

DEC 02 2003

ROWAN COMPANIES, INC.  
2800 POST OAK BOULEVARD, SUITE 5450  
HOUSTON, TEXAS 77056-6127

November 26, 2003

CERTIFIED MAIL

Return Receipt Requested

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:

Rowan Companies, Inc. (Rowan) is a provider of domestic and international drilling and aviation services. Additionally, the company also operates a mini-steel mill; a manufacturing facility that produces heavy equipment for the mining, timber and transportation industries; and a drilling products division that has designed or built approximately one-third of all mobile offshore jack-up drilling rigs. The company operates twenty-four (24) Mobile Offshore Drilling Units (MODUs), twenty-two (22) of which are located in the Gulf of Mexico.

Rowan 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.

The undersigned was privileged to assist in the preparation of the comments submitted by the Offshore Operators Committee (OOC), as well as those that will be forwarded by the International Association of Drilling Contractors (IADC). We endorse the comments of both of these trade associations.

We 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.

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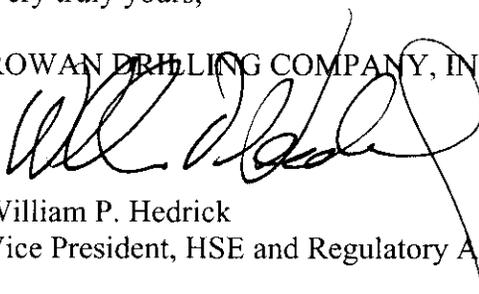
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We urge Minerals Management Service (MMS) to work with both the U.S. Coast Guard (USCG) and industry stakeholders to propose an incident reporting system that provides for single point reporting to both agencies and is based on a system of reporting certain incidents while recording other incidents. Moreover, any final rule must place the responsibility for lessees/operators to report platform incidents and for vessel owners/operators to report vessel-related incidents.

Again Rowan appreciates the opportunity to provide comments on this important rulemaking.

Very truly yours,

ROWAN DRILLING COMPANY, INC.



William P. Hedrick  
Vice President, HSE and Regulatory Affairs