



June 26, 2002

Ms. Carole Washburn, Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr., S. W.  
P.O. Box 47250  
Olympia, Washington 98504-7250

Re: Liquids Pipeline Safety Rulemaking Chapter 480-75 WAC  
Docket No. TO-000712

Dear Ms. Washburn:

BP submits these comments in response to the Notice of Opportunity to File Written Comments on Liquids Pipeline Safety Rulemaking (Docket No. TO-000712). BP is involved in many aspects of the energy industry, including oil and gas exploration, production, transportation, refining, and marketing of petroleum products. We operate thousands of miles of liquid petroleum trunk pipelines in the United States. As such, our experience as a pipeline operator allows us to draw on a vast and highly qualified pool of resources when considering safety and regulatory issues, and make that experience available to the regulating community and the public. We therefore encourage the WUTC to consider these comments when making decisions on the very important issue of pipeline safety. Our goals are the same in this area, protect the public and the environment.

As the new operator of Olympic Pipe Line Company, we now operate 400 miles of pipeline transporting petroleum products in the States of Washington and Oregon. Our comments specifically address improved safety and environmental protection for liquid pipelines in the State of Washington.

BP supports the Washington Utilities and Transportation Commission (WUTC) in its effort to improve pipeline safety in the State of Washington. 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.

BP supports WUTC's use of 49 CFR 195 for pipeline design, construction, and operations. These regulations prescribe the standards for new pipeline systems and operation and maintenance of existing pipeline systems. Many specifications and standards in 49 CFR 195 are based on sound engineering practices from NFPA, AGA, API, ANSI, ASME, ASTM, and others. In the current proposal, Docket TO-000712, several issues around the incorporation of standards normally reserved for gas service pipelines are of extreme concern. In the case of existing pipelines, incorporation of 49 CFR 192 type requirements in the areas of design, construction and repair, operations and maintenance and reporting cause problematic issues ranging from duplication and confusion in implementing policies and procedures to operational issues affecting safety and pipeline throughput. We would strongly urge further discussion of the proposed regulations as well as the regulatory process prior to any further action for implementation is taken.

Commissioner, Washington Utilities and Transportation Commission

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BP is actively participating in the development and improvement of industry standards. We intend to continue to work with interested parties to develop the industry standards, and provide comments to the Office of Pipeline Safety (OPS) to assure the effectiveness of new rules on public safety and environmental protection.

Safe pipeline operations and compliance with safe operating practices and standards are discussed in our organization on an ongoing basis. Design, construction, operating and maintenance decisions are made with the goal of safe and efficient operation. Misapplied requirements can result in a false sense of security, because the most effective design and construction for one section of pipeline, may be less effective in another section of pipeline. To ensure safe, reliable performance of our assets, it is our responsibility to integrate all of these variables into our decision-making related to the design and construction of our facilities, and then to monitor performance and improve our processes. For this reason, standards such as 49 CFR Part 195 and associated standards were developed, and provide a consistent framework which allows flexibility to address various pipeline operation, environment and technology factors.

BP's comments concerning the draft language are summarized below. BP looks forward to discussing this and future proposed guidance with commission staff.

Sincerely,

David O. Barnes  
Engineering Manager  
Olympic Pipe Line Company  
BP Pipelines (North America), Inc.