

# NEWFIELD



**RULES PROCESSING TEAM**

**DEC 01 2003**

David A. Trice  
President & Chief Executive Officer

November 17, 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:

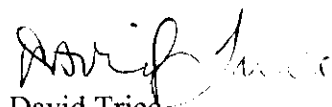
Newfield Exploration Company (Newfield), appreciates this opportunity to provide written comments on the subject proposed rule to amend regulations regarding the reporting of incidents associated with Outer Continental Shelf oil and gas and other mineral operations as published in the July 8, 2003 Federal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

Newfield strongly agrees with and supports the comments submitted by the Offshore Operators Committee (OOC). Our personnel were involved in the development of the OOC comments and therefore we feel there is no need to restate those points again here. We do believe that 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 the MMS to work with 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, Newfield appreciates the opportunity to provide comments on this important rulemaking.

Very truly yours,



David Trice  
President and CEO