

Inspector and Operator Information

<b>Inspection ID</b> 8768	<b>Inspection Link</b> 8768	<b>Inspector - Lead</b> Anthony Dorrough	<b>Inspector - Assist</b>
<b>Operator</b> BP Pipelines North America	<b>Unit</b> BP Pipelines HQ	<b>OPID #</b> 31189	<b>Records Location - City &amp; State</b> 30 S Wacker Dr, Chicago, Ill 60606
<b>Inspection Start Date</b> 08-15-2024	<b>Inspection Exit Interview Date</b> 08-15-2024	<b>Engineer Submit Date</b> 08-16-2024	

Inspection Summary

You must include the following in your inspection summary:

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

Inspection Scope and Summary

The 2024 BP Pipelines annual review will focus on the questions listed in Form-A covering HQ programs for PA/Damage prevention, OQ , CRM which included the butane, crude and Ferndale gas lines.

Facilities visted and total AFOD = 2

Wed Aug 14 - Records review inspection prep

Thu Aug 15 - Inspection and exit interview using MS Teams

Summary of Significant Findings

There were BLANK findings from the inspection

Primary Operator contacts and/or participants

Jim Bruen DOT Team Leader-Programs

Jim Fraley DOT Compliance Advisor

Operator executive contact and mailing address for any official correspondence

Gerald Maret, VP, US Pipelines & Logistics

M.C. 9S 30S Wacker Drive, Chicago, Illinois 60606

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

<b>Satisfactory Responses</b> 19	<b>Satisfactory List</b> 1,3,9,13,14,16,17,18,24,25,26,27,28,29,30,31,32,37,	<b>Number of Unanswered Questions</b> 0	<b>Unanswered List</b>
<b>Unsatisfactory Responses</b> 0	<b>Unsatisfactory List</b>		
<b>Area of Concern Responses</b> 0	<b>Area of Concern List</b>		
<b>Not Applicable Responses</b> 20	<b>Not Applicable List</b> 4,5,6,7,8,10,12,15,19,20,21,22,23,35,39,40,41,42,43,44		
<b>Yes Responses</b> 1	<b>Yes List</b> 36,	<b>No Responses</b> 2	<b>No List</b> 34,38,
<b>Not Checked / Evaluated Responses</b> 0	<b>Not Checked / Evaluated List</b>		

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

- Crew Inspection History
- Facility Inspection History
- Scheduled Inspection History
- GAS System Operations History
- HL System Operations History
- ANNUAL REPORT: ACCURACY/TRENDS

<b>Question #1.</b> Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.	<b>1. Result</b> Satisfactory
<b>Question 1-a. Are Operator Manuals Up to Date?</b> WAC 480-93-180(2) / WAC 480-75-660(2) requires operators to provide manual updates to the UTC.	<b>1a. Result</b> Satisfactory
<b>Question 1-b. Are Operator Contacts Up to Date?</b> WAC 480-93-200(11) Requires operators to notify the UTC of changes to company contacts. HL does not have a corresponding rule.	<b>1b. Result</b> Satisfactory
<b>1. Notes</b> BP provides viewing of all of their separate manuals and updates via their Dark Web code-key access which allows for records to be reviewed without compromise.	

DAMAGE PREVENTION

<b>Question #2.</b> Review the following damage prevention items:		
<b>Q2. Is the damage prevention information in the annual report complete?</b> Yes.	<b>Q2.b. Is the annual report damages root cause information complete and accurate?</b> Yes.	<b>Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?</b> Yes. They use a process that involves root cause analysis.
<b>Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?</b> Yes. They use a process that involves root cause analysis.	<b>Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?</b> Yes.	<b>Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?</b> Yes.
<b>Q2.g. What is the number of damages resulting from mismarks?</b> [0] Zero	<b>Q2.h. What is the number of damages resulting from not locating within the time requirements?</b> [0] Zero	<b>Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?</b> Yes.
<b>Q2.j. Are mapping corrections timely and according to written procedures?</b> Yes. There were no mapping errors.	<b>Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?</b> Yes. They use a process that involves root cause analysis.	<b>Q2.L. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?</b> Yes.
<b>2. Notes</b> BP uses root cause analysis for any damages involving locating errors -- Zero errors since the last inspection.		

NPMS SUBMISSIONS/CHANGES

<b>Question #3.</b> For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?	<b>3. Result</b> Satisfactory
<b>3. Notes</b> BP submitted Mar 3, 2023	

INCIDENT/SRC/AOC REPORTS REVIEW

Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services	Number of Hits Tickets
No Damages records found																

**4. Notes**

There were no reportable incidents or trends identified.

**Q4: Federally reportable incidents**

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No Incident Notification records found									

**Question #5.**

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

**5. Result**  
Not Applicable

**5. Notes**

There were no accidents or damages identified.

**Question #6.**

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**Q6: Incident Reports**

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
No Incident Notification records found						

**6. Result**  
Not Applicable

**6. Notes**

There were no incidents or trends identified.

**Question #7.**

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**Q7: Report of SRCs**

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
No Incident Notification records found							

**7. Result**  
Not Applicable

**7. Notes**

There were no SRC's identified.

