

Inspection Output (IOR)

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Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	8987-8988_BP_Cherry Point Butane & Crude_Std_2025	Operator(s)	BP PIPELINE (NORTH AMERICA) INC. (31189)	Plan Submitted	07/18/2025
		Lead	Anthony Dorrrough	Plan Approval	07/24/2025 by Dennis Ritter
Status	LOCKED	Team Members	David Cullom, Derek Norwood, Scott Anderson, Tom Green, Jason Hoxit, Emma Barrett	All Activity Start	06/11/2025
Start Year	2025	Observer(s)	Matt Frost	All Activity End	07/01/2025
System Type	HL	Supervisor	Dennis Ritter	Inspection Submitted	07/25/2025
Protocol Set ID	WA.HL.2025.01	Director	Scott Rukke	Inspection Approval	07/25/2025 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This was a standard inspection of the BP Cherry Point Crude & Butane pipeline systems, which included an audit of pipeline records and pipeline facilities in the field.

Pipeline summary: A BP Cherry Point crude - 24-inch - 5 mile pipeline from TransMountain (formerly Kinder Morgan) to the BP Cherry Point Refinery and a butane - 6-inch - 5 mile pipeline from BP Cherry Point refinery to the ALA Energy.

Facilities visited and Total AFOD =3

Wed Jun 11 to Thu Jun 12 Records review via MS Teams online

Tue Jul 1 Field audit at Cherry Point Refinery and surrounding area and exit interview

Summary of Significant Findings

There were no significant findings.

Primary Operator contacts and/or participants

James H. Fraley Jr. /DOT Compliance Advisor/BP Pipelines North America

Operator executive contact and mailing address for any official correspondence

Chris Vodicka/North America Operations Manager chris.vodicka@bp.com (847) 682-4229 (office)

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Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1.	Crude - Butane Standard	8987-8988 BP Cherry Point (Butane and Crude) Std	unit	88979	Offshore GOM Crosses Nav. CO2 Biofuels Reg Rural Gather Rural Low Stress Abandoned BOT/RT	150	150	150	150	100.0%

8987-8988_BP_Cherry Point Butane & Crude_Std_2025

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
					Pump Stations HVL					

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	Crude - Butane Standard	WUTC Standard Inspection	AR, CR, DC, TDC, EP, FS, IM, MO, PD, RPT, SRN, TD, TQ, 114, GENERIC	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1	Crude-Butane Standard	--	06/11/2025	07/01/2025	--	all planned questions	all assets	all types	150	150	150	150	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	8988 BP Butane Std	COMPLETED	07/24/2025	Crude-Butane Standard	--

Results (all values, 156 results)

183 (instead of 156) results are listed due to re-presentation of questions in more than one sub-group.

CR.CRMRR: Roles and Responsibilities

1. Question Result, ID, References Sat, CR.CRMRR.PRESSLIMITS.O, 195.446(b)(2)

Question Text Are controllers aware of the current MOPs of all pipeline segments for which they are responsible, and have they been assigned the responsibility to maintain those pipelines at or below the MOP?

Assets Covered Crude - Butane Standard

Result Notes Staff was able to verify that controllers are aware and have access to current MOPs via computer.

CR.LD: Leak Detection (Non-CPM)

2. Question Result, ID, References Sat, CR.LD.EVAL.R, 195.444(a) (195.444(b), 195.134(a), 195.134(b))

Question Text Do records show that the operator evaluated the capability of its leak detection system to protect the public, property, and the environment and modified as necessary?

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No non-CPM pipelines in the system.

Reviewed leak test results for the crude and butane lines - Dated 11/20/20

3. Question Result, ID, References Sat, CR.LD.LDSYSTEM.R, 195.404(c) (195.134(b), 195.444(b))

Question Text *Do records demonstrate the operator's leak detection system is performing within the system design requirements?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No non-CPM pipelines in the system.

Reviewed leak test results for the crude and butane lines - Dated 11/20/20

4. Question Result, ID, References Sat, CR.LD.LDTRAINING.R, 195.507(a) (195.507(b))

Question Text *Do records show that pipeline controllers are trained to recognize leaks using the chosen leak detection method/system?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No non-CPM pipelines in the system.

Reviewed documentation which contained leak recognition for a list of controllers qualified to operate the crude & butane pipelines.

Qualified individuals identified: Zachariah Ames, Matthew Aschkenas, Dan Beam, Colton Enman, Douglas Mohr, Jeffrey Perryman, Tony Santillanes, Mark Spraggs and Naomi White.

5. Question Result, ID, References Sat, CR.LD.LDTRAINING.O, 195.505

Question Text *Are the Pipeline Controllers trained to recognize leaks?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No non-CPM pipelines in the system.

Reviewed documentation which contained leak recognition for a list of controllers qualified to operate the crude & butane pipelines.

Qualified individuals identified: Zachariah Ames, Matthew Aschkenas, Dan Beam, Colton Enman, Douglas Mohr, Jeffrey Perryman, Tony Santillanes, Mark Spraggs and Naomi White.

6. Question Result, ID, References NA, CR.LD.ALARMDISPLAY.O, 195.444(b)

Question Text *Are the Leak Detection alarms adequate?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

7. Question Result, ID, References Sat, CR.LD.LDSTEST.R, 195.134(b) (195.444(b))

Question Text *Have leak detection system testing records and results been retained/available and indicate adequate results?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No non-CPM pipelines in the system.

Reviewed leak testing records within the same report for crude and butane lines - Dated 11/20/20

8. Question Result, ID, References Sat, CR.LD.LDSINSTRUMENT.R, 195.444(b) (195.446(j))

Question Text *Do records indicate the calibration of field instrumentation used in the leak detection system was performed?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No non-CPM pipelines in the system.

Reviewed - Pressure Transmitter MAXIMO Reports for 2022- 2025.

DC.CO: Construction

9. Question Result, ID, References NA, DC.CO.ASMECONSTRUCTION.R,
Question Text *Do records indicate that new pipelines are designed and constructed in accordance with ASME B31.4?*
Assets Covered Crude - Butane Standard
Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
10. Question Result, ID, References NA, DC.CO.VALVEPROTECT.O, 195.258(a)
Question Text *Are valves accessible to authorized employees and protected from damage or tampering?*
Assets Covered Crude - Butane Standard
Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
11. Question Result, ID, References NA, DC.CO.VALVELOCATION.R, 195.266(f) (195.260(a), 195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f), 195.260(g))
Question Text *Do records indicate that valves are located as specified by §195.260?*
Assets Covered Crude - Butane Standard
Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
12. Question Result, ID, References NA, DC.CO.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f), 195.260(g))
Question Text *Are valves located as specified by §195.260?*
Assets Covered Crude - Butane Standard
Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
13. Question Result, ID, References NA, DC.CO.RECORDS.R, 195.266(a) (195.266(b), 195.266(c), 195.266(d), 195.266(e), 195.266(f))
Question Text *Do records indicate that construction records are being maintained for the life of each pipeline?*
Assets Covered Crude - Butane Standard
Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.

DC.PS: Construction - Pump Stations

14. Question Result, ID, References NA, DC.PS.VALVEPROTECT.O, 195.258(a)
Question Text *Are valves accessible to authorized employees and protected from damage or tampering?*
Assets Covered Crude - Butane Standard
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No pump stations on the pipeline system.
15. Question Result, ID, References NA, DC.PS.VALVELOCATION.R, 195.266(f) (195.260(a), 195.260(b), 195.260(c), 195.260(d), 195.260(e), 195.260(f))
Question Text *Do records indicate that valves are located as specified by 195.260?*
Assets Covered Crude - Butane Standard
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. No pump stations on the pipeline system.

