



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

VIA FEDERAL EXPRESS AND FACSIMILE TO: (907) 564-5000

April 27, 2007

Mike Utsler
Senior Vice President & Greater
Prudhoe Bay Performance Unit Leader
BP Exploration (Alaska), Inc.
900 E. Benson Blvd.
Anchorage, AK 99508

**RE: CPF #5-2006-5015H
Amendment No. 3 to Corrective Action Order**

Dear Mr. Utsler:

Enclosed is Amendment No. 3 to the March 15, 2006 Corrective Action Order (CAO) issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It requires BP Exploration (Alaska) Inc. (BP) to take certain additional corrective actions with respect to the Prudhoe Bay Western Operating Area, Eastern Operating Area, Lisburne, and GHX hazardous liquid pipeline facilities BP operates. Service is being made by Federal Express and facsimile. Your receipt of this Corrective Action Order Amendment constitutes service of the document under 49 C.F.R. §190.5. The terms and conditions of this Corrective Action Order Amendment are effective upon receipt.

Sincerely,

James Reynolds
Pipeline Compliance Registry
Office of Pipeline Safety

Enclosure

cc: Chris Hoidal, P.E., Director, Western Region, PHMSA

**DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, DC 20590**

In the Matter of)	
BP Exploration (Alaska) Inc.,)	CPF No. 5-2006-5015H
Respondent)	
)	

AMENDMENT No. 3 TO CORRECTIVE ACTION ORDER

Background and Purpose

On March 15, 2006, under authority of 49 U.S.C. §60112, the Associate Administrator for Pipeline Safety, Pipeline and Hazardous Materials Safety Administration (“PHMSA”), issued a Corrective Action Order (“CAO”) finding that the continued operation of three hazardous liquid pipelines BP Exploration (Alaska), Inc. (“BP”) operates—the Prudhoe Bay Western Operating Area (“WOA”), Eastern Operating Area (“EOA”), and Lisburne pipelines (collectively, “Prudhoe Bay Pipelines”) would be hazardous to life, property, and the environment. PHMSA issued the CAO in response to a failure on or about March 2, 2006, on the WOA pipeline operated by BP that resulted in a spill of an estimated 201,000 gallons of crude oil. The CAO set forth preliminary findings based on PHMSA’s initial investigation of the pipeline failure and required, among other actions, that BP perform certain maintenance pigging (i.e., “cleaning pigging”) and internal in-line inspections (i.e., “smart pigging”) of the Prudhoe Bay Pipelines.

The Associate Administrator issued Amendment No. 1 to the CAO on July 20, 2006, based on the finding that the Prudhoe Bay Pipelines continued to pose a hazard to life, property, and the environment. Amendment No. 1 set forth additional preliminary findings based on PHMSA’s oversight of BP’s actions pursuant to the CAO and PHMSA’s continuing investigation of the condition of the Prudhoe Bay Pipelines. PHMSA required, among other measures, that BP perform additional inspections and assessments of the condition of the Prudhoe Bay Pipelines and develop and implement plans for addressing new and ongoing safety risks associated with its failure to timely complete the cleaning and in-line inspection actions required by Items 3, 4, and 7 of the CAO.

The Acting Associate Administrator issued Amendment No. 2 on August 10, 2006, again based on the finding that the Prudhoe Bay Pipelines continued to pose a hazard to life, property, and the environment, following failures on a segment of the EOA pipeline that resulted in a spill of crude oil on or about August 5, 2006. Amendment No. 2 set forth additional preliminary findings based on the August 2006 failures; PHMSA's oversight of BP's actions pursuant to the CAO; and PHMSA's continuing investigation of the condition of the Prudhoe Bay Pipelines. PHMSA required, among other measures, that BP submit additional information and perform additional monitoring and testing of its Prudhoe Bay Pipelines and its GHX Bypass Pipeline ("GHX" or "GHX21"), which BP used to bypass a portion of the WOA pipeline after the March 2006 spill.

Since August 10, 2006, BP has completed the initial assessment of the Prudhoe Bay Pipelines and taken other actions required by the CAO, Amendment No. 1, and Amendment No. 2 (collectively, "the Orders" or "the CAO, as amended"). PHMSA monitored BP's operations and compliance with the Orders throughout this period, and PHMSA and BP have engaged in ongoing discussions of BP's plans for continued operation of its North Slope facilities, including plans to rebuild large segments of the Prudhoe Bay Pipeline system and other measures for enhancing the long-term safety and integrity of its operations. While PHMSA discusses these measures with BP, the agency deems it necessary to issue this Amendment No. 3 in order to address immediate safety issues involving the Prudhoe Bay Pipelines.

