

October 13, 2000

Ms. Marilyn Showalter, Chairwoman  
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  
Docket No. TO-000712

Dear Chairwoman Showalter:

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). 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 over 10,000 miles of liquid petroleum trunk pipelines in the United States. As the new 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 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.

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 standard on pipeline integrity in high consequence areas, and provide comments to the Office of Pipeline Safety (OPS) to assure the effectiveness of new rules on public safety and environmental protection.

The two questions raised by WUTC in the September 15, 2000 notice 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

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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 detailed requirements can result in a false sense of security, since 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 which allows flexibility to address various pipeline operation, environment and technology factors.

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 and enforcing federal pipeline regulations. We encourage WUTC to continue to support improvements to federal regulations that will protect people and protect the environment nation-wide. WUTC's support of a comprehensive inspection and enforcement program would further enhance safe design and construction practices. Well-trained inspectors should continue to be a priority to ensure an effective inspection program.

We are committed to working with WUTC to ensure safe pipeline operations, through this rulemaking and other cooperative initiatives.

Best regards,

Robert C. Batch, President  
Olympic Pipe Line Company  
BP Pipelines - North America

Enclosure - 10 copies