16. Question Result, ID, **NA, DC.PS.VALVELOCATION.O, 195.260(a) (195.260(b), 195.260(c), 195.260(d), 195.260(e),**
References **195.260(f)**
Question Text *Are valves located as specified by 195.260?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. No pump stations on the pipeline system.**
17. Question Result, ID, **NA, DC.PS.PMPVENTILATE.O, 195.262(a)**
References
Question Text *Is adequate ventilation provided in pump station buildings to prevent the accumulation of hazardous vapors?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
18. Question Result, ID, **NA, DC.PS.PMPVAPOR.O, 195.262(a)**
References
Question Text *Do pumping station buildings have devices to warn of the presence of hazardous vapors?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**
19. Question Result, ID, **NA, DC.PS.PMPOVERPRESS.O, 195.262(b)**
References
Question Text *Do pumping stations have overpressure safety devices and emergency shutdown capability?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**
20. Question Result, ID, **NA, DC.PS.PMPPROPERTY.O, 195.262(d)**
References
Question Text *Is pumping equipment installed on property that is under the control of the operator and at least 15.2 m (50 ft) from the boundary of the pump station?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**
21. Question Result, ID, **NA, DC.PS.PMPFIREPROT.O, 195.262(e)**
References
Question Text *Is fire protection installed at each pump station?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**
22. Question Result, ID, **NA, DC.PS.PMPPROPERTY.R,**
References
Question Text *Do records indicate that pump stations are designed, sited, and constructed consistent with the requirements in WAC 480-75-380?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. No pump stations on the pipeline system.**

DC.WELDINSP: Construction Weld Inspection

23. Question Result, ID, **NA, DC.WELDINSP.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234)** (also presented in:
References **TDC.WELDINSP)**
Question Text *Do records indicate welds are inspected to ensure compliance with the requirements of 195.228?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**
24. Question Result, ID, **NA, DC.WELDINSP.WELDINSPECT.O, 195.228(a) (195.228(b), 195.234)** (also presented in:
References **TDC.WELDINSP)**
Question Text *Are welds being inspected to ensure compliance with the requirements of 195.228?*
Assets Covered **Crude - Butane Standard**

- Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
25. Question Result, ID, NA, DC.WELDINSP.WELDNDT.R, 195.234(a) (195.234(b), 195.234(c)) (also presented in: References TDC.WELDINSP)
 Question Text *Do records indicate adequate nondestructive testing and determination of standards of acceptability?*
 Assets Covered Crude - Butane Standard
 Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
26. Question Result, ID, NA, DC.WELDINSP.WELDNDT.O, 195.234(a) (195.234(b), 195.234(c)) (also presented in: References TDC.WELDINSP)
 Question Text *Are NDT activities performed in accordance with approved processes?*
 Assets Covered Crude - Butane Standard
 Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
27. Question Result, ID, NA, DC.WELDINSP.GIRTHWELDNDT.R, 195.234(d) (195.266(a)) (also presented in: TDC.WELDINSP) References
 Question Text *Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?*
 Assets Covered Crude - Butane Standard
 Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
28. Question Result, ID, NA, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a)) (also presented in: References TDC.WELDINSP)
 Question Text *Do records demonstrate all girth welds installed each day in selected locations specified in 195.234(e) are nondestructively tested over their entire circumference?*
 Assets Covered Crude - Butane Standard
 Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
29. Question Result, ID, NA, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a)) (also presented in: TDC.WELDINSP) References
 Question Text *Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?*
 Assets Covered Crude - Butane Standard
 Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.
30. Question Result, ID, NA, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a)) (also presented in: References TDC.WELDINSP)
 Question Text *Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?*
 Assets Covered Crude - Butane Standard
 Result Notes No such activity/condition was observed during the inspection. No new construction during the audit time period.

DC.WELDERQUAL: Construction Welder Qualification

31. Question Result, ID, NA, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME Boiler & Pressure Vessel Code Section IX) (also presented in: TDC.WELDERQUAL) References
 Question Text *Do records indicate that welders are qualified in accordance with API-Std-1104 (21st Edition) or the ASME Boiler & Pressure Vessel Code (2007)?*
 Assets Covered Crude - Butane Standard
 Result Notes No such activity/condition was observed during the inspection.
 There was no new construction during the audit time period.

DC.WELDPROCEDURE: Construction Welding Procedures

32. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b)** (also presented in: TDC.WELDPROCEDURE)
Question Text *Do records indicate welding procedures and qualifying tests recorded in detail?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**

DC.DN: Design

33. Question Result, ID, References **NA, DC.DN.VALVE.O, 195.116(f) (195.116(b), 195.116(c), 195.116(e))**
Question Text *Do pipeline system valves meet the requirements of 195.116?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**
34. Question Result, ID, References **Sat, DC.DN.LDDESIGN.R, 195.134(a) (195.134(b), 195.134(c))**
Question Text *Do records indicate evaluation of the leak detection system for its capability to protect the public, property, and the environment?*
Assets Covered **Crude - Butane Standard**
Result Notes **Reviewed leak test results for the crude and butane pipelines which included system evaluation- Report dated 11/20/20**
35. Question Result, ID, References **Sat, DC.DN.LDDESIGN.O, 195.134(b) (195.134(c))**
Question Text *Does the leak detection system perform to the system design requirements?*
Assets Covered **Crude - Butane Standard**
Result Notes **Reviewed leak test results for the crude and butane pipelines which included system evaluation- Report dated 11/20/20 - There were no issues.**

DC.MO: Maintenance and Operations

36. Question Result, ID, References **NA, DC.MO.SAFETY.O, 195.422(a) (195.402(c)(14))**
Question Text *Are pipeline maintenance construction and testing activities performed safely and in accordance with procedures to prevent damage to persons and property?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**

No repairs were made or needed on either pipeline system.
37. Question Result, ID, References **NA, DC.MO.MOVE.R,**
Question Text *Do records indicate that a study was prepared before moving or lowering a hazardous liquid pipeline?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**

There was no moving or lowering of either pipeline systems.
38. Question Result, ID, References **NA, DC.MO.MOVE.O, 195.424(a) (195.424(b), 195.424(c))**
Question Text *Does the operator perform pipeline movements in accordance with 195.424?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**

DC.PT: Pressure Testing

39. Question Result, ID, References **Sat, DC.PT.PRESSTEST.R, 195.310 (195.305(b))**

Question Text *Are pressure test records available and adequate?*

Assets Covered **Crude - Butane Standard**

Result Notes **Reviewed the butane pipeline system hydrotest result record - 450 psi - for 4hrs - on 10/29/09**

Reviewed the crude pipeline system hydrotest result record - 1048 psi - for 8hrs - on 8/22/01

40. Question Result, ID, References **NA, DC.PT.PRESSTEST.O, 195.302(a) (195.304, 195.305(a), 195.305(b), 195.306(a), 195.306(b), 195.306(c), 195.306(d), 195.307(a), 195.307(b), 195.307(c), 195.307(d), 195.307(e), 195.308)**

Question Text *Is pressure testing being adequately conducted?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such activity/condition was observed during the inspection.**

Per. test record results reviewed.

41. Question Result, ID, References **NA, DC.PT.PRESSTESTTIEIN.R, 195.308**

Question Text *Do records indicate pipe associated with tie-ins has been pressure tested?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such activity/condition was observed during the inspection.**

There was no new construction or repairs during the audit time-frame.

42. Question Result, ID, References **NA, DC.PT.PRESSTESTRPT.R,**

Question Text *Do records indicate the operator filed a report with the commission at least 45 days prior to pressure testing when increasing the MOP of the pipeline?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such activity/condition was observed during the inspection.**

There were no MOP increases for either pipeline systems within the audit time-frame.

DC.TQOQ: Training and Qualification (OQ)

43. Question Result, ID, References **Sat, DC.TQOQ.OQCONTRACTOR.R, 195.505(b) (Operators OQ program manual)**

Question Text *Are qualification records for contractor personnel maintained?*

Assets Covered **Crude - Butane Standard**

Result Notes **Verified the following for qualified contract individuals:**

Reviewed ILI project (Snelson) in Whatcom county - Feb/2025 - ILI dig - A Hanging-H crew performed excavation -

Qualified individual: Justin Johnson - ID# ISN-04736673

Performed the following tasks:

Task #7.2 - Prepare service for coating using hand and power tools.

