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Hello,

The proposed \$300 million maximum financial responsibility requirement for Class 1 facilities is not enough. At the very least, refineries, pipelines, and other bulk oil handling facilities should be required to have the same financial responsibility requirements as tank vessels and barges: \$1 billion per facility.

Financial responsibility requirements should prioritize sufficient compensation for oil spill impacts over oil industry profits. Tank vessels and barges can comply with the \$1 billion financial responsibility requirement through P&I (protection & indemnity) clubs or mutual insurance associations. Class 1 facilities could do the same.

Canada's Trans Mountain Pipeline (Puget Sound), which transports Alberta tar sands to Washington State's northern refineries, should have a financial responsibility requirement that is based on a higher per barrel amount in order to address the higher oil spill response and damage costs for spills of tar sands products. The basis for the Trans Mountain Pipeline's financial responsibility requirement should be increased to at least \$60,153 per barrel.

Best,  
David