

# W&T OFFSHORE

I N C O R P O R A T E D

June 5, 2007

United States Department of the Interior  
Minerals Management Service (MS 4024)  
381 Elden Street  
Herndon, Virginia 20170-4817

ATTENTION: Rules Processing Team

RE: RIN 1010-AD 12; 30 CFR Subpart K - Venting and Flaring  
March 6, 2007 Federal Register Volume 72, No. 43

Dear Sir or Madam:

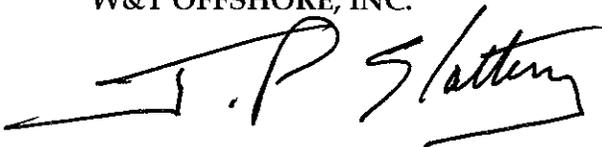
W&T Offshore, Inc. (W&T) appreciates the opportunity to provide written comments on the above-referenced proposed rule to amend regulations regarding production rates, burning oil, and venting and flaring of natural gas associated with Outer Continental Shelf oil and gas operations. W&T owns and/or operates over 300 facilities on the Outer Continental Shelf, and is the third largest lessee. The proposed rule will significantly affect our operations.

As a member of the Offshore Operators Committee (OOC), W&T has been actively involved in the review and preparation of comments submitted by the OOC in this matter. W&T strongly supports the comments submitted by the OOC and urges the MMS to carefully consider the issues presented accordingly. More specifically, we would like to emphasize the comments relative to installation of flare/vent meters on facilities that process greater than 2,000 BOPD. W&T currently operates at least three (3) facilities that produce/process greater than 2,000 BOPD. Compliance with the proposed rule as currently written is not achievable for all of the reason enumerated in the OOC comments. Even if the 2% meter accuracy was achievable (which it is not as contemplated by the proposed rule), it is our opinion that the time to comply and the cost to comply with in the proposed rule has been greatly underestimated. Our cost estimate to install flare/vent meters on our three existing shelf facilities exceeds \$1 million - that is, if the current platform configurations can safely accommodate the additional piping that would be required.

Thank you again for the opportunity to submit comments. Should you have any questions, please contact either the undersigned or Ms. Bea Stong, W&T's Health, Regulatory & Environmental Manager, at (713) 626-8525.

Yours truly,

W&T OFFSHORE, INC.



J.P. Slattery, Senior Vice President - Operations

cc: Mr. Allen Verret, OOC