

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	Ferndale Pipeline Section 114 #8517	Operator(s)	FERNDALE PIPELINE SYSTEM (570)	Plan Submitted	09/19/2022
		Lead	Darren Tinnerstet	Plan Approval	09/20/2022 by Scott Rukke
		Supervisor	Scott Rukke	All Activity Start	11/02/2022
		Director	Sean Mayo	All Activity End	11/02/2022
Status	PLANNED			Inspection Submitted	--
Start Year	2022			Inspection Approval	--
System Type	GT				
Protocol Set ID	GT.2022.02				

Inspection Summary

Inspection Scope and Summary

The inspection was conducted in person at the Renton headquarters. There were no findings from the review.

Facilities visited and Total AFOD

11/2/2022 records review at Renton headquarters = 1 AFOD

Summary of Significant Findings(DO NOT Discuss Enforcement options)

There were no 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

John D'Andrea, Head of North American Operations and HSSE

BP Pipelines of North America

M.C. 9S 30S Wacker Drive,

Chicago, Illinois 60606

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required
									%	Complete
1.	88968 (91)	Ferndale Pipeline System	unit	88968	--	24	24	24	24	100.0%

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

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88968 (91)	--	114	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	Focus Directives	Involved Groups/Subgroups	Qst Asset Type(s)	Planned	Required	Inspected	Total	Required
											%
											Complete
1	Ferndale Pipeline Section 114	--	11/02/2022	--	all planned questions	all assets types	24	24	24	24	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	Ferndale Pipeline Section 114	COMPLETED	11/02/2022	Ferndale Pipeline Section 114	--

Results (all values, 24 results)

58 (instead of 24) results are listed due to re-presentation of questions in more than one sub-group.

114.GT: Section 114 - Gas Transmission

1. Question Result, ID, References **NIC, SRN.114.INSPECTCVRG.S**, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *What are your assets comprised of?*

Assets Covered **88968 (91)**

Result Notes **System is comprised of 36.2 miles of natural gas transmission pipeline**

31.7 miles of 16-inch from Sumas to Cherry Point refinery.

4.5 miles of 8-inch from Cherry Point to Intalco Plant.

5 block valves.

Odorizer is located at Sumas station.

2. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*

Assets Covered 88968 (91)
Result Notes System only transports end use natural gas.

3. Question Result, ID, References NA, SRN.114.DRIVERENGINE.S, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*

Assets Covered 88968 (91)

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

4. Question Result, ID, References NIC, SRN.114.NGUSE.S, (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*

Assets Covered 88968 (91)

Result Notes Each block valve site (16 inch line) have thermal generators run by natural gas. .

Sumas station - emergency generator is run by natural gas but very rarely used.

5. Question Result, ID, References NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*

Assets Covered 88968 (91)

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

6. Question Result, ID, References NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*

Assets Covered 88968 (91)

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

7. Question Result, ID, References Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)

Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*

Assets Covered 88968 (91)

Result Notes Gas OMER (Operations Maintenance and Emergency Response). April 2022 revised version.

Section 1 - Minimize Hazardous Natural Gas Releases from Pipeline Facilities.

8. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*

Assets Covered 88968 (91)

Result Notes Gas OMER (Operations Maintenance and Emergency Response) Book1. April 2022 revised version.

Section 1 - Vented Natural Gas Emission.

9. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*

Assets Covered 88968 (91)

Result Notes Gas OMER Manual - Investigation of Incidents / Failures - Procedure #P-192.617

Section 3 - Pipeline Incident / Failure Investigation

10. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 88968 (91)

Result Notes Gas OMER Book 1

Section 3 - Pipeline Segment Threat Identification and Information Analysis

BP USPL GP-43-0049-1 Pipeline Integrity Management (PIM) Appendix 1

11. Question Result, ID, References Sat, 114.114.LKRLSDETECTLK.P, 49 U.S.C. 60108(a)

Question Text *Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?*

Assets Covered 88968 (91)

Result Notes Gas OMER Book 1

Section 1 - Ferndale Pipeline System (250A and 250B) - Fugitive Natural Gas Emission

Instrumented and non-instrumented leak detection.

12. Question Result, ID, References Sat, 114.114.LKMITGRPRREPAIR.P, 49 U.S.C. 60108(a)

Question Text *Do procedures provide alternatives to cutouts (to reduce emissions)?*

Assets Covered 88968 (91)

Result Notes USPL GIS 32-0012 - Specifications for installing clock spring repair sleeves.

