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CASCADE COLUMBIA ALLIANCE

a coalition to assure that distribution of petroleum products is fair and environmentally responsible

20 April 20000

USDA-Forest Service
Content Analysis Enterprise Team
Attn: UFP, Building 2, Suite 295
5500 Amelia Earhart Drive
Salt Lake City, UT 84116

Dear USDA/DOI:

We have reviewed a copy of your 22 February 2000 Federal Register Notice on a notice of proposed United Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management. The following are the comments of the Cascade Columbia Alliance.

We support the assessment, protection and restoration of our public Federal lands. In particular, we support the prevention of surface and groundwater pollution that can damage public Federal lands as well as its fishery and wildlife resources. One common source of surface and groundwater pollution is from oil spills, leaks and ruptures from crude and petroleum pipelines running across public Federal lands. One example is the Yellowstone Pipeline that runs across the Lolo National Forest of Montana. This pipeline has had numerous leaks, spills and ruptures and current federal land use policies make it difficult to correct or require additional protections. Another potential water quality threat is the Cross Cascade petroleum pipeline proposed by Olympic Pipe Line Company (withdrawn after Olympic's existing I-5 pipeline ruptured and exploded on 10 June 1999 in Bellingham, WA spilling over 277,000 gallons of gasoline and killing three young people). The Cross Cascade pipeline route would have threatened the resources of the Mt. Baker-Snoqualmie and Wenatchee National Forests, as well as the Columbia River National Wildlife Refuge.

Therefore, we strongly recommend that as part of your review, that the Department of Agriculture and Department of Interior review its existing laws and regulations that govern both the granting of new pipeline easements across public Federal lands and the authorities your Departments have to inspect, shut down, require improved safety features on pipelines or otherwise protect resources, including water quality.

In particular, we would request that any Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management include the following:

- A prohibition against the siting of any new petroleum product or crude oil pipelines on public Federal Lands.
- A review of all existing petroleum product or crude oil pipelines an identification of all pipelines constructed before 1970 using low frequency ERW welded pipe. Any such pipe should be immediately replaced to prevent water pollution on public Federal Lands.

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- Require all existing pipelines on public Federal Lands to carry out hydrostatic testing as well as "smart pig" testing every three years.
- Require all existing pipelines on public Federal Lands to meet all the recommendations of the National Transportation Safety Board.
- Identify all existing pipelines that cross critical wetlands, streams and rivers, with a special emphasis on those with proposed or listed threatened or endangered species.
- Review existing right-of-way easements and charge at least $1.00 per foot/yr for crossing public Federal lands.
- Review existing pipeline river crossing and require directional drilling to replace trenched pipelines.

Also enclosed for your review is a history of pipeline leaks, spills and ruptures since 1996 when Congress last reauthorized the Federal Pipeline Safety Act, and due to oil industry pressure, significantly weakened the Act. We would further request that your Departments support a strong reauthorization of the Federal Pipeline Safety Act in Congress this year and improve the ability of federal land managers to protect public federal lands from pipeline spills.

Finally, we are concerned that too little notice time was given to the public meetings held on the proposed policy. The Federal Register notice appeared on 22 February and the first public meeting was held on 7 March in Portland, OR, only two weeks later. Two weeks is not a sufficient time for public notice for public meetings.

Thank you for the opportunity to present these comments. Please send us a copy of any final policy adopted by your Departments.

Sincerely,

Susan Harper
Executive Director
Cascade Columbia Alliance
www.pipelineleaks.com

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PIPELINE SAFETY SINCE 1996?

Prepared by David E. Ortman, Seattle, WA (206) 789-6136 for Cascade Columbia Alliance

According to a October 10, 1996 New York Times Editorial,

> *"As they rushed to adjourn, both the Senate and House slipped through a bill tailored to industry wishes that weakens current rules governing pipeline safety. President Clinton would be wise to pocket-veto the legislation by refusing to sign it. The bill would eliminate current requirements that oil and gas pipelines be inspected every two years and that maintenance workers earn Federal certification. It would require a cumbersome cost-assessment process that could invite paralyzing litigation."*

On 27 September 1996 the House of Representatives voted yeas 276, nays 126, not voting 32 and passed the "Accountable Pipeline Safety and Partnership Act of 1996" (S. 1505). This bill was so heavily lobbied by the oil industry and the Federal Office of Pipeline Safety that Rep. John Dingell (D-MI), Frank Pallone (D-NJ), Edward Markey (D-MA), Henry Waxman (D-CA), and George Miller (D-CA) signed a letter to President Clinton asking him to veto this bill. Clinton, of course, refused and signed it anyway.

