

RULES PROCESSING TEAM

DEL 0 1 2003

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November 24, 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:

WJP Enterprises 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.

WJP Enterprises supports the comments submitted by the Offshore Operators Committee (OOC). We believe that that the proposed rulemaking on incident reporting falls short in many areas and is overly burdensome on MMS, USCG and industry with little benefit.

We urge MMS to work with USCG and industry to propose an incident reporting system that provides for single point reporting to both MMS and USCG, is based on OSHA's 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.

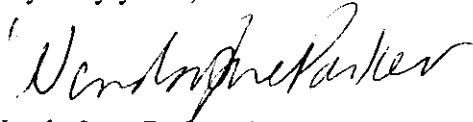
In specific, WJP Enterprises has these particular concerns with the proposed rulemaking.

1. The rule proposes six different verbal or written reporting timeframes to MMS. This is overly complicated and burdensome. Oral reports should be limited to the most serious of incidents, such as fatalities and multiple injuries requiring hospitalization, and the remaining incidents should be recorded. An annual report of all recordable incidents could be provided to MMS. This would be similar to incident reporting requirements by OSHA and DOT.
2. The personal injury categories are not realistic for reporting purposes. Many of the categories are very subjective. Since they do not align with OSHA reporting and recording requirements, it makes it impossible to correlate statistics across industries.
3. The MMS and USCG requirements need to be aligned and they need to share incident reports. Lessees or operators should not be responsible for reporting incidents to or on

vessel or vessel personnel, nor should vessels be responsible for reporting incidents on facilities or to facility personnel.

If you have any questions, or need any additional information, please contact me at 972-516-1177.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Wanda June Parker".

Wanda June Parker, P. E.  
WJP Enterprises