Task #7.5 - Apply coating...

Task #32 - Observation of excavation activities.

Task #42.3 - Applying composite sleeve.

Qualified individual: Colby Tyra - ID# ISN-04894319

Task #7.2 - Prepare service for coating using hand and power tools.

Task #7.5 - Apply coating...

Task #32 - Observation of excavation activities.

Task #42.3 - Applying composite sleeve.

44. Question Result, ID, NA, DC.TQOQ.OQCONTRACTOR.O, 195.505(b) (Operators OQ program manual)
References
Question Text *Do selected contractor individuals performing covered tasks demonstrate adequate skills and knowledge?*
Assets Covered Crude - Butane Standard
Result Notes No such activity/condition was observed during the inspection.
45. Question Result, ID, Sat, DC.TQOQ.RECORDS.R, 195.505(b) (Operators OQ program manual)
References
Question Text *Does the operator maintain qualification records for operator personnel?*
Assets Covered Crude - Butane Standard
Result Notes **Staff Verified the following selected qualified operator employees:**

Charles Groves - good through 7/25/27

Kevin Washington - good through 6/6/27

Kyle Meeker - good through 8/6/27 (Damage prevention work only)
46. Question Result, ID, Sat, DC.TQOQ.OQPLAN.O, 195.505(b) (Operators OQ program manual)
References
Question Text *Do selected operator individuals performing covered tasks demonstrate adequate skills and knowledge?*
Assets Covered Crude - Butane Standard
Result Notes Staff reviewed - Kevin Washington - perform covered task at the pig launcher facility.
47. Question Result, ID, Sat, DC.TQOQ.EXCAVATE.R, 195.505(b) (ADB-2006-01)
References
Question Text *Do records demonstrate individuals who oversee marking, trenching and backfilling operations are qualified?*
Assets Covered Crude - Butane Standard
Result Notes Staff reviewed records for - Kyle Meeker - good through 8/6/27
48. Question Result, ID, NA, DC.TQOQ.EXCAVATE.O, 195.505(b) (ADB-2006-01)
References
Question Text *Do selected individuals who oversee marking, trenching and backfilling operations demonstrate adequate skills and knowledge?*
Assets Covered Crude - Butane Standard
Result Notes No such activity/condition was observed during the inspection.

EP.ERL: Emergency Response Liquids

49. Question Result, ID, Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4 (1st Edition))
References (also presented in: PD.PA)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*
Assets Covered Crude - Butane Standard
Result Notes BP utilizes PARADIGM for excavator liaison and use EMA Program - for liaison with emergency responders.

50. Question Result, ID, References **Sat, EP.ERL.NOTICES.R, 195.402(a) (195.402(e)(1))**
 Question Text *Do records indicate receiving, identifying, classifying and communicating notices of events requiring immediate response in accordance with procedures?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Controllers are located in Tulsa, OK - There were no leak complaint or odor complaint call records or notices of events requiring immediate response during the audit time-frame. All phones have the capability to roll over to other controller personnel and multiple control rooms.**
51. Question Result, ID, References **NA, EP.ERL.AUTHORITIES.R, 195.402(a) (195.402(e)(7))**
 Question Text *Do records indicate that notifications were made to fire, police, and other appropriate public officials of hazardous liquid emergencies and were coordinated with preplanned and actual responses (including additional precautions necessary for an emergency involving HVLs)?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**
52. Question Result, ID, References **NA, EP.ERL.POSTEVTNTREVIEW.R, 195.402(a) (195.402(e)(7), 195.402(e)(9))**
 Question Text *Do records indicate post-accident reviews of employee activities were performed to determine whether the procedures were effective in each emergency and take corrective action where deficiencies are found?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**
53. Question Result, ID, References **NA, EP.ERL.COMMSYS.R, 195.408(b)**
 Question Text *Do records indicate emergency communication system(s) use was as required?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**

EP.ETR: Emergency Training of Personnel

54. Question Result, ID, References **Sat, EP.ETR.TRAINING.R, 195.403(a)**
 Question Text *Do records indicate the operator provided training to its emergency response personnel as required?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **It is mandatory for the following qualified individuals to participate in training and drills annually.**

Reviewed records for Charles Groves - good through 7/25/27

Reviewed records for Kevin Washington - good through 6/6/27
55. Question Result, ID, References **Sat, EP.ETR.TRAININGREVIEW.R, 195.403(b)**
 Question Text *Have annual reviews of the emergency response program been conducted and appropriate changes made as necessary to ensure it is effective?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Reviewed - 2023 Annual Review - June**

Reviewed 2024 Annual Review - June
56. Question Result, ID, References **Sat, EP.ETR.TRAININGSUPERVISE.R, 195.403(c)**
 Question Text *Do records indicate verification that supervisors are knowledgeable of emergency response procedures for which they are responsible?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Reviewed records for - Edward Castleberry - 0367GU - HAZWOPER Level 5 - 2017 - Dec 21, 2024**

According to BP - Luke Wiebe = will be the new supervisor in 2026

57. Question Result, ID, References **NA, EP.ETR.TRAININGSUPERVISE.O, 195.403(c)**
Question Text *Do emergency response supervisors demonstrate adequate skills and knowledge?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**

Check the response numbers on any signage during the field portion.

Check any emergency response or deployment drills to indicate if supervisor's were knowledgeable.

Check for AOC awareness during the field portion.

EP.FAI: Failure & Accident Investigation

58. Question Result, ID, References **NA, EP.FAI.ACCIDENTANALYSIS.R, 195.402(a) (195.402(c)(5))**
Question Text *Do records indicate pipeline accidents were analyzed to determine their causes?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**
59. Question Result, ID, References **NA, EP.FAI.FAILUREANALYSIS.R, 195.402(a) (195.402(c)(5))**
Question Text *Do records indicate pipeline failures were analyzed to determine their causes?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**

FS.FG: Facilities General

60. Question Result, ID, References **Sat, FS.FG.FACPROTECT.O, 195.436** (also presented in: PD.SN)
Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*
Assets Covered **Crude - Butane Standard**
Result Notes **Staff was able to verify adequate security and had a discussion with qualified personnel about security history of the Crude & Butane pipeline segments with no issues found.**
61. Question Result, ID, References **Sat, FS.FG.IGNITION.O, 195.438** (also presented in: PD.SN)
Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*
Assets Covered **Crude - Butane Standard**
Result Notes **Staff noted all signage was readable and contained the required information, including working emergency phone contacts and in some cases QR codes that takes callers to more detailed information.**
62. Question Result, ID, References **NA, FS.FG.SIGNAGE.O, 195.434** (also presented in: PD.SN)
Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
63. Question Result, ID, References **Sat, FS.FG.FIREPROT.R, 195.404(c)(3) (195.430(a), 195.430(b), 195.430(c))**
Question Text *Are records of inspections of firefighting equipment adequate?*
Assets Covered **Crude - Butane Standard**
Result Notes **Reviewed monthly MAXIMO fire extinguisher reports - for 2022-2025.**
64. Question Result, ID, References **NA, FS.FG.FIREPROT.O, 195.430(a) (195.430(b), 195.430(c), 195.262(e))**
Question Text *Has adequate fire protection equipment been installed at pump station/breakout tank areas and is it maintained properly?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

MO.LO: Liquid Pipeline Operations

65. Question Result, ID, References Sat, MO.LO.OMMANUALREVIEW.R, 195.402(a)

Question Text *Do records indicate annual reviews of the written procedures in the manual were conducted as required?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed Liquid OMER Annual Review Notes - for 2022 - 2024 - last completed 4/11/2024

66. Question Result, ID, References Sat, MO.LO.OMHISTORY.R, 195.404(a) (195.404(c), 195.9, 195.402(c)(1))

Question Text *Do records indicate current maps and records of the pipeline system are maintained and made available as necessary?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed - MAXIMO repair & inspection reports - and the Trailblazer Map that correlates with these reports.