**Question #8.**

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Result**  
Not Applicable

**8. Notes**

There were no SRC's identified.

**O&M & EMERGENCY PROGRAMS**

**Question #9.**

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

**9. Result**  
Satisfactory

**9. Notes**

The O&M and OMER manuals for BP Cherry Point and Olympic Laterals were inspected 12/9 thru 12/11/2020, with no findings. Cherry Point O&M manuals are scheduled for inspection on 9/10/2024.

**Question #10.**

If changes to the O&M were made, are changes acceptable?

**10. Result**  
Not Applicable

**10. Notes**

No changes since last inspection. The last revision was on 5/6/2020.

**Question #11.**

Were emergency plans changed during the previous year?

**11. Result**

Satisfactory

**11. Notes**

**Question #12.**

Were any changes to emergency plans satisfactory?

**12. Result**

Not Applicable

**12. Notes**

No changes since last inspection. The last revision was on 5/6/2020.

**INTEGRITY MANAGEMENT PROGRAMS**

**Question #13**

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

**13. Result**  
Satisfactory

**13. Notes**

The TIMP is located in OMER procedure #P-192.901, last revised on 5/6/2020. with no changes since last inspection Dec 6, 2020. LIMP inspection of BP Cherry Point, and Olympic laterals Feb 16-19, 2021 with no findings.

**Question #14.**

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

**14. Result**  
Satisfactory

**14. Notes**

Per. IMP Annual Summary with previous years program and performance measures. LIMP inspection of BP Cherry Point, and Olympic laterals Feb 16-19, 2021 with no findings. Staff reviewed IMP Annual Summary for 2023.

**Question #15**

Are IMP program changes acceptable?

**15. Result**  
Not Applicable

**15. Notes**

The TIMP is located in OMER procedure #P-192.901, last revised on 5/6/2020. with no changes since last inspection Dec 6, 2020. LIMP inspection of BP Cherry Point, and Olympic laterals Feb 16-19, 2021 with no findings.

**Question #16**

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

**16. Results**  
Satisfactory

**16. Notes**

Staff reviewed IMP Annual Summary for 2023.

**Question #17**

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

**17. Results**  
Satisfactory

**17. Notes**

LIMP inspection of BP Cherry Point, and Olympic laterals Feb 16-19, 2021 with no findings.

**Question #18**

What assessment work is planned for the upcoming year?

**18. Results**  
Satisfactory

**18. Notes**

BP has assessment planned in 2025 & 2026 for gas pipelines and 2024 for the crude and butane pipelines.

**Question #19**

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

**19. Results**  
Not Applicable

**19. Notes**

Transmission Operator

**Question #20**

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

**20. Results**  
Not Applicable

**20. Notes**

Transmission Operator

**Question #21**

Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

**21. Results**  
Not Applicable

**21. Notes**

Transmission Operator

**Question #22**

**22. Results**

Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

Not Applicable

**22. Notes**  
Transmission Operator

**Question #23**  
What DIMP remediation work is anticipated for upcoming year?

**23. Results**  
Not Applicable

**23. Notes**  
Transmission Operator

## QO PROGRAM

**Question #24**  
Is the QO program up to date? Were there changes to the Operator Qualification (QO) program in the last year? If yes, please describe.

**24. Results**  
Satisfactory

**24. Notes**  
The UTC conducted a BP HQ QO inspection on BP and Ferndale Pipeline Systems on Wed Jun 28 2024. There were no issues noted from the inspection.

**Question #25**  
Are the QO plan updates satisfactory?

**25. Results**  
Satisfactory

**25. Notes**  
The UTC conducted a BP HQ QO inspection on BP and Ferndale Pipeline Systems on Wed Jun 28 2024. There were no issues noted from the inspection.

**Question #26**  
Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

**26. Results**  
Satisfactory

**26. Notes**  
The UTC conducted a BP HQ QO inspection on BP and Ferndale Pipeline Systems on Wed Jun 28 2024. There were no issues noted from the inspection. QOs for covered tasks were checked for a Cleaning Pig Installation on 16-inch pipeline in Ferndale. .

## PUBLIC AWARENESS PROGRAM

**Question #27**  
Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

**27. Results**  
Satisfactory

**27. Notes**  
The UTC conducted a BP HQ PA inspection on BP and Ferndale Pipeline Systems on Fri Jul 12 2024. There were no issues noted from the inspection

**Question #28**  
Are changes to the PA program satisfactory?

**28. Results**  
Satisfactory

**28. Notes**  
The UTC conducted a BP HQ PA inspection on BP and Ferndale Pipeline Systems on Fri Jul 12 2024. There were no issues noted from the inspection

## CONTROL ROOM PROGRAM

**Question #29**  
Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

**29. Results**  
Satisfactory

**29. Notes**  
A PHMSA CRM audit was conducted in 2020 in Tulsa OK. Any changes to the CRM will be based on results from audit.

**Question #30**  
Are the CRM program changes satisfactory?

**30. Results**  
Satisfactory

**30. Notes**  
The results of the 2021 PHMSA CRM audit was just completed in 2024 and is at this time being analyzed at BP.

