

DEC - 5 2003

**Baker Energy**

A Unit of Michael Baker Corporation

16340 Park Ten Place, Suite 320  
Houston, Texas 77084(281) 579-7850  
FAX (281) 579-4545

December 4, 2003

Department of the Interior  
Minerals Management Service (MS 4024)  
Attn: Rules Processing Team (Comments)  
381 Elden Street  
Herndon, VA 20170-4817Re: RIN 1010-AC57; NPRM Incident Reporting  
FR 68-40585

Ladies and Gentlemen:

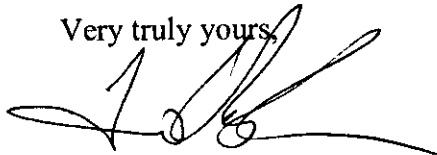
Baker Energy appreciates this opportunity to provide written comments on the subject proposed rule to amend regulations regarding the reporting of incidents associated with Outer Continental Shelf oil and gas and other mineral operations as published in the July 8, 2003 Federal Register.

Baker Energy supports the comments submitted by the Offshore Operators Committee (OOC). We believe that the proposed rulemaking on incident reporting falls short in many areas and is overly burdensome with little benefit. The proposed rule is highly prescriptive and the multiple reporting requirements and timeframes are complex and confusing.

We urge MMS to work with both the USCG and industry stakeholders to propose an incident reporting system that provides for single point reporting to both MMS and USCG, is based on a system of reporting certain incidents while recording other incidents and places the responsibility for lessees/operators to report platform incidents and vessel owners/operators to report vessel incidents.

Again, Baker Energy appreciates the opportunity to provide comments on this important rulemaking.

Very truly yours,

Tad LeBlanc  
HSE&C Manager  
Baker Energy