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ONE HUNDRED NINTH CONGRESS

U.S. House of Representatives  
Committee on Energy and Commerce  
Washington, DC 20515-6115

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April 25, 2006

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The Honorable Norman Y. Mineta  
Secretary  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

*Norm:*  
Dear Secretary Mineta:

On March 2, 2006, BP officials discovered a leak in one of the North Slope's main transmission lines, several miles upstream from the Pump Station 1 of the Trans Alaska Pipeline System (TAPS). The leak resulted in the loss of between 200,000 and 300,000 gallons of crude, and is now the largest spill ever on the North Slope. On March 15, after an initial investigation, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Corrective Action Order requiring BP Exploration (Alaska) Inc. (BP), to take several actions regarding the breached pipeline, as well as numerous other lines in the greater Prudhoe Bay operating area. More specifically, additional actions are now ordered for pipelines servicing the Prudhoe Bay West Operating Area (PBWOA), Prudhoe Bay East Operating Area (PBEOA), and the Lisburne hazardous liquid pipeline facilities, all of which are operated by BP.

Earlier this month, Committee staff visited the North Slope of Alaska and several points on the Trans Alaska Pipeline System to discuss pipeline integrity and corrosion issues and specifically investigate the possible causes of this spill. This effort followed two letters recently sent to both BP and the operator of the TAPS -- Alyeska Pipeline Service Company (Alyeska) -- to gather additional information on the spill event as well as other integrity issues.

To date, the initial efforts of BP to address potential root causes of the spill and ongoing environmental restoration efforts are commendable. Similarly, the early efforts by the company to determine where additional and similar corrosion may be occurring and placing additional North Slope pipelines in jeopardy are much appreciated. Nevertheless, there remain several questions about the causes of this spill as well as the capabilities of BP to maintain the integrity of some of the pipelines in the Prudhoe Bay operating area. Moreover, there are numerous other issues about how the key pipelines in Prudhoe Bay have been managed to date and whether additional steps may be warranted to prevent future breaches. I request your help in addressing

some of these concerns and would appreciate your Department's response to the following questions by Tuesday, May 16, 2006:

1. The March 15 Corrective Action Order issued by PHMSA, requires that BP perform a number of maintenance procedures -- including the application of scraper pigs and smart pigs -- on several key lines serving the PBEOA and the Lisburne line. This region encompasses a number of key facilities including Flow Stations 1, 2, and 3 that eventually connect through a series of lines to Skid 50. Skid 50 is the last facility operated by BP before the transmission lines connect to PS 1 of TAPS. Item (7) of the attached Department of Transportation's (DOT) Corrective Action Order requires that BP:

"Perform an internal inspection using calibrated smart pig on the PBEOA and Lisburne pipelines within 3 months of receipt of this Order. Take appropriate action to address all anomalies discovered, in accordance with the standard for anomaly repair in 40 C.F.R Part 195. Record differences between inline inspection data and actual "as found" data for all anomalies and integrate that data in future analyses, mapping corrosion growth, and confirming data gathered by inline inspection tool. Develop and submit for approval a plan to perform internal inspection at regular intervals, not to exceed 5 years, and schedule for the repair of anomalies identified through those inspections. Implement that plan for approval."

It is our understanding, however, that before implementing any internal inspection "using calibrated smart pig" -- as the order requires -- these lines must be first cleaned using a scraper pig to remove any buildup of sludge or other deposits that may have collected. In discussions with both Alyeska and BP officials, staff was informed that several key lines -- which appear to fall under the Corrective Order -- may not have been cleaned with a scraper pig since 1992. Additionally, other officials told staff that deposits of sludge may contribute to corrosion, particularly if the sludge traps a layer of water or the sludge prevents corrosion inhibitors from reaching and protecting the pipeline wall.

- (a) Does DOT share the view that sludge may be a contributing factor to corrosion (and thus pipeline integrity) and if so, how specifically?
  - (b) What impact would the buildup of sludge or other material have on the effectiveness of corrosion-detection coupons?
2. Alyeska officials informed staff that the entire 800-mile TAPS is regularly cleaned with scraper pig once every 14 days.

- (a) Is this DOT's understanding? And if so, what benefit does such scraping have on the integrity of this line or pipelines in general?
  - (b) What is DOT's understanding of the frequency of smart pigging on TAPS?
- 3. Staff was informed that several of the key lines serving the PBEOA (specifically the main transmission lines from Flow Stations 1, 2, and 3 that ultimately connect to Skid 50) and the Lisburne line have not been cleaned with a scraper pig, nor have they been examined with a smart pig, since as long ago as 1992. Moreover, staff was informed that these lines may now collectively contain considerable sludge and other buildup. In fact, company officials interviewed by staff said that there is potential for approximately 1,000 to 2,500 cubic yards of sludge to be removed from the pipelines that flow from Skid 50 to Flow Stations 1, 2, and 3.
  - (a) What is DOT's understanding of the frequency in which the key lines that service the PBEOA, from Flow Stations 1, 2, and 3 to Skid 50 have been scraped with maintenance pigs. What is DOT's understanding of the frequency of smart pigging of these lines? Please also address the frequency of smart pigging and cleaning pigging for the Lisburne line.
  - (b) At present, what is DOT's general understanding of the condition of all lines referenced in question 3(a)? Also, is it correct that at this point many of the lines in the PBEOA are deemed "indeterminate" by DOT?
  - (c) Does DOT have an estimation of the amount of sludge buildup that may exist in these lines by volume measure? What is the process for removing large amounts of sludge and buildup should it exist?
  - (d) Why does the entire 800-mile TAPS get scraper-pigged once every 14 days, yet many of the key lines that comprise the PBEOA have not been scraper pigged for perhaps as long as 14 years? Are there reasonable explanations for not scraper pigging these lines and does this length of time represent sound maintenance practices?
- 4. Staff was told by one official that previous attempts were made to operate scraper pigs on the major lines of the PBEOA (from Flow Stations 1, 2, and 3 to Skid 50) and the Lisburne line, yet some of these efforts were abandoned due to the volume of sludge being produced.

