

1.) Design and Construction

Could we insist on NTSB recommendations? Which OPS has not implemented?
Could we update our studies and research of new 'Best Technology' in the industry?
Can we better define 'Sensitive Areas', such as aquifers and Why we choose not to have petroleum products there?
Could we enforce double-wall systems in 'Sensitive Areas'.
We need seismic sensors in some areas.

2.) Operation and Maintenance

Third Party Construction or Disturbance Procedures need to be implemented, and documentation and inspection must be a high priority.

Retro-fitting out-of-date pipeline to be able to use modern safety sensors

5. Penalties and Enforcement

Stiff penalties for not reporting should be considered.
I'm afraid that \$1,000 per barrel will not pass through regulation, but maybe \$500 would.
Strict liability should be enforced, and the oil company's ability to be reimbursed from 3rd party incidents should be implemented, as long as the maps and locations are well documented.

Something I did not see addressed in this outline is Citizens' Right to Know. I bought my property adjoining the location of the proposed Thrasher's Pumpstation with no knowledge of their intent. Eight months later we found out about the proposed pumpstation during the EFSEC process. OPL's property should have been marked as a Proposed Use Site to protect folks like me. They knew about this project for several years. OPL is not required by the state to mark their projects. Neither was the previous landowner.

For that matter, they aren't required to submit maps of their pipelines. With regular staff turnover and company mergers, pipelines routes can actually get mis-located, as happened in Bellevue lately.

Another concern along this vein - is that 'abandoned' pipelines (across the nation) have been allowed to corrode and collapse and pollute because they are underground, and no one has kept records. They can be problems for years to come, and the taxpayers will ultimately be paying for their clean-up and removal, which cost should have been borne by the company who installed or used it.

Dulane Crist
4706 208th St. SE
Bothell, WA 98012
425-398-8615