67. Question Result, ID, References Sat, MO.LO.OMEFFECTREVIEW.R, 195.402(a) (195.402(c)(13), 195.404(a))

Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and corrective action taken where deficiencies are found?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed MAXIMO Reports -Work Procedures Study Results - from 2022 - 2024.

MO.LOMOP: Liquid Pipeline MOP

68. Question Result, ID, References Sat, MO.LOMOP.MOPDETERMINE.R, 195.402(c)(3) (195.406(a), 195.406(b), 195.302(b), 195.302(c), ASME B31.8-2008)

Question Text *Do records indicate the maximum operating pressure was established in accordance with 195.406?*

Assets Covered Crude - Butane Standard

MO.LMOPP: Liquid Pipeline Overpressure Protection

69. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a)) (also presented in: FS.PS)

Question Text *Do records indicate inspection and testing of each overpressure safety device on its non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed MAXIMO reports - for pig receiver & launcher - BP run dry traps now - closed trap 2022 - 2025 Crude & Butane

70. Question Result, ID, References Sat, MO.LMOPP.PRESSREGTESTHVL.R, 195.404(c) (195.428(a)) (also presented in: FS.PS)

Question Text *Do records indicate inspection and testing of each overpressure safety device on HVL pipelines at intervals not to exceed 7.5 months, but at least twice each calendar year?*

Assets Covered Crude - Butane Standard

Result Notes Staff reviewed overpressure protection device inspection records for the inspection time-frame via BP's online documentation.

71. Question Result, ID, References NA, MO.LMOPP.PRESSREGTEST.O, 195.428(a) (also presented in: FS.PS)

Question Text *Are inspections of overpressure safety devices adequate (including HVL lines)?*

Assets Covered Crude - Butane Standard

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

72. Question Result, ID, References NA, MO.LMOPP.LAUNCHRECVRELIEF.O, 195.426 (also presented in: FS.PS)

Question Text *Are launchers and receivers equipped with relief devices?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

73. Question Result, ID, References **Sat, MO.LMOPP.SURGEANALYSIS.R,**

Question Text *Do records indicate that a surge analysis was completed to ensure that the surge pressure does not exceed one hundred ten percent of the MOP?*

Assets Covered **Crude - Butane Standard**

Result Notes **Reviewed - Crude Surge Analysis - 9/27/2023**

Reviewed - Butane Surge Analysis - 4/11/2005

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

74. Question Result, ID, References **Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b))** (also presented in: PD.RW)

Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*

Assets Covered **Crude - Butane Standard**

Result Notes **Reviewed Master Pilot Report for crude & butane pipeline systems 2023-2024.**

Reviewed weekly Ground Patrols for crude & butane pipeline systems 2022-2024.

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

75. Question Result, ID, References **Sat, MO.ABNORMAL.ABNORMAL.R, 195.404(b) (195.402(d)(1))**

Question Text *Do records indicate operator's personnel responded to indications of abnormal operations as required by the written procedures?*

Assets Covered **Crude - Butane Standard**

Result Notes **Reviewed the following work order records:**

W/O #8684596

W/O #9088420

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

76. Question Result, ID, References **Sat, MO.RW.ROWCONDITION.O, 195.412(a)** (also presented in: PD.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered **Crude - Butane Standard**

Result Notes **Staff observed that all ROW markers encountered during the field portion of the audit were adequately maintained.**

MO.LM: Liquid Pipeline Maintenance

77. Question Result, ID, References **Sat, MO.LM.VALVEMAIN.T.R, 195.404(c) (195.420(a), 195.420(b))** (also presented in: FS.VA)

Question Text *Do records indicate each mainline valve was inspected as required?*

Assets Covered **Crude - Butane Standard**

Result Notes **Reviewed all mainline Valve records (inspected 2x per. year) - 2022- 2024 - staff observed that no dates were exceeded.**

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

78. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c))** (also presented in: PD.RW)
Question Text *Are line markers placed and maintained as required?*
Assets Covered **Crude - Butane Standard**
Result Notes **Staff observed that all ROW markers encountered during the field portion of the audit were adequately placed and with the proper content, and in some cases with QR codes that take callers to more detailed information.**

MO.LM: Liquid Pipeline Maintenance

79. Question Result, ID, References **NA, MO.LM.AETREQUIREMENT.R, 195.404(c)**
Question Text *Do the records demonstrate that the operator complied with the requirements for AET response drills?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

MO.ABNORMAL: Liquid Pipeline Abnormal Operations

80. Question Result, ID, References **NA, MO.ABNORMAL.ABNORMALREVIEW.R, 195.404(b) (195.402(d)(5))**
Question Text *Do records indicate post-event reviews of actions taken by operator personnel to determine the effectiveness of the abnormal operation procedures and whether corrective actions were taken where deficiencies were found?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**

MO.LM: Liquid Pipeline Maintenance

81. Question Result, ID, References **NA, MO.LM.RMVREMEDIAL.R, 195.420(f)**
Question Text *Do the records demonstrate the remedial measure requirements for RMVs or AETs were met?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

82. Question Result, ID, References **Sat, MO.RW.DEPTHSURVEY.R,**
Question Text *Do records indicate that depth of cover surveys were completed as required by WAC 480-75-640?*
Assets Covered **Crude - Butane Standard**
Result Notes **Reviewed Depth of Cover Survey - for the crude & butane pipeline systems (same date as CIS).**

MO.LM: Liquid Pipeline Maintenance

83. Question Result, ID, References **NA, MO.LM.ASVSHUTINPRESS.R, 195.404(c) (195.419(f), 195.420(g))**
Question Text *Do the records demonstrate the process for confirming ASV shut-in pressures?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
84. Question Result, ID, References **Sat, MO.LM.VALVEMAIN.T.O, 195.420(a) (195.420(c))** (also presented in: FS.VA)
Question Text *Do the pipeline system valves appear to be in good working order and are they protected from unauthorized operation?*
Assets Covered **Crude - Butane Standard**
Result Notes **Staff noted that all observed valves were adequately protected from unauthorized operation and appeared to be in good working order.**

MO.RW: ROW Markers, Patrols, Monitoring and Analysis

85. Question Result, ID, References **NA, MO.RW.CHANGEINCLASS.R,**

Question Text *Do records indicate that the operator reevaluated class location periodically, but not less often than once every five years?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

There are no new pipelines.

MO.LC: Liquid Conversion

86. Question Result, ID, References **NA, MO.LC.CONVERSION.R, 195.5(c) (195.5(a), 195.5(d))**

Question Text *Do records indicate the process was followed for converting any pipelines into Part 195 service?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such activity/condition was observed during the inspection.**

MO.EW: Extreme Weather

87. Question Result, ID, References **NA, MO.EW.EXTWEATHERINSPIMPL.R, 195.404(c) (195.414(a), 195.414(b), 195.414(c), 195.414(d))**

Question Text *Do records indicate the operator conducted the required inspection following an extreme weather or natural disaster event?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

88. Question Result, ID, References **NA, MO.EW.EXTWEATHERINSPSAFE.O, 195.414(d)**

Question Text *Are the pipeline facilities that were affected by an extreme weather or natural disaster event back to a safe operating condition?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such activity/condition was observed during the inspection.**

PD.DP: Damage Prevention

89. Question Result, ID, References **Sat, PD.DP.PROGRAM.R, 195.442(a)**

Question Text *Do records indicate the damage prevention program is being carried out as written?*

Assets Covered **Crude - Butane Standard**

Result Notes **BP Utilizes a program called UTILISPHERE, Staff reviewed the following randomly selected tickets:**

