

**Commissioner, Washington Utilities and Transportation Commission  
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**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 operator of Olympic Pipe Line Company, we operate 400 miles of pipeline transporting petroleum products in the States of Washington and Oregon.**

**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 CFR 49 Part 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 CFR 49 Part 195 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 regulations affecting interstate pipelines and intrastate pipelines, both of which we operate, as one pipeline system in the Olympic Pipe Line operations. In some cases, these rules conflict when addressing design, operations, maintenance, inspection and documentation requirements for liquid pipelines. Liquid pipeline companies will find it difficult to fully comply with incomplete or vague guidelines. 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 CFR 49 Part 195 as general pipeline safety standards and**

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would do well to maintain these standards and consistently apply them to the liquids industry.

In regards to the proposed rule we would like to address several sections specifically:

1. WAC 480-75-007 (Leak detection) is vague and needs to be clarified. “Small leaks” need to be defined more precisely. Furthermore, the requirement for no flow leak detection is only reasonable for short line segments, which can be positively isolated with pressure detection instruments. This section should also address record retention limits.
2. WAC 480-75-008 (Overpressure protection) we would like to point out that we believe the standard set in CFR 49 Part 195—that relief protection be set at 110% MOP—is reasonable and need not be changed in the state’s regulation. Design specifications currently employed by the industry, generally account for overpressure concerns.
3. WAC 480-75-012 (Class locations) has no equivalent in CFR 49 Part 195 and those requirements are normally reserved for gas pipeline service. We ask that the commission revisit this section with special sensitivity to its application to the liquid pipelines industry. While Olympic Pipe Line has not specifically reviewed the impacts of this requirement, such a rule could potentially impact design limits affecting crucial facilities such as our SeaTac Lateral, without direct correlation to safe and environmentally sound operations.
4. WAC 480-75-013 (Design factor (*F*) for steel pipe) diverges significantly from the standard set forth in CFR 49 Part 195.
5. WAC 480-75-014 (Backfill) needs to be clarified. One-line states “rock and hard lumps” may be acceptable provided a “mechanical shield material” is used to “protect the pipe and coating”. Another paragraph states “bedding” material requirements but is unclear about where bedding is used.
6. WAC 480-75-022 (Location of pump stations and breakout tanks for hazardous liquid pipelines) could be a severe and extremely onerous requirement causing route selection, pipeline length and cost-to-build to increase by orders of magnitude without appreciable benefit to public and environmental safety. We urge the commission to revisit this proposed rule.

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.

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**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 CFR 49, Part 195 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,**

**Tom Wicklund, PE  
Olympic Integrity Manager  
BP Pipelines - North America**

**Enclosure - 10 copies**