## SAFETY MANAGEMENT SYSTEM API 1173

**Question #31**  
Is the operator developing and implementing an API 1173 Safety Management System?

**31. Results**  
Satisfactory

**31. Notes**  
Per. OMS-Operating Management System. BP hired an independent contractor to evaluate their new OMS system vs the API 1173 Standard with the results still being analyzed.

## INSPECTOR ASSESSMENT OF INSPECTION UNITS

**Question #32**  
Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

**32. Results**  
Satisfactory

**32. Notes**  
Staff feels current unit configuration to be adequate.

**Q32: List of current inspection units**

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	Operator - OPID	Unit ID	Date Created
BP Pipelines North America (3 Unit records)						
BP Cherry Point - Crude	Hazardous Liquid	Intrastate	Liquid	31189	BP Cherry Point - Crude	02-06-2019 10:50 AM
BP Pipelines HQ	Hazardous Liquid	Interstate	Liquid	31189	31189	07-01-2019 08:53 AM
BP Cherry Point - Butane	Hazardous Liquid	Intrastate	Liquid	31189	BP Cherry Point - Butane	07-01-2019 08:54 AM

## OPERATOR'S PUBLIC WEB PAGE

**Question #33**  
For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

**33. Results**  
Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.C Pipe Location Information ; Q33.D How to get additional information ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.J ROW Encroachment ; Q33.K Pipeline Location Information ; Q33.M Emergency Preparedness

**33. Notes**  
Number of results seem adequate.

## ADVISORY BULLETIN REVIEW

**Question #34**  
Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

**34. Results**  
NO

**ADB 2019-01**  
ADB 2019-01 Flood Mitigation

**34. Notes**  
No waterways with scour potential

**Question #35**  
If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

**35. Results**  
Not Applicable

**ADB 2019-01**  
ADB 2019-01: Flood Mitigation

**35. Notes**  
No waterways with scour potential

**Question #36**  
Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

**36. Results**  
YES

**ADB 2019-02**  
ADB 2019-02: Earth Movement/Geological Hazards

**36. Notes**  
Determined to be in an area with an earthquake intensity scale of [4] - light shaking, lower threat to pipeline integrity.  
Seismicity: [4] - Monitor for earthquakes in proximity in accordance to earthquake response process

**Question #37**  
If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

**37. Results**  
Satisfactory

**ADB 2019-02**  
ADB 2019-02: Earth Movement/Geological Hazards

**37. Notes**  
Seismicity: [4] - Monitor for earthquakes in proximity in accordance to earthquake response process

**Question #38**

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01  
ADB 2020-01 Inside Meter Sets

**38. Results**  
NO

**38. Notes**  
Transmission Operator

**Question #39**

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01  
ADB 2020-01 Inside Meter Sets

**39. Results**  
Not Applicable

**39. Notes**  
Transmission Operator

**Question #40**

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-01  
ADB 2020-01 Inside Meter Sets

**40. Results**  
Not Applicable

**40. Notes**  
Transmission Operator

**Question #41**

Does the operator have any low pressure systems?

ADB 2020-02  
ADB 2020-02 Low Pressure Systems

**41. Results**  
Not Applicable

**41. Notes**  
Transmission Operator

**Question #42**

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02  
ADB 2020-02 Low Pressure Systems

**42. Results**  
Not Applicable

**42. Notes**  
Transmission Operator

**Question #43**

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02  
ADB 2020-02 Low Pressure Systems

**43. Results**  
Not Applicable

**43. Notes**  
Transmission Operator

**Question #44**

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02  
ADB 2020-02 Low Pressure Systems

**44. Results**  
Not Applicable

**44. Notes**  
Transmission Operator

**SUMMARY OF REQUIRED COMMENTS**

**COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.**

Q4- Not Applicable - There were no reportable incidents or trends identified.

Q5- Not Applicable - There were no accidents or damages identified.

Q6- Not Applicable - There were no incidents or trends identified.

Q7- Not Applicable - There were no SRC's identified.

Q8- Not Applicable - There were no SRC's identified.

Q10- Not Applicable - No changes since last inspection. The last revision was on 5/6/2020.

Q12- Not Applicable - No changes since last inspection. The last revision was on 5/6/2020.

Q15- Not Applicable - The TIMP is located in OMER procedure #P-192.901, last revised on 5/6/2020. with no changes since last inspection Dec 6, 2020. LIMP inspection of BP Cherry Point, and Olympic laterals Feb 16-19, 2021 with no findings.

Q19- Not Applicable - Transmission Operator

Q20- Not Applicable - Transmission Operator

Q21- Not Applicable - Transmission Operator

Q23- Not Applicable - Transmission Operator

Q34- No - No waterways with scour potential

Q35- Not Applicable - No waterways with scour potential

Q38- Not Applicable - Transmission Operator

Q39- Not Applicable - Transmission Operator

Q40- Not Applicable - Transmission Operator

Q41- Not Applicable - Transmission Operator

Q42- Not Applicable - Transmission Operator

Q43- Not Applicable - Transmission Operator

Q44- Not Applicable - Transmission Operator