



October 17, 2002

Ms. Sondra Walsh, Senior Policy Strategist
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 480-75-390 WAC
Docket No. TO-000712

Dear Ms. Walsh:

BP submits these comments in response to the Notice of Opportunity to File Written Comments on Hazardous Liquids Pipeline Safety Rulemaking (Docket No. TO-000712). We operate over 10,000 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 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.

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.

The questions raised by WUTC in this Notice and Proposed Rules are discussed within our organization on an ongoing basis in the context of design, construction, operating and maintenance decisions. As you can imagine, the answers vary depending on many factors, including the specific operation (e.g., product characteristics, receiving and delivery

requirements), the environment (e.g., terrain, hydrogeology), and technology. 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. Detailed, prescriptive 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. For this reason 49 CFR Part 195 and associated standards provide a consistent framework that allows flexibility to address various pipeline operation, environment and technology factors.

BP's comments concerning the draft language are summarized below. At the Commissions' request, BP has also provided revised copies of the proposed language in the documents attached to this communication.

WAC 480-75-390 Valve Spacing Rapid Shutdown - BP submits 2 comments;

1. In line 1 of the proposed rule language, we suggest the word "procedure" be changed to "the ability to". Changing the language in this manner will take into account factors such as training, technology, procedures and other methods of surveillance and processes of monitoring the pipeline to identify, respond to, and minimize spills.
2. In line 3 (second sentence) BP would recommend that the word "age" be replaced with "condition". Such a change in the language would prompt operators to consider a broad range of factors including: pipe type, cathodic protection, internal inspection data, and age when determining the location of new rapid shutdown valves.

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