LETTER OF CONCERN

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. 58705C

Dear Mr. Owen:

On November 20, 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 Endicott Pipeline system. The inspection also included examination of operating and maintenance procedures and records related to this pipeline.

The facilities and records reviewed during this inspection revealed areas on your Endicott Pipeline system that are cause for concern.

1. **§195.416(I) requires each operator to clean, coat with a material suitable for the prevention of atmospheric corrosion and maintain this protection for, each component in its pipeline system that is exposed to the atmosphere.**

   BP has determined they have areas of external corrosion on the pipeline. BP believes the cause of this corrosion is from water seeping through the insulation at the 'weldpack' seams and becoming trapped against the pipe. BP has run an internal inspection tool through the pipeline and has verbally indicated they plan to inspect, monitor and/or repair all locations where the internal inspection tool has indicated significant corrosion. However, at the time of the inspection, BP was unable to specify their plans for addressing each of the anomalies indicated by the internal inspection tool.

To help ensure all areas of corrosion are identified and inspected, we recommend that BP develop a written plan to address the external corrosion found on their Endicott Pipeline. The plan should include at least the following information:

a. Areas of corrosion identified by milepost or other appropriate method.

b. For each area of corrosion, indication of whether that area will be visually inspected, repaired, or monitored periodically.

c. Criteria to determine when to remove the insulation and inspect the corroded areas of the pipe.

d. Criteria to determine whether to repair the pipe or to simply suppress the active corrosion.

e. Methods to repair the pipe, when applicable.

f. Methods to suppress active corrosion, when applicable.

g. Methods to ensure the weldpack seams do not continue to allow moisture to be trapped against the pipe.

h. Plans for periodically reinspecting the pipeline for corrosion.

2. **§195.404(b)(1) requires that each operator maintain for at least three years daily operating records that indicate the discharge pressure at each pump station.**

BP does maintain records that indicate the discharge pressure at each pump station for at least three years, however, the records only indicate the pressure at half hour intervals. Previous interpretations of this rule require the discharge pressure to be recorded at intervals frequent enough to collect the pressures attained during normal and abnormal conditions, such that the recorded data could be assembled to create a facsimile of the pressures that actually occurred, including the magnitude and time interval of all elevated pressures. In addition, the pressure is being recorded from a location downstream of a control valve that significantly reduces the pressure in the line. The pressure should be recorded from a location immediately downstream of the pump before any significant pressure drop can occur.

We recommend that BP record discharge pressures at intervals frequent enough to collect the pressures attained during normal and abnormal conditions, such that the recorded data could be assembled to create a facsimile of the pressures that actually occurred, including the magnitude and time interval of all elevated pressures.

We hope that you will consider these areas of concern and take action to further improve your present level of safety. If we can answer any questions or be of any help, please feel free to contact me at (303) 231-5701.

Sincerely,

Edward J. Ondak
Director

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