

Secretary, Washington Utilities and Transportation Commission
February 8, 2002
Page 1 of 2

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

Re: Hazardous Gas Pipeline Safety Rulemaking
Docket No. UG-011073

Dear Secretary Washburn:

BP submits these comments in response to the Notice of Opportunity to File Written Comments on Hazardous Gas Pipeline Safety Rulemaking (Docket No. UG-011073). BP is involved in many aspects of the energy industry, including oil and gas exploration, production, transportation, refining, and marketing of petroleum products.

BP's supports 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 Part 192 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 Part 192 are based on sound engineering practices such as NFPA, API, ANSI, ASME, ASTM, and are based on historical industry practice.

In regards to the commissions' latest request for written comments, we wish to note some concerns with the proposed rules. Of primary concern is the possible conflict between federal and state regulations. We at BP are deeply committed to staying in full compliance with state and federal regulations and we want to help you help us by establishing clear, consistent regulations.

To date, the State has adopted 49 CFR Part 192 as general pipeline safety standards and would do well to maintain these standards and consistently apply them to the gas industry.

Secretary, Washington Utilities and Transportation Commission
February 8, 2002
Page 2 of 2

BP continues to participate in the development and improvement of industry standards. We intend to continue with interested parties and the Office of Pipeline Safety (OPS) to assure the effectiveness of new rules on public safety and environmental protection.

To ensure safe, reliable performance of our business, it is our responsibility to consider all of our resources in our decision-making as it relates to the design and construction of our facilities. For this reason, we reiterate that 49 CFR Part 192 and associated standards provide a consistent framework, which allows flexibility in addressing various pipeline operational safety issues, environmental concerns and technological options.

Pipelines designed and constructed to meet or exceed standards have a long life; however, the environment in which the pipeline resides may change over time due to natural or community actions. Ongoing pipeline integrity management programs, effective damage prevention programs, and proper community planning are necessary to maintain pipeline safety.

BP supports state participation in improving federal pipeline regulations. We encourage WUTC to continue to support improvements to federal regulations that will protect people and protect the environment nation-wide.

We are committed to working with WUTC to ensure safe pipeline operations.

Best regards,

David Knoelke
DOT Compliance Coordinator
BP Pipelines - North America

Enclosure - 10 copies