
To: **Date:** June 25, 2007
From: L. A. Salinas **Place:** Operations/Engineering

**SUBJECT: DRAFT COMMENTS ON Dept. of the Interior
MMS NOPR
DOCKET NO. RIN 1010-AD17**

Open and Non-discriminatory Movement of Oil and Gas as Required by the Outer Continental Shelf Lands Act

General Comments

This proposed action appears consistent with the Agency's other actions in regard to the OCS Oil and Gas Leasing Program

1. Methods of Delivery Assurance

MMS should consider other methods of delivery assurance, such as electronic transmission in addition to telephonic and written, in order to satisfy the parties' complaint and answer notification requirements.

2. Formal Complaint Process

At this time, we do not feel that a formal complaint resolution process, other than that proposed, is warranted.

3. MMS's Treatment of OCSLA pipelines and FERC exercise of the Natural Gas Act

We agree that in regard to this proposed resolution method, MMS's proposed treatment of OCSLA pipelines over which FERC exercises its Natural Gas Act or Interstate Commerce Act jurisdiction is adequate.

4. Time Limit on Filing of Complaints

We agree that that the MMS should impose a time limit on the filing of complaints -- possibly 60-90 days would be reasonable.

5. Response should include Specific Information

An answer in response to a claim should include specific information other than that required by the proposed rule, if it will expedite the resolution of the complaint.

6. Processing Fee

We have no specific comment.

7. Material Affect of the Processing fee to the Complaint Process

We have no specific comment.

8. Processing Fee Waiver

We defer to the Agency on this provvison and have no further comment.

9. Information Sought from Persons who are not a Party to the Complaint.

The MMS may gather information from sources, even outside of the complaint. However, it should in all cases maintain the confidentiality rights of all outside parties.

10. Automatic Stay Pending an Appeal

We have no comment.

L. A. Salinas

C: (via e-mail) w/o attachments

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