- (a) Has DOT determined if earlier attempts were made to clean any or all these key lines and were significant amounts of sludge found?
  - (b) Has DOT asked for all documentation to show the maintenance history of those lines and any discussion regarding potential earlier difficulties in cleaning them due to high sludge or buildup volume?
  - (c) Does DOT even know the key results of these earlier pigging efforts?
- 5. Both Alyeska and BP officials told staff that if the sludge in these lines is considerable, the possibility exists that any maintenance pig sent through these lines might become stuck, which in a worst case scenario could result in the shutdowns of one or more flow stations.
  - (a) What is DOT's estimate of a pig "sticking" possibility?
  - (b) On what specific lines and in what location is this possibility greatest?
  - (c) Does DOT believe that cleaning these lines could result in a blockage that could result in the shutdown of one or more flow stations?
  - (d) Should the worst case scenario occur and flow stations are shut down, what are the implications for a "cold restart," given the time period DOT estimates such cleaning efforts will need to take place (e.g., potentially cold-weather months)?
- 6. If considerable amounts of sludge are discovered in these lines, how will that sludge be captured and disposed of? Some officials told staff that both the metering and strainers at TAPS's PS 1 may have to be bypassed due to anticipated volume. Staff was also told that one scenario would be to collect such sludge in the breakout tanks at PS 1. Another scenario would be to have BP collect the material at Skid 50 before the material makes its way to PS 1, yet currently there are no tanks available that could hold the possible volumes of this material. What is DOT's understanding of how this material will be handled, particularly if it is so voluminous? If the material is collected in the PS 1 breakout tanks, does that raise any safety or integrity issues for Alyeska and TAPS?
- 7. It is my understanding that BP Exploration (Alaska), Inc., had scheduled to smart pig the line that failed (and perhaps other key lines in the PBEOA) in 2006.

Nonetheless, there are now considerable engineering issues being “worked” to deal with the sludge problem and the potential for complications associated with running cleaning and maintenance pigs through at least some of these lines. Much of this engineering effort appears to be in its early stages. Moreover, until only recently senior officials from Alyeska appeared to know very little about the potential for downstream complications resulting from potential sludge. Given that the warmer (i.e., summer) months are approaching and this period of time is viewed as the most opportune time to run maintenance pigs through these lines, one would expect that key engineering questions about this effort would already be addressed.

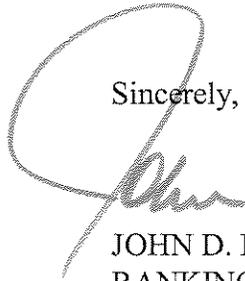
- (a) What evidence does DOT have regarding any scheduled pigging efforts planned for any of the lines covered by the Corrective Order that were in place prior to the rupture discovered on March 2, 2006?
  - (b) Has DOT asked BP for such evidence?
- 8. Recently, it was reported in the press that another line -- this time a small 3-inch gas pipe – also failed due to corrosion. According to press accounts, the volume of gas release in this line was too small to report to regulators. Nonetheless, we believe understanding the causes of this rupture may have some relevance to the current undertaking being pursued by DOT’s Corrective Order.
  - (a) When, if at all, was DOT informed about this second rupture?
  - (b) Was this a potentially dangerous event to either the environment or workers? If so, how?
  - (c) Has DOT determined the causes of this failure? If so, please provide them.

At a time when crude oil prices are again reaching record-high levels and the supply is oil is tight, the soundness of the pipelines that serve the greater Prudhoe Bay operating area is critical to the Nation’s national security. I appreciate DOT’s efforts to work with BP, Inc., to make this operation as safe as possible and I thank you for your leadership on this important matter.

Should you have any additional questions regarding this request, please contact me, or have your staff contact Mr. Christopher Knauer of the Committee on Energy and Commerce Democratic staff at (202) 226-3400.

The Honorable Norman Y. Mineta  
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Sincerely,

A handwritten signature in dark ink, appearing to read 'John D. Dingell', written over a large, light-colored circular scribble.

JOHN D. DINGELL  
RANKING MEMBER

cc: The Honorable Joe Barton, Chairman  
Committee on Energy and Commerce

The Honorable Kathleen Clarke, Director  
Bureau of Land Management  
U.S. Department of Interior

Mr. Jerry Brossia, Authorized Officer  
The Joint Pipeline Office  
Federal Bureau of Land Management - Alaska State Office

Mr. Kevin Hostler, President and Chief Executive Officer  
Alyeska Pipeline Service Company