Ticket# 22019659 (crude)

Ticket# 23089297 (crude)

Ticket# 23328743 (crude) - 8/16/2023

Ticket# 23330257 (Crude) - 8/18/2023

90. Question Result, ID, References **NA, PD.DP.NOTICETOEXCAVATOR.R,**

Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*

Assets Covered **Crude - Butane Standard**

Result Notes **No such activity/condition was observed during the inspection.**

91. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**
 Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-75-630(6)?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**
92. Question Result, ID, References **Sat, PD.DP.LOCATES.R,**
 Question Text *Do records indicate hazardous liquid pipeline locations have been marked in the timeframe outlined in RCW 19.122?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **BP Utilizes a program called UTILISPHERE, Staff reviewed the following randomly selected tickets for timeframe compliance:**
- Ticket# 22019659 (crude)**
- Ticket# 23089297 (crude)**
- Ticket# 23328743 (crude) - 8/16/2023**
- Ticket# 23330257 (Crude) - 8/18/2023**

PD.PA: Public Awareness

93. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 195.440(d) (195.440(e), 195.440(f), API RP 1162 (1st Edition) Section 2.2, API RP 1162 (1st Edition) Section 3)**
 Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Reviewed - Whatcom County mailing list - (No mail receipts are documented but they did track the numbers)**
94. Question Result, ID, References **Sat, PD.PA.EDUCATE.R, 195.440(d) (195.440(f))**
 Question Text *Do records indicate delivered messages specifically included provisions to educate the public, emergency officials, local public officials, and excavators on the categories defined in §195.440(d)?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Reviewed the latest brochures with no issues identified.**
95. Question Result, ID, References **Sat, PD.PA.LOCATIONMESSAGE.R, 195.440(e) (195.440(f))**
 Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Staff verified that messages were delivered, there were no issues identified.**
96. Question Result, ID, References **Sat, PD.PA.MESSAGEFREQUENCY.R, 195.440(c) (API RP 1162 (1st Edition)Table 2-1)**
 Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162 (1st Edition), Table 2-1?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Staff verified delivery and noted the following dates: 6/6/2023 & 6/19/2024**
97. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 195.440(g) (API RP 1162 (1st Edition) Section 2.3.1)**
 Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered Crude - Butane Standard

Result Notes **Were adequate efforts made to identify any non-English speaking populations?**

Did Whatcom county meet the threshold for an alternative language since the last inspection? No - But have chosen Spanish based on known speaking populations in the area.

How does BP identify non-English speaking populations? They perform a survey of the data provided by the census and (ENERTECH) which also utilizes the census.

How does BP track those populations? They utilize a survey provided by ENERTECH.

98. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 195.440(c) (195.440(i), API RP 1162 (1st Edition) Section 8.3)
Question Text *Has an audit or review of the public awareness program implementation been performed annually since the program was developed?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed - the Internal Self Assessment - for 2023 - 2024.
99. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 195.440(c) (195.440(i), API RP 1162 (1st Edition) Section 8.3)
Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of the public awareness program implementation?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed - the Internal Audit- Four year - utilizing PAPERS (API) which surveys stakeholder groups

Reviewed - PAPERS for 2023.
100. Question Result, ID, References Sat, PD.PA.PROGRAMIMPROVE.R, 195.440(c) (API RP 1162 (1st Edition) Section 8.3)
Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed all changes to the 2025 program that also covered assessments for 2023-2024.
101. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 195.440(c) (API RP 1162 (1st Edition) Sections 8.4)
Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed the Effective Evaluation for 2018- 2021 - completed June 30, 2022.
102. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 195.440(c) (2025.01 - Edited considerations or references for 2024 IBR rule. (9/4/24, TJD). Section 8.4.1)
Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed the process - Section 5.0 Efforts to Measure Supplemental Outreach - and reviewed the results for all stakeholders.
103. Question Result, ID, References Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 195.440(c) (API RP 1162 (1st Edition) Section 8.4.2)
Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed the effectiveness evaluation process - Section 6.0 Efforts to Measure Recall & Reach

Reviewed percentage numbers - nothing was below 50%
104. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 195.440(c) (API RP 1162 (1st Edition) Section 8.4.3)

Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed the effectiveness evaluation process - Section 7.0 Efforts to Measure Comprehension & Knowledge

BP Mailed survey out 6 times from 2007 -2021

Reviewed percentages.

105. Question Result, ID, References Sat, PD.PA.MEASUREBOTTOM.R, 195.440(c) (API RP 1162 (1st Edition) Section 8.4.4)

Question Text *Did the operator attempt to measure bottom-line results of the program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*

Assets Covered Crude - Butane Standard

Result Notes Staff noted per. BP results that the Washington state pipeline systems experienced the largest volume of near misses, which was attributed to the fact that Washington reports near misses, when other units rarely do.

106. Question Result, ID, References Sat, PD.PA.CHANGES.R, 195.440(c) (API RP 1162 (1st Edition) Section 2.7 (Step 12), API RP 1162 (1st Edition) Section 8.5)

Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed - Change Log - for 2025 Program and Annual Assessment.

RPT.RR: Regulatory Reporting (Traditional)

107. Question Result, ID, References Sat, RPT.RR.ANNUALREPORT.R, 195.49 (195.13(b), 195.15(b))

Question Text *Do the records indicate that complete and accurate Annual Reports have been submitted?*

Assets Covered Crude - Butane Standard

Result Notes **Reviewed the following Annual Report records:**

2022 (Crude) submitted 5/25

2022 (Butane) submitted 5/25

2025 (Crude) submitted 5/16

2025 (Butane) submitted 5/16

108. Question Result, ID, References NA, RPT.RR.GRAVITY.R, 195.49 (195.13(b))

Question Text *Do Annual Reports include applicable information for gravity lines?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

109. Question Result, ID, References NA, RPT.RR.REGONLYGATHER.R, 195.49 (195.15(b))

Question Text *Do Annual Reports include applicable information for reporting-regulated gathering lines?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

110. Question Result, ID, References NA, RPT.RR.ACCIDENTREPORT.R, 195.54(a) (195.50(a), 195.50(b), 195.50(c), 195.50(d), 195.50(e), 195.13(b), 195.15(b))

Question Text *Do records indicate the original accident reports were filed as required?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

111. Question Result, ID, References **NA, RPT.RR.ACCIDENTREPORTSUPP.R, 195.54(b) (195.13(b), 195.15(b))**
 Question Text *Do records indicate accurate supplemental accident reports were filed and within the required timeframe?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**
112. Question Result, ID, References **NA, RPT.RR.IMMEDREPORT.R, 195.52(a) (195.52(b), 195.52(c), 195.52(d))**
 Question Text *Do records indicate immediate notifications of accidents were made in accordance with 195.52?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**
113. Question Result, ID, References **NA, RPT.RR.SRCR.R, 195.58 (195.55(a), 195.55(b), 195.56(b), 195.13(b), 195.15(b), 195.402(a))**
 Question Text *Do records indicate Safety-Related Condition Reports were filed as required?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**
114. Question Result, ID, References **Sat, RPT.RR.NPMSANNUAL.R, 195.61(a) (195.61(b))**
 Question Text *Do records indicate: NPMS submissions are completed each year, on or before June 15, representing all in service, idle and retired assets as of December 31 of the previous year, and if no modifications occurred an email to that effect was submitted?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Reviewed all submission dates (emailed) - There were no issues.**
115. Question Result, ID, References **NA, RPT.RR.PIPELINEMAPPING.R,**
 Question Text *Do records indicate that accurate maps (or updates) are provided for pipelines operating over 250 PSIG to specifications developed by the commission and sufficient to meet the needs of first responders?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**
116. Question Result, ID, References **NA, RPT.RR.CONSTRUCTIONREPORT.R,**
 Question Text *Do records indicate operator has reported all construction of new pipelines intended to operate at 20% SMYS or greater at least 45 days prior to construction?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**
117. Question Result, ID, References **NA, RPT.RR.DIRTREPORTS.R,**
 Question Text *Do records indicate that the operator has submitted reports of damage to the commission using the Damage Information Reporting Tool (DIRT) within 45 days?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**

TD.ATM: Atmospheric Corrosion

118. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.R, 195.589(c) (195.583(a), 195.583(b), 195.583(c))**
 Question Text *Do records document inspection of aboveground pipe exposed to atmospheric corrosion?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Reviewed the 3-yr inspection cycle records for 2022-2024.**
119. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 195.583(c) (195.581(a))**
 Question Text *Is aboveground pipe that is exposed to atmospheric corrosion protected?*
 Assets Covered **Crude - Butane Standard**

Result Notes Staff observed that all pipe at soil-to-air interfaces and at pipe supports were encountered during the field portion of the audit were adequate. BP paints all aboveground piping on the Crude & Butane pipeline systems quarterly, there were no issues found.