Additional Preliminary Findings

Results of Smart Pig Inspections and Other Testing on WOA and EOA

1. Since the issuance of Amendment No. 2, BP has completed a series of inspections and analyses of its pipelines, including, but not limited to, the initial smart pig inspection of the remaining in-service segments of the EOA and WOA pipelines required by Items 3 and 7 of the Orders. Specifically, BP completed smart pigging of the Flow Station 1-Skid 50 ("FS1-Skid 50") segment of the EOA on October 18, 2006, and of the Gathering Center 1 to Skid 50 ("GC1-Skid 50") segment of the WOA on November 12, 2006. PHMSA requested the smart pig data for these inspections and received BP's preliminary data for the EOA on November 7, 2006 and for the WOA on November 17, 2006. PHMSA and its expert consultants reviewed smart pig data provided by BP and validated a sampling of the data. The BP reports noted corrosion in several locations on each of the segments inspected, but on a level less severe than that found on the EOA and WOA segments now out of service. In each case, the degree of corrosion fell below the mandatory repair thresholds under the 49 C.F.R. Part 195 repair criteria specified in the Orders.
2. PHMSA, through a series of formal information requests, sought information from BP concerning the mechanism(s) of corrosion on the WOA and EOA. Through these requests, PHMSA obtained the results of BP's extensive metallurgical, microbiological and other testing performed on the WOA and

requested that BP perform similar testing on the EOA. On March 30, 2007, PHMSA received BP's final report, conducted by third-party corrosion experts, on the cause of corrosion that led to the March, 2006 failure of the WOA. BP has not submitted a final report on the August, 2006 EOA pipeline failure. BP has opined that the primary cause of the March and August 2006 failures was aggressive microbiologically induced corrosion ("MIC"). BP has indicated that MIC was promoted by the particular operating and internal characteristics of the WOA and EOA pipelines including, but not limited to, low crude oil flow velocities; the corrosivity of the materials transported; the presence of water and sediments; an ineffective corrosion inhibitor program; and a lack of maintenance pigging. PHMSA's review of BP's March 30, 2007 report is ongoing.

3. The information PHMSA has received to date from BP on its microbiological and metallurgical testing indicates consistency with PHMSA's earlier preliminary findings about the probable corrosion mechanisms on the WOA and EOA pipelines.
4. In addition to PHMSA's review of the information above, PHMSA has reviewed testing and historical information BP provided as required by the Orders and formal information requests. PHMSA reviewed information on current and historical operational characteristics of the WOA and EOA, including: crude oil flow rates; water content; and the history of upset conditions during which water was released into the WOA and EOA pipelines. PHMSA also reviewed historical smart pig records from the 1998 internal inspection of the WOA pipeline; Corrosion Rate Monitoring (CRM) data for the period leading up to the March 2006 failure; BP's limited historical maintenance data; and a variety of external examination data BP collected as required by Items 24 and 31 of the Orders, including the results of extensive Ultrasound Testing (UT) of the WOA and EOA. This information has contributed to a better understanding of the history and condition of BP's pipelines and helped tailor necessary corrective actions.
5. The failure history of the WOA and EOA; BP's contentions that corrosion is aggressive; and the lack of scientific certainty regarding the mechanisms and rates of corrosion all support requiring BP to take additional measures to monitor and control corrosion on the operational segments of the Prudhoe Bay Pipelines until these segments are removed from service. Current conditions present the risk that corrosion, without such additional measures, could continue to reduce the wall thickness of the operational segments of the Prudhoe Bay Pipelines, even with the ongoing inspection program required by the Orders.

System Rebuilding

6. BP is in the process of engineering and building a renewed pipeline system designed to replace major segments of the Prudhoe Bay Pipelines. BP has provided PHMSA with information about its plans and timetable in response to Items 17 and 23 of the Orders and a follow-up information request served December 7, 2006.

