



KERR-McGEE OIL & GAS CORPORATION

16666 Northchase · Houston, Texas 77060

RULES PROCESSING TEAM

DEC - 5 2003

Cary V. Bradford
Manager of Regulatory Affairs
GOM and North America Region

Phone: 281/673-6338
Fax: 281/673-4338

December 04, 2003

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:

Kerr-McGee Oil and Gas Corporation (Kerr-McGee) 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.

Kerr-McGee supports the comments submitted by the Offshore Operators Committee (OOC). We believe that the proposed rulemaking misses the opportunity to simplify the process and improve the quality and content of the data. 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, Kerr-McGee appreciates the opportunity to provide comments on this important rulemaking.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Cary V. Bradford'.

Cary V. Bradford