TD.CP: External Corrosion - Cathodic Protection

120. Question Result, ID, References **NA, TD.CP.NEWOPERATE.R, 195.589(c) (195.563(a))**
Question Text *Do records document when cathodic protection was operational on constructed, relocated, replaced, converted to service, or otherwise changed pipelines?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
121. Question Result, ID, References **NA, TD.CP.UNPROTECT.R, 195.589(c) (195.573(b)(1), 195.573(b)(2))**
Question Text *Do records document the adequate re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
122. Question Result, ID, References **Sat, TD.CP.ISOLATE.R, 195.589(c) (195.575(a), 195.575(b), 195.575(d))**
Question Text *Do records document adequate electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
Assets Covered **Crude - Butane Standard**
Result Notes **Reviewed crude & butane survey document records for 2022 - 2024.**
123. Question Result, ID, References **Sat, TD.CP.ISOLATE.O, 195.575(a) (195.575(b), 195.575(d))**
Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
Assets Covered **Crude - Butane Standard**
Result Notes **Staff observed that isolation devices were installed adequately and properly where installation of such devices was required to facilitate CP.**
124. Question Result, ID, References **NA, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e))** (also presented in: TD.CPMONITOR, TD.CPEXPOSED)
Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**

No deficiencies found for any of the years in the inspection time-frame.
125. Question Result, ID, References **Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b))** (also presented in: TD.CPMONITOR)
Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*
Assets Covered **Crude - Butane Standard**
Result Notes **Reviewed maps and records for crude & butane pipelines with no issues identified.**

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

126. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEADINSTALL.R, 195.589(c) (195.567(b))**
Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart H?*
Assets Covered **Crude - Butane Standard**

Result Notes Reviewed maps and records for crude & butane pipelines and determined there were [45] test stations, and there were no issues identified.

127. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEADINSTALL.O, 195.567(a) (195.567(b))
Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart H?*
Assets Covered Crude - Butane Standard
Result Notes Staff observed during the field portion of the audit that all Test leads encountered were located at adequate intervals to obtain proper electrical measurements of cathodic protection.
128. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEADMAINT.R, 195.589(c) (195.567(c))
Question Text *Do records document that CP test lead wires have been properly maintained?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed maps and records for crude & butane pipelines and determined there were [45] test stations, and there were no issues identified.
129. Question Result, ID, References Sat, TD.CPMONITOR.TESTLEADMAINT.O, 195.567(c)
Question Text *Are CP test lead wires properly maintained?*
Assets Covered Crude - Butane Standard
Result Notes Staff observed that all test leads encountered during the field portion of the audit were properly maintained and adequate to determine whether cathodic protection criteria had been met.
130. Question Result, ID, References Sat, TD.CPMONITOR.MONITOR.O, 195.571
Question Text *Do the methods for taking CP monitoring readings allow for the application of appropriate CP monitoring criteria?*
Assets Covered Crude - Butane Standard
Result Notes Staff observed that CP personnel demonstrated adequate methods for taking CP monitoring readings.
131. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 195.589(c) (195.573(a)(1))
Question Text *Do records adequately document required tests have been done on pipe that is cathodically protected?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed record of annual survey criteria with no findings.
132. Question Result, ID, References Sat, TD.CPMONITOR.CIS.R, 195.589(c) (195.573(a)(2))
Question Text *Do records document, when circumstances dictated a need for close interval surveys, dates of completed surveys, data from completed surveys and analysis of completed surveys?*
Assets Covered Crude - Butane Standard
Result Notes Reviewed selected pages of the CIS - completed 3/13/20 - 3/20/20 - No issues were identified.
133. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 195.589(c) (195.573(c))
Question Text *Do records document adequate electrical checks of rectifiers, interference bonds, diodes, and reverse current switches and at the required intervals?*
Assets Covered Crude - Butane Standard
Result Notes **Staff verified records provide sufficient detail of electrical checks for proper performance.**

Reviewed records for 2020-2024

Noted: Auto-potential rectifier adjusts to near zero when smelter operations are shutdown, since Intalco has been dismantled the rectifier outputs are extremely low.
134. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.O, 195.573(c)
Question Text *Are rectifiers, interference bonds, diodes, and reverse current switches properly maintained and are they functioning properly?*
Assets Covered Crude - Butane Standard

Result Notes Staff observed that all rectifiers were properly maintained and functioning and that CP personnel demonstrated adequate knowledge during electrical checks of rectifiers, and adequate knowledge of reverse current switches, diodes, critical bonds, and interference bonds.

Note: All rectifiers had identification labels that were unreadable.

135. Question Result, ID, References Sat, TD.CPMONITOR.INTFRCURRENT.R, 195.589(c) (195.577(a))

Question Text *Do records document that the operator has an effective program in place to minimize the detrimental effects of interference currents on their pipeline system, and is minimizing detrimental effects of interference currents from their CP systems on other underground metallic structures?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed records for 2020-2024

Noted: Auto-potential rectifier adjusts to near zero when smelter operations are shutdown, since Intalco has been dismantled the rectifier outputs are extremely lows.

TD.COAT: External Corrosion - Coatings

136. Question Result, ID, References NA, TD.COAT.NEWPIPEINSPECT.R,

Question Text *Do records indicate that the operator electrically inspected all new coated pipe using a holiday detector?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

137. Question Result, ID, References NA, TD.COAT.NEWPIPE.R, 195.589(c) (195.557(a), 195.559, 195.401(c))

Question Text *Do records document that coatings for pipelines constructed, relocated, replaced, or otherwise changed meet the requirements of §195.559?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

138. Question Result, ID, References NA, TD.COAT.CONVERTPIPE.R, 195.589(c) (195.557(b), 195.559)

Question Text *Do records document that pipelines that have been converted to liquid service and were constructed after the applicable date in 195.401(c) have external coating?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

139. Question Result, ID, References NA, TD.COAT.COATAPPLY.R, 195.589(c) (195.559(b), 195.401(c))

Question Text *Do records document that coatings are applied as required by procedures?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

140. Question Result, ID, References NA, TD.COAT.COATAPPLY.O, 195.561(a) (195.561(b), 195.559(b), 195.252(b))

Question Text *Is protective coating adequately applied?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

141. Question Result, ID, References Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 195.589(c) (195.569)

Question Text *Do records document that exposed buried piping was adequately examined for corrosion and deteriorated coating?*

Assets Covered Crude - Butane Standard

Result Notes Staff verified records that exposed buried pipe was examined for corrosion and deteriorated coating.

Reviewed all R & I reports for the audit timeframe and found no issues.