7. On January 10, 2007, BP provided PHMSA a plan entitled, "BP Alaska Pipeline Review" ("Rebuilding Plan") for replacement of sixteen (16) miles of the WOA and EOA pipelines (from GC2 to Skid 50 and from FS2 to Skid 50, respectively) as well as the pipeline from Skid 50 to PS1, with a newly configured pipeline system. For the purposes of this Amendment, the foregoing description of the rebuilding plan is hereinafter referred to as the "scope."
8. The Rebuilding Plan incorporates five principal elements or features designed to reduce the risk of future corrosion and prevent oil spills:
 - a. The pipelines will be constructed of smaller diameter pipes to be operated at higher velocity than the existing EOA and WOA;
 - b. The pipelines will be constructed in accordance with the requirements of 49 C.F.R. Part 195. Accordingly, the pipelines will be configured to accommodate smart pigs (and cleaning pigs) and will include permanent pig launchers and receivers;
 - c. The new system will be equipped with state-of-the-art leak detection systems, including a LEOS external leak detection and location system; new ultrasonic and turbine flow meters; and enhanced ATMOS leak detection software;
 - d. The new system will feature portals for continuous direct injection of corrosion inhibitors on each segment of the new pipelines;
 - e. The new system features ergonomic elements designed to accommodate and facilitate routine maintenance activities.

For purposes of this Amendment, the foregoing are hereinafter referred to as the "material design elements."

9. The general system design outlined in the Rebuilding Plan meets the applicable provisions of PHMSA's design regulations set forth in 49 C.F.R. Part 195, Subpart C. The design of the new system should account for many of the known risks associated with BP's North Slope pipeline operations and risks understood from PHMSA's current understanding of corrosion on the existing EOA and WOA pipelines. In addition, improved risk assessment in the future should provide additional protection against known and unforeseen risks. Accordingly, the intrinsic safety benefits of implementing the Rebuilding Plan exceed those that could be achieved solely through long-term enhanced maintenance and monitoring of the existing EOA and WOA.

10. The Rebuilding Plan includes a timeline for completion of design, engineering, construction, and other pipeline rebuilding milestones and establishes start-up dates for each new segment of EOA and WOA, as follows:

Pipeline Segment	Start-up Date
WOA GC2 to GC1:	March 31, 2008
EOA FS1 to Skid 50:	June 30, 2008
EOA FS2 to FS1:	October 31, 2008
WOA GC1 to Skid 50 and Skid 50 to PS1:	December 31, 2008

11. BP's ability to meet its Rebuilding Plan schedule will depend on BP's diligence; North Slope weather conditions; and the length of the winter construction season, among other factors. BP began construction of the WOA GC2–GC1 segment (also known as “OT–21”) and the EOA FS1–Skid 50 segment in January, 2007. As of April, 2007, the winter construction season ended. During the winter 2007 construction season, BP completed the installation of line pipe for the WOA GC2–GC1 and EOA FS1–Skid 50 segments. Although the line pipe installation has ceased for the year, BP will continue construction of the pipeline facilities associated with these segments on a year-round basis. At the time of this Amendment, the Rebuilding Plan was on schedule.

GHX Bypass Pipeline

12. After the March 2, 2006 spill, BP ceased operation of the GC2–GC1 WOA segment. The company temporarily bypassed this segment by converting the nearby GHX from a flow line to an oil transportation pipeline. The GHX transports processed crude oil from GC2 to the operational WOA GC1–Skid 50 segment. The GHX is approximately 3.5 miles in length and was constructed in 1991 from 24-inch nominal diameter, X-65 Grade, 0.500-inch wall-thickness pipe. On September 8, 2006, pursuant to the requirements of Item 33 of the Orders, BP submitted information and plans regarding future maintenance and inspection of the GHX.
13. Pursuant to Item 33, BP reports that it is cleaning the GHX on a monthly basis using maintenance pigs, that it injects corrosion inhibitor directly into the pipeline, and that the company performed an internal inspection of the GHX on or about October 21, 2006, using a high-resolution magnetic flux leakage in-line inspection (MFL) tool.
14. PHMSA has determined from information received by BP, pursuant to Item 33, that the combination of risk factors affecting the GHX, specifically including: the nature and properties of the materials transported in the line; the line's history of past corrosion problems; and the risk of continued corrosion pose an undue risk to the integrity of the pipeline. Additional monitoring of the GHX is necessary to minimize the risk of a failure on that line.

