



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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CERTIFIED MAIL

December 21, 2012

Steve Pankhurst
President
BP Pipelines (North America) Inc.
150 W. Warrenville Road
Naperville, IL 60563

Dear Mr. Pankhurst:

RE: 2012 Natural Gas Standard Inspection—Arco Western Gas Pipe Line Company

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from November 26 to November 29, 2012, of Arco Western Gas Pipe Line Company. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates three areas of concern which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond to the areas of concern in writing by January 23, 2013. The response should include how and when you plan to bring these items into full compliance.

If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 664-1159.

Sincerely,

David D. Lykken
Pipeline Safety Director

Enclosure

cc: Dave Barnes, DOT Compliance, BP Pipelines (North America)



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2012 Natural Gas Pipeline Standard Inspection
Arco Western Gas Pipe Line Company

The following areas of concern of WAC 480-93 were noted as a result of the 2012 inspection of the Arco Western Gas Pipe Line Company. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

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.*

Finding(s):

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.

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.*

Finding(s):

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 fulfill this requirement.

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.*

Finding(s):

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.