



January 9, 2007

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

Re: Hazardous Liquids Pipeline Safety Rulemaking Chapter 480-75 WAC
Docket No. PL-061026
Commenting Party – **BP Pipelines N.A.**

Secretary:

BP submits these comments in response to the Notice of Opportunity to File Written Comments on Hazardous Liquids Pipeline Safety Rulemaking (Docket No. PL-061026). We operate over 8,000 miles of liquid petroleum trunk pipelines in the United States. As the operator of Olympic Pipe Line Company, we 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 hazardous liquid pipelines in the State of Washington.

BP supports the Washington Utilities and Transportation Commission (WUTC) in its role as a participant in the oversight of the pipeline 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.

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 PHMSA to assure the effectiveness of new rules on public safety and environmental protection.

BP's comments concerning the draft language of **WAC 480-75-450** are summarized below.

WAC 480-75-450 Construction specifications. Operators must assure that new pipeline construction (~~must~~) conforms to the requirements of ASME B31.4. Information about the ASME edition adopted and where to obtain it are set out in WAC 480-75-999, Adoption by reference. The longitudinal seams of connecting pipe joints must be offset by at least two inches. In addition, the longitudinal seams must be located on the upper half of the pipe when laid in the trench.

BP submits the following comments:

1. Language should be added that exempts the requirements that the seams be located on the upper half of the pipe when constructing pipelines using boring or directional drilling techniques. It would be nearly impossible to control the orientation of the pipe seams while using these construction techniques.

BP's comments concerning the draft language of **WAC 480-75-650** are summarized below.

WAC 480-75-650 Annual reports. Operators must file the following annual reports with the commission no later than April 1 for the preceding calendar year:

(1) A copy of Pipeline and Hazardous Safety Administration (PHMSA) F-7000.1-1 annual report required by the PHMSA, Office of Pipeline Safety.

(2) A report titled, "Hazardous Liquid Annual Report Form." The annual report must include in detail the following information:

(a) Interstate and intrastate pipeline mileage in Washington state; and

(b) List of reportable and nonreportable safety-related conditions as defined in 49 CFR 195.55.

BP submits the following comments:

1. Item (1) above requires a copy of the PHMSA Annual Report (F-7000.1-1) be submitted. The PHMSA Annual Report (F-7000.1-1) could include information from multiple systems in multiple states and may not reflect specifically information on the pipelines located in the State of Washington.

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We are committed to working with WUTC to ensure safe pipeline operations, through this rulemaking and other cooperative initiatives. As written language often requires clarification, BP would welcome the opportunity to discuss these and other comments to proposed rules at the WUTC's convenience.

Best regards,

David Knoelke
Compliance Coordinator
BP Pipelines North America