Pipeline Information Integration

15. Since the August 10, 2006 failure, BP has been performing a variety of corrosion monitoring and mitigation activities on its Prudhoe Bay Pipelines and the GHX. While BP continues to collect a large amount of data from these activities, it has not yet developed an adequate process for integration of testing data or criteria for deciding whether to take action based on testing data.

De-oiling and Abandonment of WOA and EOA

16. Pursuant to the Orders, BP drained most of the oil from the de-activated or “shut-in” EOA FS2–FS1 and WOA GC2–GC1 segments. By draining most of the oil, BP has reduced the risk and potential extent of further spills on these segments. Nevertheless, these segments still contain substantial quantities of residual crude oil and other materials, particularly in the low spots along the pipelines. The operational EOA and WOA segments will also be de-activated when the new pipelines are completed and would present similar risks unless all crude oil and other materials are removed. In the current circumstances, it is necessary to complete the de-oiling and abandonment or removal of all segments of the EOA and WOA to mitigate the risk of continuing internal corrosion and spills.

Operations Management

17. Beyond the technical requirements imposed by this Amendment, maintaining the integrity of the BP Prudhoe Bay operations over time requires fundamental changes in BP’s risk assessment practices, organizational structure, information flow, and safety decision-making processes that transcend BP’s Prudhoe Bay Pipeline operations. PHMSA takes notice of findings of recent reports prepared for BP America, BP’s corporate parent. BP America has informed PHMSA of recommendations to reform the company’s management systems, based on findings that certain deficiencies in risk assessment practices, organizational structure, design, accountability, information flow, and corporate culture contributed to the pipeline failures on the North Slope. A report by The U.S. Chemical Safety and Hazard Investigation Board made similar recommendations to BP America.
18. BP has informed PHMSA that it is implementing several major new programs to address process safety and integrity management concerns, including implementation of an Operations Management System (“OMS”) focused on improving its working environment and culture, infrastructure, processes, and overall safety performance.
19. PHMSA is reviewing and will continue to monitor the development and implementation of BP’s OMS system.

**DETERMINATION OF NECESSITY FOR AMENDMENT OF CORRECTIVE
ACTION ORDER AND RIGHT TO A HEARING**

Section 60112 of Title 49, United States Code, provides for the issuance of Corrective Action Orders (and amendments), after reasonable notice and the opportunity for a hearing, when PHMSA determines that a pipeline facility is, or would be, hazardous. Corrective action may include the suspended or restricted use of a pipeline facility, physical inspection, testing, repair, replacement or other action as appropriate. The standards governing issuance of Corrective Action Orders are set forth both in the above-referenced statute and 49 C.F.R. §190.233, a copy of which is enclosed.

Section 60112(e) and the regulations promulgated thereunder provide for the issuance of a Corrective Action Order without prior opportunity for notice and a hearing upon a finding that a failure to issue the Order expeditiously will result in likely serious harm to life, property or the environment. In such cases, an opportunity for a hearing will be provided as soon as practicable after the issuance of the Order.

After evaluating the foregoing additional preliminary findings of fact, I find that continued operation of the Prudhoe Bay Pipelines and the GHX Bypass Pipeline, without additional corrective measures, will be hazardous to life, property and the environment. Additionally, after considering the hazardousness of the product the pipelines transport; the March and August, 2006 pipeline failures; the inadequacy of the leak detection system; the number, type, and severity of anomalies discovered on the pipelines; the continuing presence of water in the pipelines; the current information regarding corrosion of the pipelines; the potential for ongoing corrosion; and the proximity of all of the pipelines to environmentally sensitive areas, I find that failure to expeditiously issue this Order requiring immediate corrective action would likely result in serious harm to life, property, or the environment.

Accordingly, this Corrective Action Order mandating immediate corrective action is issued without prior notice and opportunity for a hearing. The terms and conditions of this order are effective upon receipt.

Within ten (10) days of receipt of this Order, BP may request a hearing, to be held as soon as practicable, by notifying the Associate Administrator for Pipeline Safety in writing, delivered personally, by mail or by facsimile at (202) 366-4566. The hearing, if requested, will be held in Lakewood, Colorado or Washington, DC on a date that is mutually convenient to PHMSA and BP.

