



1220 L Street, Northwest  
Washington, DC 20005-4070  
Tel 202/682-8153  
Fax 202/962-4797  
E-mail sampson@api.org

④  
Tim Sampson  
Coordinator, Drilling and  
Production Operations

October 19, 2000

Department of the Interior  
Minerals Management Service  
Mail Stop 4024  
381 Elden Street  
Herndon, Virginia 20170-4817

RULES PROCESSING TEAM

OCT 16 2000

Attention: Rules Processing Team

Dear Sir or Madam:

On June 21, 2000 the Minerals Management Service (MMS) published a notice of proposed rulemaking to amend regulations on oil and gas drilling operations on the Outer Continental Shelf (OCS). The MMS has requested that comments be submitted to the agency by October 19, 2000.

API represents over 500 companies involved in all aspects of the oil and gas industry, including exploration, production, transportation, refining and marketing. Many of our members conduct operations on the OCS and will be impacted by changes to the existing requirements for OCS oil and gas drilling operations.

We appreciate the agency's ongoing cooperation with the industry during this process. Also, we commend the MMS for its efforts at converting the rule to "plain language," updating the rule to address changes in drilling technology, and moving from prescriptive to performance based requirements.

API worked jointly with the Offshore Operators Committee (OOC) in preparing detailed comments to the agency, and fully supports and endorses the comments that have been submitted by that organization.

Sincerely,

An equal opportunity employer