

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 17, 1998

Mr. Les Owen  
British Petroleum Exploration (Alaska)  
BP Pipelines  
900 East Benson Boulevard  
MB 11-5  
Anchorage, Alaska 99508

**CPF NO. 58701M**

Dear Mr. Owen:

On November 18 and 19, 1997, a representative of the Western Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an inspection of your Milne Point Pipeline. The inspection also included examination of operating and maintenance procedures and records related to this pipeline.

As a result of the inspection, it appears that you have committed a probable violation as noted below of the pipeline safety regulations, Title 49, Code of Federal Regulations (CFR), Part 195. The following item is noted as a probable violation:

1. **§195.402(c)(3) requires procedures for operating, maintaining and repairing the pipeline system in accordance with each of the requirements of subpart F to be included in the operator's pipeline manuals.**

The pipeline repair procedures in BP's Milne Point Maintenance Manual are inadequate in the following ways:

- a. On page 12 under "Gouges and Grooves", the procedures should specify how gouges and grooves having a depth greater than 12½% of the nominal wall thickness will be repaired, or refer to a section of the manual where repair options for this condition are discussed.
- b. On page 13 under "Localized Corrosion", the procedures should specify how corrosion in the girth weld or longitudinal area will be repaired, or refer to a section of the manual where repair options for this condition are discussed.

- c. On page 16 under "Full-Wrap (Longitudinal Butt Weld)", a discussion describing what a full-wrap is should be included to distinguish this option from a split sleeve.
- d. On page 16 under "Full-Wrap (Longitudinal Butt Weld)", the procedure states that "Extensive pitting that cannot be covered with a 6 inch x 6 inch patch shall be repaired ...". This statement implies that a patch repair is acceptable if the pitting can be covered with a 6 inch x 6 inch patch. This is contrary to the statement on page 15 which reads "Milne Point has no pipe grade other than X65; therefore, patching is not permitted."
- e. On page 16 under "Full-Wrap (Longitudinal Butt Weld)", limits on grinding should be specified to ensure the wall thickness of the pipe is not reduced to an unsafe level when removing gouges, grooves, arc burns and notches.
- f. On page 17 under "Split Sleeves", a discussion of criteria to be used when determining when split sleeves will be installed for reinforcement only, versus for pressure containment, should be included.
- g. On page 17 under "Split Sleeves", limits on grinding should be specified to ensure the wall thickness of the pipe is not reduced to an unsafe level when removing gouges, grooves, arc burns and notches.
- h. A description of how far beyond the limits of the defect a repair sleeve must extend should be included in the appropriate sections.

As provided in 49 CFR §190.237, this Notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 CFR §190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this Notice. If you do not wish to contest this Notice of Amendment, you may provide your revised procedures within 30 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 CFR §190.237.

When appropriate procedures have been prepared, submit them to Director, Office of Pipeline Safety, Research and Special Programs Administration, Western Region, 12600 W. Colfax Avenue, Suite A-250, Lakewood, Colorado 80215.

Please refer to **CPF NO. 58701M** in any correspondence on this matter.

Sincerely,

Edward J. Ondak  
Director

Enclosure

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