After receiving and analyzing additional data in the course of this investigation, PHMSA may identify additional measures that BP may need to take. In that event, to the extent it is consistent with safety considerations, BP will be notified of any additional measures required and amendment of this Order will be considered. The terms of the March 15, 2006 CAO and the additional terms added by Amendments No. 1, 2, and this Amendment, and subsequent amendment(s), if any, will remain in place for as long as the

Associate Administrator deems necessary to ensure the subject pipeline facilities are constructed and operated in a safe and environmentally sound manner.

This amendment does not suspend, eliminate, or alter the requirements of the March 15, 2006 CAO, the July 20, 2006 Amendment No. 1, or the August 10, 2006 Amendment No. 2, unless specifically provided herein.

Amendments to Required Corrective Action

Pursuant to 49 U.S.C. §60112, I hereby order BP to immediately take the following additional corrective actions with respect to BP's Prudhoe Bay Pipelines and the GHX bypass pipeline.

The following items are hereby added to the Orders:

Item 35. Rebuilding Plan and Schedule. BP shall submit monthly written reports to the Director, Western Region, detailing the status of activity under the Rebuilding Plan, including BP's progress in meeting the project schedule. If BP intends to change the scope of the Rebuilding Plan, any material design element, or the schedule set forth in the preliminary findings and BP's January 10, 2007 Rebuilding Plan, BP shall provide sixty (60) days notice to the Director, Western Region and a written justification of the reasons for any changes or delays.

Item 36. Pipeline Inspection and Corrosion Control. Until each pipeline segment is safely taken out of service, BP shall perform the activities specified below on each currently operational segment of the Prudhoe Bay Pipelines and the GHX, unless otherwise specified. BP shall also submit, in writing, the records, reports, and information specified below to the Director, Western Region:

- a. Within fourteen (14) days of receipt of this Order, submit a list describing the type, and location on the pipeline, of all coupons and Electrical Resistance ("ER") probes.
- b. Perform quarterly testing of all coupons and ER probes. Submit a monthly data report providing the test locations, results, and description of any corrosion or corrosion trends.
- c. Within fourteen (14) days of receipt of this Order, submit a list of the location on the pipeline of all corrosion rate monitoring ("CRM") sites. Perform quarterly monitoring of all CRM. Submit a monthly report describing any increases in wall loss and the rate of wall loss as compared to prior readings.
- d. Within thirty (30) days of receipt of this Order perform ultrasonic testing ("UT") of the top-ten (10) wall loss features for each of the currently operational EOA, WOA, and GHX pipelines and report the results to PHMSA.

- i. Quarterly thereafter, perform ultrasonic testing (“UT”) of the top-ten (10) wall loss features for each of the currently operational EOA, WOA, and GHX pipelines.
 - ii. During each quarter-year, submit monthly data reports describing any increases in wall loss and the rate of wall loss as compared to prior readings.
- e. Perform daily average measurements of basic sediment and water (“BS&W”) in the pipeline at the following locations: FS1, FS2, GC1, GC2, FS3, GC3, and LPC. Provide a monthly data report of the daily average readings for each specified location. Within thirty (30) days of receipt of this Order, provide a report describing the sampling process(es) used and what steps BP is taking to ensure that the samples are representative of actual BS&W levels.
- f. Perform an internal inspection using a calibrated smart pig of the following segments of the Prudhoe Pay Pipelines and the GHX by the dates shown below:

<u>Pipeline Segment</u>	<u>Completion Date</u>
FS1–Skid 50 (EOA)	October 19, 2007
GHX	October 21, 2007
GC1–Skid 50 (WOA)	November 13, 2007

Repeat the smart pig inspections of each segment within twelve (12) months after the dates shown above and within twelve (12) months thereafter, until such segments are no longer in operation. Each pig run must provide an amount and quality of data sufficient, in the determination of the Director, Western Region, to adequately determine the condition of the pipeline. For the purposes of this Order, and at a minimum, a set of smart pig data must cover at least ninety five percent (95%) of the pipeline segment. This 12-month interval smart pigging requirement supersedes the maximum 5-year interval imposed under Items 3, 7, and 33 of the Orders, but does not affect any other requirements under these Items. After each smart pig run, provide the following:

- i. Within twenty four (24) hours provide a report of whether a complete set of smart pig data was collected.
- ii. Within fourteen (14) days provide a preliminary report of the smart pig run and, within ninety (90) days, a comprehensive report detailing the condition of the segment of pipeline tested.
- iii. BP shall repair all defects and conditions, as defined under 49 C.F.R. §195.452(h)(4)(i) through (iv), discovered on the operational segments of WOA, EOA, and the GHX, on a schedule that, at a minimum, comports with the deadlines set out in 49 C.F.R. §195.452(h)(4) and in a manner consistent with ASME B-31.4. BP shall also, within six (6) months of each smart pig run, investigate all sections of pipe indicated by smart pig data to

have experienced wall loss of sixty percent (60%) or more, regardless of the dimensions of the anomaly, and repair all sections of pipe verified to contain wall loss of sixty percent (60%) or more. Submit monthly reports documenting each anomaly investigated and resulting repairs made with respect to this Item 36. This Item 36 supersedes Items 29 and 32 of the Orders.

