**  
Satisfactory

### 8. Notes

AOCs

Total of 6-2 power failures, 2 comm failure, 2 pressure related-1 related to maintenance, one was a new piece of equipment installed (orifice plate at Intalco for lower flows). Comms-network switch failure and one Raven issue had to cycle and restart. Intalco related due to low flows.

## O&M & EMERGENCY PROGRAMS

### Question #9.

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint  
**9. Result**  
Satisfactory

### 9. Notes

Yes, last reviewed 4/11-13/23 (gas OMER book 1) Note Ferndale line is only gas line in BP's pipeline system. No significant changes to manual.

### Question #10.

If changes to the O&M were made, are changes acceptable?

**10. Result**  
Satisfactory

### 10. Notes

Many smaller changes noted in Section 5 Appendices of the OMER book 1.

### Question #11.

Were emergency plans changed during the previous year?

### 11. Result

Not Applicable

**11. Notes**

No changes on the Ferndale gas side of the emergency plans.

**Question #12.**

Were any changes to emergency plans satisfactory?

**12. Result**

Not Applicable

**12. Notes**

No changes

## INTEGRITY MANAGEMENT PROGRAMS

**Question #13**

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

**13. Result**  
Not  
Applicable

**13. Notes**

N/A No substantive changes to IMP. No changes to execution of plan.

**Question #14.**

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

**14. Result**  
Satisfactory

**14. Notes**

December 16, 2022 last review.

**Question #15**

Are IMP program changes acceptable?

**15. Result**  
Not  
Applicable

**15. Notes**

No substantive changes to plan.

**Question #16**

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

**16. Results**  
Not  
Applicable

**16. Notes**

No assessment/repair work. Last tool run on 16" was 2019 and 8" 2020. On a 7 year cycle.

**Question #17**

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

**17. Results**  
Satisfactory

**17. Notes**

Reviewed HCA mapping showing MCAs, HCAs, Class location from BP Cherry Pt to Sumas

**Question #18**

What assessment work is planned for the upcoming year?

**18. Results**  
Not  
Applicable

**18. Notes**

Next assessment is on 16" in 2026.

**Question #19**

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

**19. Results**  
Not  
Applicable

**19. Notes**

No low pressure

**Question #20**

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

**20. Results**  
Not  
Applicable

**20. Notes**

Not an LDC no low pressure systems

**Question #21**

**21. Results**

<p>Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?</p> <p><b>21. Notes</b> Not an LDC no plastic pipe.</p> <p><b>Question #22</b> Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)</p> <p><b>22. Notes</b> Not an LDC, no DIMP.</p> <p><b>Question #23</b> What DIMP remediation work is anticipated for upcoming year?</p> <p><b>23. Notes</b> Not an LDC, no DIMP.</p>	<p>Not Applicable</p> <p><b>22. Results</b> Not Applicable</p> <p><b>23. Results</b> Not Applicable</p>
--	---

## ▼ OQ PROGRAM

---

<p><b>Question #24</b> Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.</p> <p><b>24. Notes</b> Last reviewed Dec 14, 2022. 3 year effectiveness review conducted. Results were</p> <p><b>Question #25</b> Are the OQ plan updates satisfactory?</p> <p><b>25. Notes</b> Minor updates. Plan was inspected 12/23. No issues.</p> <p><b>Question #26</b> Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?</p> <p><b>26. Notes</b> Reviewed Charles Groves O&amp;M Operator and Kevin Washington's (E&amp;M1) OQ records. All were re-qualified as appropriate. Only two techs on Ferndale Gas line.</p>	<p><b>24. Results</b> Area of Concern</p> <p><b>25. Results</b> Satisfactory</p> <p><b>26. Results</b> Satisfactory</p>
---	---

## ▼ PUBLIC AWARENESS PROGRAM

---

<p><b>Question #27</b> Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?</p> <p><b>27. Notes</b> Last review on 2/10/23. Note this plan covers ALL BP assets in north america. No real substantive changes. Last effectiveness review was finalized in November 2022 (note this was covered in the 2023 II mainline inspection for OPL.</p> <p><b>Question #28</b> Are changes to the PA program satisfactory?</p> <p><b>28. Notes</b> Minor plan changes. Effectiveness review findings are just now being implemented for 2023. No real gaps but opportunities to improve.</p>	<p><b>27. Results</b> Satisfactory</p> <p><b>28. Results</b> Satisfactory</p>
--	---