This industry weakened reauthorization bill came after a devastating natural gas pipeline exploded in Edison, N.J. in March of 1994 causing extensive damage and many injuries. However, this was not enough to overcome the sheer lobbying force of the oil industry. The House vote came one day after the U.S. Senate passed S. 1505 by unanimous consent. This means there was no recorded vote and all Senators are presumed to have been in support of the industry bill.

RESULTS SINCE 1996

According to statistics from the Federal Office of Pipeline Safety, since the oil industry's successful effort to weaken the Pipeline Safety Act in 1996:

*** 1997 was the third highest year for net loss of volume spilled (120,934 bbls) since OPS began keeping records in 1986**

*** 1998 was the worst year for property damages from hazardous pipeline ruptures, spills and leaks ($57,211,497)**

*** 1999 was tied for the second worst year in fatalities (4) from pipeline accidents**

MAJOR PIPELINE DISASTERS SINCE 1996:

The following are only a few of the major pipeline disasters around the country that have taken place since 1996, in addition to the 1999 Bellingham, WA disaster. The Federal Office of Pipeline Safety does not seem to provide any information on individual pipeline accidents on its website.

2000
DELAWARE
Undetected 12 year pipeline leak

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By The Associated Press

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Millsboro, Del.--Mar 3--A small hole in an underground pipeline leaked as much as 600,000 gallons of oil over a 12-year period, threatening the nearby Indian River, state officials said.

The leak at a Conectiv power plant could rank as one of Delaware's largest, and may take several years to clean up.

"I don't know that much about the recovery process, but it sounds like a real catastrophe," said Til Purnell, a member of Friends of Herring Creek, an environmental group near the plant in southern Delaware.

KENTUCKY
Marathon Ashland spill Pipeline foes see warning

Friday, February 4, 2000
BY Mary Beth Lane
Dispatch Staff Reporter

After bubbling up from the ground in rural Kentucky last week, 573,048 gallons of crude oil flowing from a ruptured Marathon Ashland Petroleum pipeline fouled streams flowing to area farms.

That amount of oil is enough to fill almost 64 separate 18-wheel tankers, said Joe Schmidt, an environmental response-team coordinator for the Kentucky Department for Environmental Protection.

"It's certainly one of the largest" spills in Kentucky, he said, adding that the mess in rural Winchester, about 15 miles east of Lexington, is still being cleaned up.

Opponents of Marathon Ashland's proposed 130-mile underground pipeline from the Ohio River to Columbus don't like what they see of the company's Kentucky operation.

Last week's spill was the company's second in two months in Kentucky. To Ohio pipeline foe Tom Amerine, that's proof that Marathon Ashland is environmentally reckless.

"People need to wake up and realize that we're not dealing with a company that's concerned about the environment," said Amerine, a Lancaster fire lieutenant who is fighting Marathon's attempts to route the pipeline through his Hocking County farm.

PENNSYVANIA
32,000 Gallons Leak Under Ice At Wildlife Refuge

A Sunoco refinery pipeline spilled at least 32,000 gallons of crude oil beneath the ice of a frozen 145-acre pond at the John Heinz National Wildlife Refuge in southwest Philadelphia on Feb. 5. Officials are uncertain how it will affect the habitat (AP/New Jersey online, Feb. 7, 2000).