Gas OMER Manual - Repairs Replacements and Relocations #P-192.71

Section V - Reasons for Schedule of Repair

13. Question Result, ID, References Sat, 114.114.TESTESD.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)

Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*

Assets Covered 88968 (91)

Result Notes Bypass on the 16 inch. Only ESD devices are block valves which are tested annually with the bypass.

Gas OMER Book 2

Section 5.69.03 - Ferndale Pipeline Mainline Block Valves.

14. Question Result, ID, References Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*

Assets Covered 88968 (91)

Result Notes Two relief valves are tested once per year with nitrogen. This minimizes the release of gas.

Procedure USPL-MAN-730-030: Pilot Operated Valves , Inspection and Maintenance Procedure Nitrogen.

15. Question Result, ID, References NA, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)

Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*

Assets Covered 88968 (91)

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

Flaring is only done when mercaptan is refilled approximately once every 10 years.

16. Question Result, ID, References Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)

Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*

Assets Covered 88968 (91)

Result Notes Gas OMER Book 1

Section 1 - Ferndale Pipeline System (250A and 250B) - Fugitive Natural Gas Emission

Procedure specifically addresses that if any natural gas assets are added to the system that emission reduction will be a priority.

17. Question Result, ID, References NA, 114.114.GNLCMPSTATION.P, 49 U.S.C. 60108(a) (also presented in: 114.GGBOOST)
Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*
Assets Covered 88968 (91)
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.
18. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*
Assets Covered 88968 (91)
Result Notes Gas OMER Book 1 - Section 1 (2) - definition of determining leak prone segments. Currently do not have any leak prone pipe.
19. Question Result, ID, References Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
Assets Covered 88968 (91)
Result Notes Gas OMER Book 1 - Section 1 (3) - Monitoring for leak prone pipeline segments. Currently do not have any leak prone pipe.
20. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPEXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*
Assets Covered 88968 (91)
Result Notes All pipe was purchased from US Steel Corp. in triple random lengths, mill coated, with extruded polyethylene.
21. Question Result, ID, References Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.UNGS, 114.GGBOOST)
Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*
Assets Covered 88968 (91)
Result Notes Gas OMER Book 1

Section 1(V) - Replacement or remediation of leak prone pipe segments.

114.UNGS: Section 114 - Underground Natural Gas Storage

22. Question Result, ID, References NIC, SRN.114.INSPECTCVRG.S, (also presented in: 114.GT, 114.GGBOOST)
Question Text *What are your assets comprised of?*
Assets Covered 88968 (91)
Result Notes System is comprised of 36.2 miles of natural gas transmission pipeline

31.7 miles of 16-inch from Sumas to Cherry Point refinery.

4.5 miles of 8-inch from Cherry Point to Intalco Plant.

5 block valves.

Odorizer is located at Sumas station.

23. Question Result, ID, References **NIC, SRN.114.GASTRANSPORT.S**, (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*
Assets Covered **88968 (91)**
Result Notes **System only transports end use natural gas.**
24. Question Result, ID, References **NA, SRN.114.DRIVERENGINE.S**, (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
25. Question Result, ID, References **NIC, SRN.114.NGUSE.S**, (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*
Assets Covered **88968 (91)**
Result Notes **Each block valve site (16 inch line) have thermal generators run by natural gas. .**

Sumas station - emergency generator is run by natural gas but very rarely used.
26. Question Result, ID, References **NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
27. Question Result, ID, References **NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
28. Question Result, ID, References **Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER (Operations Maintenance and Emergency Response) Book1. April 2022 revised version.**

Section 1 - Vented Natural Gas Emission.
29. Question Result, ID, References **Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Manual - Investigation of Incidents / Failures - Procedure #P-192.617**

Section 3 - Pipeline Incident / Failure Investigation
30. Question Result, ID, References **Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Book 1**