## ▼ CONTROL ROOM PROGRAM

---

<p><b>Question #29</b> Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?</p> <p><b>29. Notes</b> Last review of CRM Plan was April 2023. Last inspection was conducted by PHMSA in 2020. Long list of findings. PHMSA was working with BP on manual amendments. PHMSA is still not completed with finalizing the inspection. Many of the findings have already been incorporated into the plan based on conversations with PHMSA and BP.</p>	<p><b>29. Results</b> Satisfactory</p>
---	--

**Question #30**

Are the CRM program changes satisfactory?

**30. Results**

Satisfactory

**30. Notes**

Last review of CRM Plan was April 2023. Last inspection was conducted by PHMSA in 2020. Long list of findings. PHMSA was working with BP on manual amendments. PHMSA is still not completed with finalizing the inspection. Many of the findings have already been incorporated into the plan based on conversations with PHMSA and BP.

## SAFETY MANAGEMENT SYSTEM API 1173

**Question #31**

Is the operator developing and implementing an API 1173 Safety Management System?

**31. Results**

Satisfactory

**31. Notes**

BP has their own safety management system-OMS. Been in place for many years. Each local facility has their own LOMS. BP has incorporated API 1173 into as Appendix 5. External review of BP's OMS was conducted in light of 1173. BP is filling minor gaps found as a result.

## INSPECTOR ASSESSMENT OF INSPECTION UNITS

**Question #32**

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

**32. Results**

Not Applicable

**32. Notes**

only one unit and is acceptable in size

## OPERATOR'S PUBLIC WEB PAGE

**Question #33**

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

**33. Results****33. Notes**

## ADVISORY BULLETIN REVIEW

**Question #34**

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

**ADB 2019-01**

ADB 2019-01 Flood Mitigation

**34. Results**

YES

**34. Notes**

BP has incorporated this ADB into their procedures Continuing Surveillance P-192.613 Section II. However, no river crossings exist which meet criteria.

**Question #35**

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

**ADB 2019-01**

ADB 2019-01: Flood Mitigation

**35. Results**

Not Applicable

**35. Notes**

BP has incorporated this ADB into their procedures Continuing Surveillance P-192.613 Section II. However, no river crossings exist which meet criteria.

**Question #36**

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

**ADB 2019-02**

ADB 2019-02: Earth Movement/Geological Hazards

**36. Results**

YES

**36. Notes**

Continuing Surveillance P-192.613

OMER 2 Revised 9/19/23 Ferndale Gas Line. Section L. Earthquake

### Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

#### ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

**37. Results**  
Satisfactory

#### 37. Notes

Incorporated into procedure as noted above.

### Question #38

Does the operator have any indoor meter sets or regulators in their system?

#### ADB 2020-01

ADB 2020-01 Inside Meter Sets

**38. Results**  
Not  
Applicable

#### 38. Notes

No indoor meters (not and LDC)

### Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

#### ADB 2020-01

ADB 2020-01 Inside Meter Sets

**39. Results**  
Not  
Applicable

#### 39. Notes

No indoor meters

### Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

#### ADB 2020-01

ADB 2020-01 Inside Meter Sets

**40. Results**  
Not  
Applicable

#### 40. Notes

Not an LDC no indoor meters.

### Question #41

Does the operator have any low pressure systems?

#### ADB 2020-02

ADB 2020-02 Low Pressure Systems

**41. Results**  
Not  
Applicable

#### 41. Notes

Not an LDC

### Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

#### ADB 2020-02

ADB 2020-02 Low Pressure Systems

**42. Results**  
Not  
Applicable

#### 42. Notes

Not an LDC

### Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**43. Results**

Not  
Applicable

**43. Notes**

Not an LDC

**Question #44**

Does the operator include all low-pressure system risks in their DIMP program appropriately?

**ADB 2020-02**

ADB 2020-02 Low Pressure Systems

**44. Results**

Not  
Applicable

**44. Notes**

Not an LDC

 **SUMMARY OF REQUIRED COMMENTS**

---

**COMMENTS:** Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.