1998
GEORGIA
[From National Transportation Safety Board Website]
Pipeline Accident Brief

Pipeline Accident Number: DCA-98-MP-002
Type of System: Refined products transmission
Accident Type: Pipe failure and leak

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Location: Morgan Falls Landfill, Sandy Springs, Georgia
Date and Time: Discovered March 30, 1998; 3:48 p.m.
Owner/Operator: Colonial Pipeline Company
Fatalities/Injuries: None
Damage/Clean Up Cost: $3.2 million
Material Released: Gasoline
Pipeline Pressure: 384 psig at site of failure
Component Affected: 40-inch-diameter steel pipe

The rupture resulted in the release of more than 30,000 gallons of gasoline, about 17,000 gallons of which were eventually recovered. No alarms were detected in the control center to signify that the line had failed.
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1997
INDIANA
Pipeline Accident Brief

Accident No.: DCA-97-FP-005
Type of System: Transmission pipeline
Type of Accident: Rupture and fire
Location: Indianapolis, Indiana
Date and Time: July 21, 1997; 2:33 p.m. CST
Owner/Operator: Citizens Gas & Coke Utility
Property Damage and Losses: In excess of $2 million
Fatalities: 1
Injuries: 1
Evacuated: 75
Material Released: Natural gas
Pressure: 310 psig
Type of Failure: Excavation damage
Component Affected: 20-inch-diameter buried steel transmission pipeline

The Accident
About 2:33 p.m. on July 21, 1997, a 20-inch-diameter steel natural gas transmission pipeline owned and operated by Citizens Gas & Coke Utility Company (Citizens Gas) ruptured and released natural gas near an intersection adjoining the Charter Pointe subdivision in Indianapolis,
Indiana. The gas ignited and burned, killing one resident and injuring another. About 75 residents required temporary shelter. Six homes were destroyed, and about 65 others sustained damage significant enough to be documented by the local investigation team.
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1996
SOUTH CAROLINA
Pipeline Accident Report
Pipeline Rupture and Release of Fuel Oil into the Reedy River at Fork Shoals, South Carolina
June 26, 1996

NTSB Number PAR-98/01

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NTIS Number PB98-916502

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Abstract: About 11:54 p.m. eastern daylight time on June 26, 1996, a 36-inch-diameter Colonial Pipeline Company pipeline ruptured where a corroded section of the pipeline crossed the Reedy River at Fork Shoals, South Carolina. The ruptured pipeline released about 957,600 gallons of fuel oil into the Reedy River and surrounding areas. The estimated cost to Colonial for cleanup and settlement with the State of South Carolina was $20.5 million.

TENNESSEE
Pipeline Accident Brief

Pipeline Accident Number: DCA-97-FP-002
Type of System: Hazardous liquid petroleum products
Accident Type: Overpressure rupture
Location: Murfreesboro, Tennessee
Date and Time: November 5, 1996, about 9:36 a.m. EST
Owner/Operator: Colonial Pipeline Company
Fatalities/Injuries: None
Property Damage: $5.7 million
Material Released: Diesel fuel
Quantity Released: About 84,700 gallons (about 2,017 barrels)
Pipeline Pressure: Approximately 1,820 psig
Component Affected: 8-inch diameter, Grade X-42, 0.188 inch wall thickness, Electric Resistance Weld (ERW) steel pipe

The Accident
On the morning of November 5, 1996, Colonial Pipeline Company (Colonial) was preparing to perform a maintenance operation that required that a section of pipeline be isolated and purged of product, which in this case was diesel fuel. The pipeline involved was 8-inch-diameter steel pipe used to transport hazardous liquid petroleum products from Colonial's Atlanta Junction in Georgia to its Nashville, Tennessee, delivery facility. (See figure 1.)

Colonial reported a release of approximately 84,700 gallons (2,017 bbl.) of diesel fuel.