Section 3 - Pipeline Segment Threat Identification and Information Analysis

BP USPL GP-43-0049-1 Pipeline Integrity Management (PIM) Appendix 1

31. Question Result, ID, References **NA, 114.114.LKRLSWELLHD.P, 49 U.S.C. 60108(a)**
Question Text *Do procedures provide for periodic leakage surveys around the wellhead?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
32. Question Result, ID, References **NA, 114.114.LKRLSANN.P, 49 U.S.C. 60108(a)**
Question Text *Do procedures provide for periodic checking of wellhead annuluses for indications of leaks (e.g., unexplained pressure variations)?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
33. Question Result, ID, References **NA, 114.114.LKRLSFIELD.P, 49 U.S.C. 60108(a)**
Question Text *Do procedures provide for leak surveys for well casing containment or geologic issues?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
34. Question Result, ID, References **Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*
Assets Covered **88968 (91)**
Result Notes **Two relief valves are tested once per year with nitrogen. This minimizes the release of gas.**

Procedure USPL-MAN-730-030: Pilot Operated Valves , Inspection and Maintenance Procedure Nitrogen.
35. Question Result, ID, References **Sat, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Book 1**

Section 1 - Ferndale Pipeline System (250A and 250B) - Fugitive Natural Gas Emission

Procedure specifically addresses that if any natural gas assets are added to the system that emission reduction will be a priority.
36. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Book 1 - Section 1 (2) - definition of determining leak prone segments. Currently do not have any leak prone pipe.**
37. Question Result, ID, References **Sat, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.GGBOOST)
Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Book 1 - Section 1 (3) - Monitoring for leak prone pipeline segments. Currently do not have any leak prone pipe.**

38. Question Result, ID, **Sat, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, References 114.GGBOOST)
 Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*
 Assets Covered **88968 (91)**
 Result Notes **All pipe was purchased from US Steel Corp. in triple random lengths, mill coated, with extruded polyethylene.**
39. Question Result, ID, **Sat, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, References 114.GGBOOST)
 Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*
 Assets Covered **88968 (91)**
 Result Notes **Gas OMER Book 1**
- Section 1(V) - Replacement or remediation of leak prone pipe segments.**

114.GGBOOST: Section 114 - Gas Gathering & Boosting

40. Question Result, ID, **NIC, SRN.114.INSPECTCVRG.S,** (also presented in: 114.GT, 114.UNGS) References
 Question Text *What are your assets comprised of?*
 Assets Covered **88968 (91)**
 Result Notes **System is comprised of 36.2 miles of natural gas transmission pipeline**
- 31.7 miles of 16-inch from Sumas to Cherry Point refinery.**
- 4.5 miles of 8-inch from Cherry Point to Intalco Plant.**
- 5 block valves.**
- Odorizer is located at Sumas station.**
41. Question Result, ID, **NIC, SRN.114.GASTRANSPORT.S,** (also presented in: 114.GT, 114.UNGS) References
 Question Text *Do you transport natural gas as a specific commodity (i.e., not a byproduct or constituent of another substance)?*
 Assets Covered **88968 (91)**
 Result Notes **System only transports end use natural gas.**
42. Question Result, ID, **NA, SRN.114.DRIVERENGINE.S,** (also presented in: 114.GT, 114.UNGS) References
 Question Text *Do you use natural gas-fueled drivers or engines to compress natural gas?*
 Assets Covered **88968 (91)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
43. Question Result, ID, **NIC, SRN.114.NGUSE.S,** (also presented in: 114.GT, 114.UNGS) References
 Question Text *Do you use natural gas for fuel or power appurtenances or instrument gas on regulated facilities?*
 Assets Covered **88968 (91)**
 Result Notes **Each block valve site (16 inch line) have thermal generators run by natural gas. .**
- Sumas station - emergency generator is run by natural gas but very rarely used.**
44. Question Result, ID, **NA, 114.114.COMPRESSOR.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS) References
 Question Text *Do the maintenance and operations procedures for compressors include provisions to minimize fugitive natural gas losses?*
 Assets Covered **88968 (91)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
45. Question Result, ID, **NA, 114.114.DRIVERENGINE.P, 49 U.S.C. 60108(a)** (also presented in: 114.GT, 114.UNGS) References

Question Text *Do maintenance procedures include measures for monitoring and correcting incomplete combustion of natural gas in driver or engine exhausts and taking corrective action if identified?*

Assets Covered 88968 (91)

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

46. Question Result, ID, References Sat, 114.114.LKRLSID.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)

Question Text *Do procedures provide a methodology for identifying sources of fugitive natural gas emissions in the system?*

Assets Covered 88968 (91)

Result Notes Gas OMER (Operations Maintenance and Emergency Response). April 2022 revised version.

Section 1 - Minimize Hazardous Natural Gas Releases from Pipeline Facilities.

