



OLYMPIC PIPE LINE COMPANY

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March 22, 2010

Whatcom County Planning Commission
Becky Boxx, Coordinator
Whatcom County PDS
5280 Northwest Drive
Bellingham, WA 98226

RE: Proposed Pipeline Safety & Development Changes, Docket #ZON2007-00014

Dear Ms. Boxx:

Olympic Pipe Line Company is in receipt of the Proposed Pipeline Safety & Development Changes, Docket #ZON2007-00014.

Pipeline Safety is our top priority, and we support the efforts of Whatcom County to eliminate risk to pipelines due to encroachments upon pipeline rights of way. To that end, we support the concepts proposed in this ordinance and we applaud the efforts of Whatcom County to improve pipeline safety.

There are a few areas where we would like to offer suggestions and comments on the proposed ordinance:

Development Application Submittal Requirements

Section 2, Consultation Zone. Given that the 660 foot zone on either side of the centerline of the pipeline represents a substantial area, a specific list of minor developments which would be exempted from the consultation zone distance, and/or significantly lessen the consultation zone for certain types of permits and development should be developed. This would streamline the permit process for applicants by removing a potentially time-consuming review process for pipeline operators for projects of little or no impact to the pipeline corridor.

Pipeline Corridor Protection Requirements

Section 4 (A) Reasonable Use Provision. Easements generally apply only to 100 foot or less strip of land, or some variation of width. However, some easements are "open" or "blanket" easements, and this provision lacks clarity on an appropriate protection zone. Where pipeline easements are not defined, such as in an open easement, an appropriate pipeline corridor would be not less than 50 feet, or 25 feet on either side of the center line of the pipeline.

Requirements for Land Use Compatibility

(1)(A) High Consequence Land Uses are defined as High Consequence Areas according to 49 CFR Part 195.450, and Olympic Pipe Line Company is sensitive to the possibility of overlapping federal and local regulations pertaining to the site location of new pipeline systems, or the prohibition of expansion of existing systems in High Consequence Areas where federal regulations preempt local regulations.

Definitions

The definition of Pipeline Corridor implies there are multiple pipelines running parallel to one another within certain designated area. The definition should specify "pipeline or pipelines" comprise a Pipeline Corridor.

Thank you for notifying Olympic of the opportunity to provide comments on the proposed ordinance. As the operator of Olympic Pipe Line Company since July 2000, BP's goal has always been to operate a safe, reliable pipeline that transports the Pacific Northwest's fuel every day. We always appreciate the opportunity to work with the communities in which we operate to improve pipeline and community safety.

Sincerely,



Steven Maulding
President, Olympic Pipe Line

cc: Carl Weimer