FEDERAL OFFICE OF PIPELINE SAFETY TABLES
HAZARDOUS LIQUID PIPELINE OPERATORS
ACCIDENT SUMMARY STATISTICS BY YEAR
01/01/1986 TO 12/31/1999

Year	No. of Incidents	Fatalities	Injuries	Property Damage	Net Loss bbls
1986	209	4	32	$16,027,846	75,764
1987	237	3	20	$13,140,434	312,794
1988	193	2	19	$32,414,912	115,586
1989	163	3	38	$8,813,604	121,179
1990	180	3	7	$15,720,422	54,663
1991	216	0	9	$37,788,944	55,774
1992	212	5	38	$38,651,062	68,742

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1993	229	0	10	$28,873,651	57,559
1994	245	1	7*	$56,503,604	112,389
1995	188	3	11	$32,518,689	53,113
1996	193	5	13	$49,662,544	96,140
1997	171	0	5	$36,511,649	120,934
1998	154	1	2	$57,211,497	60,937
1999	152	4	19	$36,239,957	92,173
Totals	2,741	35	234	$461,159,091	1,397,747

Historical totals may change as OPS receives supplemental information on accidents.

* Does not include 1,851 injuries that required medical treatment reported for the October, 1994 accidents caused by severe flooding near Houston, Texas.
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1996- FEDERAL OFFICE OF PIPELINE SAFETY
HAZARDOUS LIQUID PIPELINE
ACCIDENT SUMMARY BY CAUSE
1/1/96 - 12/31/96

CAUSE	# OF INCIDENTS	% OF TOTAL	BARRELS LOST	PROPERTY DAMAGES	% OF TOTAL	DEATHS	INJURIES
Internal Corrosion	21	10.99	8,481	$2,247,531	5.57	0	0
External Corrosion	38	19.90	44,846	$11,519,740	28.55	0	0
Defective Weld	9	4.71	4,111	$1,390,317	3.45	0	0
Incorrect Operation	11	5.76	4,224	$2,750,000	6.82	0	0
Defective Pipe	9	4.71	1,888	$2,123,000	5.26	0	0
Outside Damage	48	25.13	66,906	$7,409,447	18.36	3	10
Malf. of Equipment	6	3.14	1,969	$224,627	0.56	0	0
Other	49	25.65	14,903	$12,685,500	31.44	2	3
TOTAL	191		147,328	$40,350,162		5	13

* Historical totals may change as OPS receives supplemental information on incidents.

1997 - FEDERAL OFFICE OF PIPELINE SAFETY
HAZARDOUS LIQUID PIPELINE
ACCIDENT SUMMARY BY CAUSE
1/1/97 - 12/31/97

Cause	# of Incidents	% of Total	Barrels Lost	Property Damages	% of Total	Fatalities	Injuries
Internal Corrosion	18	10.2	39,509	$1,279,646	3.50	0	0
External Corrosion	34	19.4	34,344	$7,717,180	21.11	0	0
Defective Weld	3	1.7	8,730	$227,494	0.62	0	0

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Incorrect Operation	11	6.2	9,487	$1,310,450	3.58	0	0
Defective Pipe	11	6.2	8,639	$2,278,100	6.23	0	0
Outside Damage	40	22.8	36,951	$14,980,076	40.97	0	4
Malf. of Equipment	7	4.0	11,472	$52,219	0.14	0	0
Other	51	29.1	22,234	$8,720,130	23.85	0	1
TOTAL	175		171,366	$36,565,295		0	5

* Historical totals may change as OPS receives supplemental information on accidents.

1998 - FEDERAL OFFICE OF PIPELINE SAFETY
HAZARDOUS LIQUID PIPELINE
ACCIDENT SUMMARY BY CAUSE
1/1/98 - 12/31/98

Cause	# of Incidents	% of Total	Barrels Lost	Property Damages	% of Total	Fatalities	Injuries
Internal Corrosion	20	12.9	4,835	$15,761,931	27.52	0	0
External Corrosion	20	12.9	6,834	$2,270,000	3.96	0	0
Defective Weld	6	3.9	1,747	$1,670,100	2.92	0	0
Incorrect Operation	7	4.5	18,223	$216,950	0.38	1	0
Defective Pipe	7	4.5	6,265	$2,425,000	4.23	0	0
Outside Damage	41	26.6	56,757	$28,905,554	50.46	1	5
Malf. of Equipment	9	5.8	11,479	$73,000	0.13	0	0
Other	44	28.5	43,105	$5,957,962	10.40	0	1
TOTAL	154		149,245	$57,280,497		2	6

* Historical totals may change as OPS receives supplemental information on accidents.

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