47. Question Result, ID, References Sat, 114.114.LKRLSVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

Question Text *Do procedures identify measures for minimizing natural gas release volumes associated with non-emergency venting and blowdowns from operations and maintenance?*

Assets Covered 88968 (91)

Result Notes Gas OMER (Operations Maintenance and Emergency Response) Book1. April 2022 revised version.

Section 1 - Vented Natural Gas Emission.

48. Question Result, ID, References Sat, 114.114.LKRLSUNEXPCTVENT.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

Question Text *Do procedures provide for investigation of any unanticipated vented releases of natural gas, and if so, what are the associated actions?*

Assets Covered 88968 (91)

Result Notes Gas OMER Manual - Investigation of Incidents / Failures - Procedure #P-192.617

Section 3 - Pipeline Incident / Failure Investigation

49. Question Result, ID, References Sat, 114.114.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*

Assets Covered 88968 (91)

Result Notes Gas OMER Book 1

Section 3 - Pipeline Segment Threat Identification and Information Analysis

BP USPL GP-43-0049-1 Pipeline Integrity Management (PIM) Appendix 1

50. Question Result, ID, References Sat, 114.114.TESTESD.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)

Question Text *Do procedures contain measures for ensuring ESD testing minimizes natural gas releases?*

Assets Covered 88968 (91)

Result Notes Bypass on the 16 inch. Only ESD devices are block valves which are tested annually with the bypass.

Gas OMER Book 2

Section 5.69.03 - Ferndale Pipeline Mainline Block Valves.

51. Question Result, ID, References Sat, 114.114.TESTRELIEFVLV.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)

Question Text *Do relief valve testing procedures include measures to minimize natural gas releases?*

Assets Covered 88968 (91)

Result Notes Two relief valves are tested once per year with nitrogen. This minimizes the release of gas.

52. Question Result, ID, References **NA**, 114.114.FLARE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)
Question Text *Do procedures for flaring from pipeline facilities for transporting natural gas include measures for minimization of natural gas emissions?*
Assets Covered **88968 (91)**
Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

Flaring is only done when mercaptan is refilled approximately once every 10 years.
53. Question Result, ID, References **Sat**, 114.114.GNLDSGNCNFG.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
Question Text *Do operation and maintenance procedures contain mechanisms for identifying potential design/configuration changes for reducing natural gas releases?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Book 1**

Section 1 - Ferndale Pipeline System (250A and 250B) - Fugitive Natural Gas Emission

Procedure specifically addresses that if any natural gas assets are added to the system that emission reduction will be a priority.
54. Question Result, ID, References **NA**, 114.114.GNLCMPSTATION.P, 49 U.S.C. 60108(a) (also presented in: 114.GT)
Question Text *Do procedures contain mechanisms for minimizing natural gas emissions from operations and maintenance activities within a compressor station (i.e., beyond compressor/driver-specific procedures)?*
Assets Covered **88968 (91)**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
55. Question Result, ID, References **Sat**, 114.LEAKPRONE.LKRLS.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
Question Text *What procedures are in place to monitor for and identify pipe segments that are leak-prone, and what criteria (e.g., frequency of leak or failure events) are specified for determining a pipeline segment is leak-prone?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Book 1 - Section 1 (2) - definition of determining leak prone segments. Currently do not have any leak prone pipe.**
56. Question Result, ID, References **Sat**, 114.LEAKPRONE.LKRLSLKDATA.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
Question Text *Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Book 1 - Section 1 (3) - Monitoring for leak prone pipeline segments. Currently do not have any leak prone pipe.**
57. Question Result, ID, References **Sat**, 114.LEAKPRONE.LKMITGRPREXAMPLE.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
Question Text *Do procedures identify cast iron, unprotected steel, wrought iron, and vintage plastic pipe with known leak issues?*
Assets Covered **88968 (91)**
Result Notes **All pipe was purchased from US Steel Corp. in triple random lengths, mill coated, with extruded polyethylene.**
58. Question Result, ID, References **Sat**, 114.LEAKPRONE.LKMITGRPROTHER.P, 49 U.S.C. 60108(a) (also presented in: 114.GT, 114.UNGS)
Question Text *Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?*
Assets Covered **88968 (91)**
Result Notes **Gas OMER Book 1**

Section 1(V) - Replacement or remediation of leak prone pipe segments.

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