



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

December 14, 2007

Mr. Mark Sidran  
Chairman  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, WA 98502

Dear Mr. Sidran:

Between August 13-17, 2007 and August 27-31, 2007, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), evaluated the Pipeline Safety Program administered by the Washington Utilities and Transportation Commission (WUTC). The period evaluated was from January 1 through December 21, 2006. During this on-site evaluation, my state liaison representative validated performance information submitted on your Pipeline Safety Program as part of the Washington Utilities and Transportation Commission's Annual Certification under Section 60105(a), Title 49, United States Code. In addition, PHMSA's Mr. Jerry Kenerson observed your engineer, Mr. Joe Subsits, as the WUTC's lead inspector, conducting a standard inspection of BP Pipelines (North America), Inc. in Bellingham, Washington and field activities near the city of Ferndale, Washington.

Based on the Program evaluation, including validation of your Certification information and field inspection, it appears that the Washington Utilities and Transportation Commission is generally complying with the pipeline safety program requirements. During the program evaluation my state liaison also identified a few areas for potential improvement as follows:

- During the last three years, we incorporated the American Petroleum Institute's (API) RP1162 Public Awareness Programs for Pipeline Operators into our Federal regulations. This standard provides guidance on how operators can better raise safety awareness of people who work and live around the nation's pipelines. We will continue to share information with your state program office staff so they can fully reap the safety benefits of this regulatory change.
- The effects of the 2005 hurricanes and recent Alaska North Slope corrosion issues taught us the importance of a resilient and reliable energy network. We continue to work with a variety of stakeholders to streamline the federal permit process so that needed pipeline repairs are not delayed. Please inform us if any pipeline repairs mandated by your agency are delayed due to Federal permitting problems, and we will try to help resolve them.

- As reported in the past, the Common Ground Alliance (CGA) has succeeded in obtaining a three (3)-digit national one call number (811). I encourage your continued participation in CGA and hope you are supporting regional CGAs.

We continue to push for increased grant funding for the state Pipeline Safety Programs. If possible the State of Washington should increase their grant money request amount as much as necessary to cover additional goals such as inspecting Integrity Management Programs (IMP) Compliance Activities for Intrastate Gas Transmission, Intrastate Hazardous Liquid and upcoming Distribution IMP programs.

In addition to each state's unique safety issues, I would ask you to join us in continuing to consider the following issues as priorities in 2007 and 2008:

- Operator Qualification – Field validation of OQ compliance.
- IMP Compliance Activities – Participation in gas IMP inspection opportunities. Identification of potential energy impacts from planned reassessment intervals and field verification of IMP plan details, remedial measures and smart pig data interpretation.
- Public Education and Damage Prevention – Field validation of damage prevention program requirements, particularly the use of proper locating methods. Liaison with other state governmental agencies involved in public outreach activities, including the State Fire Marshal.
- Corrosion – Field and record review to ensure corrosion protection levels are maintained and problem coatings identified and addressed.

Thank you for continuing to allow Mr. Lykken to serve as an active participant in the National Association of Pipeline Safety Representatives (NAPSR) at both the national and regional levels. Mr. Lykken is to be congratulated for his continuing strong efforts to promote pipeline safety in Washington.

Mr. David Lykken and his fellow engineers are strong assets to both the Washington and Federal Pipeline Safety Programs. Thank you for supporting Washington's Acting Pipeline Safety Program Manager by allowing him to continue to train your pipeline engineers. Together they can provide more thorough pipeline inspections throughout the large state of Washington. Your continuing interest and cooperation in the Pipeline Safety Program is highly valued.

Sincerely,



Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: Mr. David Lykken, Acting Pipeline Safety Program Manager,  
Washington Utilities and Transportation Commission  
PHP-50  
PHP-500 (T. Finch)