142. Question Result, ID, References NA, TD.CPEXPOSED.EXPOSEINSPECT.O, 195.569

Question Text *Verify that exposed buried piping is examined for corrosion and deteriorated coating.*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

143. Question Result, ID, References NA, TD.CPEXPOSED.EXTCORRODEREPAIR.R, 195.589(c) (195.585(a), 195.585(b))

Question Text *Do records document the repair or replacement of pipe that has been externally corroded to an extent that there is not sufficient remaining pipe wall strength?*

Assets Covered Crude - Butane Standard

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

TD.ICP: Internal Corrosion - Preventive Measures

144. Question Result, ID, References Sat, TD.ICP.INVESTREMED.R, 195.589(c) (195.579(a))

Question Text *Do records document investigation and mitigation of the corrosive effects of hazardous liquids or carbon dioxide being transported?*

Assets Covered Crude - Butane Standard

Result Notes **Staff verified that records document methods for investigating if the hazardous liquids or carbon dioxide being transported are corrosive.**

BP performs Maintenance Pigging & Bacteria Sampling & ER Probes - BP has checked and both pipeline are considered to be in the low category.

Reviewed ER Probe Records - (read twice a year)

5/19 & 12/15/22

6/23 & 11/13/23

5/16 & 11/21/24

145. Question Result, ID, References NA, TD.ICP.INHIBITOR.R, 195.589(c) (195.579(b)(1), 195.579(b)(2), 195.579(b)(3))

Question Text *Do records document that corrosion inhibitors have been used in sufficient quantity?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

146. Question Result, ID, References NA, TD.ICP.EXAMINE.R, 195.589(c) (195.579(c), 195.579(a))

Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

TQ.PROT9: OQ Protocol 9

147. Question Result, ID, References Sat, TQ.PROT9.TASKPERFORMANCE.O, 195.501(a) (195.509(a))

Question Text *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.*

Assets Covered Crude - Butane Standard

Result Notes Staff observed qualified individuals performed the observed covered tasks in accordance with the operator's procedures, with no issues.

148. Question Result, ID, References **Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 195.501(a) (195.509(a))**
 Question Text *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Staff previously verified that all individuals performing covered tasks during the observation/field portion of the audit were currently qualified.**
149. Question Result, ID, References **Sat, TQ.PROT9.AOCRECOG.O, 195.501(a) (195.509(a))**
 Question Text *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Staff observed that individuals performing covered tasks demonstrated adequate knowledge of the AOCs applicable to the covered task being performed.**
150. Question Result, ID, References **Sat, TQ.PROT9.VERIFYQUAL.O, 195.501(a) (195.509(a))**
 Question Text *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Staff previously verified that all individuals performing covered tasks during the observation/field portion of the audit were currently qualified.**
151. Question Result, ID, References **NA, TQ.PROT9.CORRECTION.O, 195.501(a) (195.509(a))**
 Question Text *Have potential issues identified by the OQ plan inspection process been corrected at the operational level?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection.**

TQ.OQ: Operator Qualification

152. Question Result, ID, References **Sat, TQ.OQ.OQCONTRACTOR.R, 195.507(a) (195.507(b))**
 Question Text *Are adequate records containing the required elements maintained for contractor personnel?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Qualified individual: Justin Johnson - ID# ISN-04736673**

Performed the following tasks:

Task #7.2 - Prepare service for coating using hand and power tools.

Task #7.5 - Apply coating...

Task #32 - Observation of excavation activities.

Task #42.3 - Applying composite sleeve.

Qualified individual: Colby Tyra - ID# ISN-04894319

Task #7.2 - Prepare service for coating using hand and power tools.

Task #7.5 - Apply coating...

Task #32 - Observation of excavation activities.

Task #42.3 - Applying composite sleeve.

153. Question Result, ID, References **Sat, TQ.OQ.RECORDS.R, 195.507(a) (195.507(b))**
Question Text *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?*
Assets Covered **Crude - Butane Standard**
Result Notes **Staff verified qualification for the following selected operator employees:**

Charles Groves - good through 7/25/27

Kevin Washington - good through 6/6/27

Kyle Meeker - good through 8/6/27 (Damage prevention work only)

TQ.QU: Qualification of Personnel - Specific Requirements

154. Question Result, ID, References **Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.555 (195.507(a), 195.507(b))** (also presented in: TD.CP)
Question Text *Is qualification of supervisors in corrosion control procedures documented?*
Assets Covered **Crude - Butane Standard**
Result Notes **Reviewed the following supervisor qualifications for Brian Stone:**

NACE Certificate - dated December 31, 2025 - Cert. No. 27908

NACE CP2 - Cathodic Protection Certified Technician - September 30, 2025 - Cert. No. 14342

NACE Internal Corrosion Technologist - Sept 30, 2025 - Cert No. 14342

TQ.QUOMCONST: Qualification of Personnel - Specific Requirements (O and M Construction)

155. Question Result, ID, References **Sat, TQ.QUOMCONST.INSPECTORQUAL.R, 195.204**
Question Text *Do records indicate adequate qualification documentation for personnel who conduct pipe or pipeline system construction inspections? (TQ.QUOMCONST.INSPECTORQUAL.R) (detail)*
Assets Covered **Crude - Butane Standard**
Result Notes **Staff verified qualification for the following selected operator employees:**

Charles Groves - good through 7/25/27

Kevin Washington - good through 6/6/27

Kyle Meeker - good through 8/6/27 (Damage prevention work only)

TQ.TROMCONST: Training of Personnel - O and M Construction

156. Question Result, ID, References **Sat, TQ.TROMCONST.NDT.R, 195.234(b)(2)**
Question Text *Is training for personnel, who perform nondestructive testing of welds, documented and demonstrated?*
Assets Covered **Crude - Butane Standard**
Result Notes **Staff verified training for the following selected qualified operator employees:**

Charles Groves - good through 7/25/27

Kevin Washington - good through 6/6/27

Kyle Meeker - good through 8/6/27 (Damage prevention work only)

TDC.WELDPROCEDURE: New Tank Piping - Construction Welding Procedures (Re-Presented)

157. Question Result, ID, References **NA, DC.WELDPROCEDURE.WELDPROCEDURE.R, 195.214(b)** (also presented in: DC.WELDPROCEDURE)
Question Text *Do records indicate welding procedures and qualifying tests recorded in detail?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**

TDC.WELDERQUAL: New Tank Piping - Construction Welder Qualification (Re-Presented)

158. Question Result, ID, References **NA, DC.WELDERQUAL.WELDERQUAL.R, 195.222(a) (195.222(b), 195.214(a), API-1104 Section 6, ASME Boiler & Pressure Vessel Code Section IX)** (also presented in: DC.WELDERQUAL)
Question Text *Do records indicate that welders are qualified in accordance with API-Std-1104 (21st Edition) or the ASME Boiler & Pressure Vessel Code (2007)?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection.**

There was no new construction during the audit time period.

TDC.WELDINSP: New Tank Piping - Construction Weld Inspection (Re-Presented)

159. Question Result, ID, References **NA, DC.WELDINSP.WELDINSPECT.R, 195.228(a) (195.228(b), 195.234)** (also presented in: DC.WELDINSP)
Question Text *Do records indicate welds are inspected to ensure compliance with the requirements of 195.228?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**
160. Question Result, ID, References **NA, DC.WELDINSP.WELDINSPECT.O, 195.228(a) (195.228(b), 195.234)** (also presented in: DC.WELDINSP)
Question Text *Are welds being inspected to ensure compliance with the requirements of 195.228?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**
161. Question Result, ID, References **NA, DC.WELDINSP.WELDNDR.T, 195.234(a) (195.234(b), 195.234(c))** (also presented in: DC.WELDINSP)
Question Text *Do records indicate adequate nondestructive testing and determination of standards of acceptability?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**
162. Question Result, ID, References **NA, DC.WELDINSP.WELDNDR.O, 195.234(a) (195.234(b), 195.234(c))** (also presented in: DC.WELDINSP)
Question Text *Are NDT activities performed in accordance with approved processes?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**
163. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDR.T, 195.234(d) (195.266(a))** (also presented in: DC.WELDINSP)
Question Text *Do records demonstrate at least 10% of all welds that are made by each welder during each welding day are nondestructively tested over the entire circumference of the welds or that more welds are tested per the operator's own procedures?*
Assets Covered **Crude - Butane Standard**
Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**

164. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTLOCATE.R, 195.234(e) (195.266(a))** (also presented in: DC.WELDINSP)
 Question Text *Do records demonstrate all girth welds installed each day in selected locations specified in 195.234(e) are nondestructively tested over their entire circumference?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**
165. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTUSED.R, 195.234(f) (195.266(a))** (also presented in: DC.WELDINSP)
 Question Text *Do records demonstrate that when installing used pipe, 100% of the old girth welds are nondestructively tested?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**
166. Question Result, ID, References **NA, DC.WELDINSP.GIRTHWELDNDTTIEIN.R, 195.234(g) (195.266(a))** (also presented in: DC.WELDINSP)
 Question Text *Do records demonstrate 100% of the girth welds have been nondestructively tested at selected pipe tie-ins?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such activity/condition was observed during the inspection. No new construction during the audit time period.**

FS.PS: Pump Stations

167. Question Result, ID, References **Sat, MO.LMOPP.PRESSREGTEST.R, 195.404(c) (195.428(a))** (also presented in: MO.LMOPP)
 Question Text *Do records indicate inspection and testing of each overpressure safety device on its non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Reviewed MAXIMO reports - for pig receiver & launcher - BP run dry traps now - closed trap 2022 - 2025 Crude & Butane**
168. Question Result, ID, References **Sat, MO.LMOPP.PRESSREGTESTHVL.R, 195.404(c) (195.428(a))** (also presented in: MO.LMOPP)
 Question Text *Do records indicate inspection and testing of each overpressure safety device on HVL pipelines at intervals not to exceed 7.5 months, but at least twice each calendar year?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **Staff reviewed overpressure protection device inspection records for the inspection time-frame via BP's online documentation.**
169. Question Result, ID, References **NA, MO.LMOPP.PRESSREGTEST.O, 195.428(a)** (also presented in: MO.LMOPP)
 Question Text *Are inspections of overpressure safety devices adequate (including HVL lines)?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
170. Question Result, ID, References **NA, MO.LMOPP.LAUNCHRECVRELIEF.O, 195.426** (also presented in: MO.LMOPP)
 Question Text *Are launchers and receivers equipped with relief devices?*
 Assets Covered **Crude - Butane Standard**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

FS.VA: Valves

171. Question Result, ID, References **Sat, MO.LM.VALVEMAIN.T.R, 195.404(c) (195.420(a), 195.420(b))** (also presented in: MO.LM)
 Question Text *Do records indicate each mainline valve was inspected as required?*
 Assets Covered **Crude - Butane Standard**

Result Notes Reviewed all mainline Valve records (inspected 2x per. year) - 2022- 2024 - staff observed that no dates were exceeded.

172. Question Result, ID, References Sat, MO.LM.VALVEMAIN.T.O, 195.420(a) (195.420(c)) (also presented in: MO.LM)

Question Text *Do the pipeline system valves appear to be in good working order and are they protected from unauthorized operation?*

Assets Covered Crude - Butane Standard

Result Notes Staff noted that all observed valves were adequately protected from unauthorized operation and appeared to be in good working order.

PD.PA: Public Awareness

173. Question Result, ID, References Sat, EP.ERL.LIAISON.R, 195.402(a) (195.402(c)(12), 195.440(c), API RP 1162 Section 4.4 (1st Edition)) (also presented in: EP.ERL)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?*

Assets Covered Crude - Butane Standard

Result Notes BP utilizes PARADIGM for excavator liaison and use EMA Program - for liaison with emergency responders.

PD.RW: ROW Markers, Patrols, Monitoring

174. Question Result, ID, References Sat, MO.RW.PATROL.R, 195.412(a) (195.412(b)) (also presented in: MO.RW)

Question Text *Do records indicate ROW surface conditions and crossings under navigable waterways were inspected, and reporting and appropriate mitigation performed?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed Master Pilot Report for crude & butane pipeline systems 2023-2024.

Reviewed weekly Ground Patrols for crude & butane pipeline systems 2022-2024.

175. Question Result, ID, References Sat, MO.RW.ROWCONDITION.O, 195.412(a) (also presented in: MO.RW)

Question Text *Are the ROW conditions acceptable for the type of patrolling used?*

Assets Covered Crude - Butane Standard

Result Notes Staff observed that all ROW markers encountered during the field portion of the audit were adequately maintained.

176. Question Result, ID, References Sat, MO.RW.ROWMARKER.O, 195.410(a) (195.410(b), 195.410(c)) (also presented in: MO.RW)

Question Text *Are line markers placed and maintained as required?*

Assets Covered Crude - Butane Standard

Result Notes Staff observed that all ROW markers encountered during the field portion of the audit were adequately placed and with the proper content, and in some cases with QR codes that take callers to more detailed information.

PD.SN: Facilities Signage and Security

177. Question Result, ID, References Sat, FS.FG.FACPROTECT.O, 195.436 (also presented in: FS.FG)

Question Text *Are facilities adequately protected from vandalism and unauthorized entry?*

Assets Covered Crude - Butane Standard

Result Notes Staff was able to verify adequate security and had a discussion with qualified personnel about security history of the Crude & Butane pipeline segments with no issues found.

178. Question Result, ID, References Sat, FS.FG.IGNITION.O, 195.438 (also presented in: FS.FG)

Question Text *Is there signage that prohibits smoking and open flames around pump stations, launchers and receivers, breakout tank areas, or other applicable facilities?*

Assets Covered Crude - Butane Standard

Result Notes Staff noted all signage was readable and contained the required information, including working emergency phone contacts and in some cases QR codes that takes callers to more detailed information.

179. Question Result, ID, References NA, FS.FG.SIGNAGE.O, 195.434 (also presented in: FS.FG)

Question Text *Are there operator signs around each pumping station, breakout tank area, and other applicable facilities?*

Assets Covered Crude - Butane Standard

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

TD.CP: External Corrosion - Cathodic Protection

180. Question Result, ID, References Sat, TQ.QU.CORROSIONSUPERVISE.R, 195.555 (195.507(a), 195.507(b)) (also presented in: TQ.QU)

Question Text *Is qualification of supervisors in corrosion control procedures documented?*

Assets Covered Crude - Butane Standard

Result Notes **Reviewed the following supervisor qualifications for Brian Stone:**

NACE Certificate - dated December 31, 2025 - Cert. No. 27908

NACE CP2 - Cathodic Protection Certified Technician - September 30, 2025 - Cert. No. 14342

NACE Internal Corrosion Technologist - Sept 30, 2025 - Cert No. 14342

TD.CPMONITOR: External Corrosion - Cathodic Protection Monitoring

181. Question Result, ID, References NA, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPEXPOSED)

Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

No deficiencies found for any of the years in the inspection time-frame.

182. Question Result, ID, References Sat, TD.CP.MAPRECORD.R, 195.589(a) (195.589(b)) (also presented in: TD.CP)

Question Text *Do maps and or records document cathodic protection system appurtenances that have been installed on pipelines that have been constructed, relocated, replaced, or otherwise changed or been converted to hazardous liquid service?*

Assets Covered Crude - Butane Standard

Result Notes Reviewed maps and records for crude & butane pipelines with no issues identified.

TD.CPEXPOSED: External Corrosion - Exposed Pipe

183. Question Result, ID, References NA, TD.CP.DEFICIENCY.R, 195.589(c) (195.573(e)) (also presented in: TD.CP, TD.CPMONITOR)

Question Text *Do records document adequate operator actions taken to correct any identified deficiencies in corrosion control?*

Assets Covered Crude - Butane Standard

Result Notes No such activity/condition was observed during the inspection.

No deficiencies found for any of the years in the inspection time-frame.

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.