

September 5, 2002

Mr. Allan Beshore
National Transportation Safety Board
490 L'Enfant Plaza East SW
Washington D.C. 20594-2000

Dear Allan:

Thank you for the opportunity to comment on the factual report of the Olympic Pipeline rupture, and to provide recommendations to prevent such incidents.

We do not have any substantial comments regarding the facts as presented by the National Transportation Safety Board (NTSB). We do, however, wish to make the following recommendations in the belief that they will go far in preventing a reoccurrence of what we see as a preventable rupture of a highly hazardous liquid pipeline. These recommendations are taken from our Governor's Fuel Accident Prevention and Response Team's final report, dated December 1999.

We recommend:

1. Office of Pipeline Safety (OPS) delegates to qualified states the authority to regulate interstate petroleum and natural gas pipelines using more stringent standards than those of OPS. We look to the states and OPS to foster a collegial partnership to improve pipeline safety.
2. OPS and/or delegated states establish best management practices, including contingency planning and drills, and a model franchise to be encouraged, if not required, by regulators.
3. OPS and/or delegated states provide public information on, and public participation in, pipeline contingency planning.
4. OPS and/or delegated states provide response training to local government first responders.
5. OPS and/or delegated states provide improvements in pipeline marking and mapping, and make maps easily available to the public.

Thank you for this opportunity to provide recommendations.

Sincerely,

Dale R. Jensen
Program Manager
Spill Prevention, Preparedness, and Response Program