

June 21, 2002

Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

RE: Hazardous Liquids Pipeline Safety Rulemaking, Chapter 480-75 WAC Docket TO-000712

Dear Secretary Washburn,

BP, as the operator of the Olympic Pipe Line system, supports the Washington Utilities and Transportation Commission (WUTC) in its role as a participant in the oversight of the pipelines industry. We support WUTC's intent to provide further assurances to the public of its ability to understand, influence, and assess the safety and environmental performance of pipeline operators. We are committed to continually improving our performance and to aid others in the industry to improve the safety and environmental performance of their pipeline operations.

Olympic Pipe Line supports WUTC's use of 49 CFR 195 for pipeline design, construction, and operations. This is a process that took many years of input and has incorporated the 'best practices' from around the country.

With regard to the WUTC request for information concerning the economic impact of proposed pipeline safety rules, Docket TO-000712, BP provides the attached estimates. Part III of the form was not addressed in our response due to the fact that many of the variables for sound economic estimates were not identified. For example, new construction within Washington State could be subject to the Energy Facilities Siting and Evaluation Council (EFSEC) process, which has separate requirements for studies, etc.

We hope that you will give the attached information due consideration in your rulemaking process. We look forward to working with staff to further explain our concerns about the rule, as proposed in its current form.

We would also request that all rulemaking notifications and information requests (for both liquid and gas pipelines) be addressed and mailed to me per the enclosed business card as well as any other personnel who have previously requested to be a part of the docket.

Sincerely,

James A. Clark
Health Safety and Environment Manager
Olympic Pipe Line Company
BP Pipelines (North America), Inc.