- g. Analyze all available pigging returns and provide a monthly report of the data produced and a summary of the results.
- h. Perform monthly maintenance pigging of the GHX Bypass Line.
- i. Within thirty (30) days of receipt of this Order, submit a report that describes the process by which BP integrates pipeline testing results; the intervention criteria BP uses to determine whether action is necessary in response to testing results; and what action(s) will be taken. The report shall also include the name, title, and contact information of the persons(s) responsible for collecting, analyzing, and reporting to PHMSA the information required above, as well as the person(s) responsible for ensuring that appropriate action is taken when an issue has been identified.

Item 37. De-Oiling and Abandonment. BP shall complete de-oiling of the currently operational GC1–Skid 50 segment of WOA and the FS1–Skid 50 segment of EOA within ninety (90) days of the shut down of those pipeline segments in preparation for the completion of pipeline rebuilding activities. In accordance with the schedule set forth below, BP shall render safe all existing segments of EOA and WOA, in accordance with the provisions for abandonment described in 49 C.F.R. §195.402(c)(10), and by removing any remaining hydrocarbons, sludge, and other solids from the pipelines:

<u>Existing Pipeline Segment</u>	<u>Completion Date</u>
WOA GC2–GC1:	December 31, 2007
EOA FS2–FS1:	December 31, 2008
EOA FS1–Skid 50:	September 30, 2009
WOA GC1–Skid 50 and Skid 50–PS1:	September 30, 2009

BP must also submit quarterly written status reports describing the company’s progress in complying with this Item.

Item 38. Implementation Costs. BP shall maintain documentation of the safety improvement costs associated with fulfilling the Orders and all Amendments and submit to the Western Region Director. Costs shall be reported in two categories: 1). Total cost associated with preparation/revision of plans, procedures, studies, and analyses; and (2) total cost associated with replacements additions and other changes to pipeline infrastructure. Within one (1) month of a request for this documentation by the Director, Western Region, BP shall submit a report of the costs described above.

Additional Terms

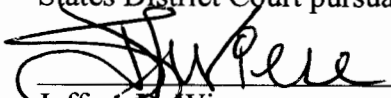
The actions this Order requires are in addition to, and do not waive or modify, any other requirements applicable to BP or any of its pipeline systems or operations under any provision of federal, state, or local law, or any other order issued to BP under authority of 49 U.S.C §60101, *et seq.* With respect to all actions undertaken pursuant to this Order, BP, its agents, and employees shall be responsible for compliance with all applicable federal, state, and local laws, regulations and permits. This Order shall not be construed to constitute a permit, or a modification of any permit, issued under any federal, state, or local law or regulation.

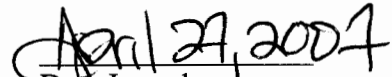
In addition to any other actions specifically required under the terms of this Order, it is BP's continuing responsibility to design, construct, operate and maintain all of its pipeline facilities subject to 49 U.S.C. §60101, *et seq.*, and the terms hereof in a manner that provides reasonable protection to life, property, and the environment.

The Director, Western Region, PHMSA may grant a written extension of time for compliance with any of the terms of this Order for good cause. Any request for an extension shall be in writing and detail the basis for such request.

BP may appeal any decision of the Director, Western Region, PHMSA, to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator are final.

In accordance with 49 U.S.C. §60122 and 49 C.F.R. §190.223, failure to comply with this Order may result in the assessment of administrative civil penalties of not more than \$100,000 per violation per day and in referral to the Attorney General of the United States for appropriate relief, including the imposition of civil judicial penalties, in United States District Court pursuant to 49 U.S.C. §60120.


Jeffrey D. Wiese
Acting Associate Administrator
for Pipeline Safety


Date Issued