

Chevron U.S.A. Inc.
935 Gravier Street
New Orleans, LA 70112
Tel (504) 592-6917

Michael Power
Manager, Health, Environmental & Safety

RULES PROCESSING TEAM

DEC 04 2003

December 3, 2003

ChevronTexaco

Department of the Interior
Minerals Management Service (MS 4024)
Attn: Rules Processing Team (Comments)
381 Elden Street
Herndon, VA 20170-4817

Re: RIN 1010-AC57; NPRM Incident Reporting
FR 68-40585

Ladies and Gentlemen:

Chevron U.S.A. Inc. 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.

Chevron U.S.A. Inc actively participated in the development and supports the comments submitted by the Offshore Operators Committee (OOC). 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.

As a participant on the National Offshore Advisory Committee (NOSAC), Chevron U.S.A Inc. supports the MMS in implementing a much needed and improved incident reporting process. A more cost effective solution could be developed by the MMS working with both the USCG and industry stakeholders to propose an incident reporting system that provides for single point reporting to both MMS and USCG based on a system of reporting certain incidents while recording other incidents. Lessee/operators would have the responsibility for reporting platform incidents and vessel owners/operators would be responsible for reporting vessel incidents.

Chevron U.S.A. Inc recommends that the MMS withdraw this rulemaking and utilize a team of MMS, USCG and industry stakeholders in developing an improved incident reporting process based on the recommendations contained in the NOSAC report.

Again, Chevron U.S.A. Inc. appreciates the opportunity to provide comments on this important rulemaking.

Very truly yours,



Michael Power