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June 10, 2004

Director, Minerals Management Service
Attention: Policy and Management Improvement
1849 C Street, NW, Room 4223
Washington, DC 20240-0001

RE: Advance Notice of Proposed Rule Making relating to Open and Non-Discriminatory
Movement of Oil and Gas as Required by the Outer Continental Shelf Lands Act

Gentlemen:

We welcome the opportunity to present our comments to the Minerals Management Service ("MMS") concerning its advance notice of proposed rulemaking relating to open and non-discriminatory movement of oil and gas as required by the Outer Continental Shelf Lands Act ("OCSLA"). Representatives of Vision Resources, Inc. ("Vision") presented oral comments at the MMS meetings held in Houston, Texas (April 27, 2004) and Washington, D.C. (May 11, 2004). Vision is the oil marketing affiliate of Walter Oil & Gas Corporation ("Walter") an independent exploration and production company owning and operating over one hundred federal leases in the Gulf of Mexico ("GOM"). Vision is a shipper on many of the common carrier oil pipelines in the GOM. Our comments shall focus specifically on oil pipeline transportation issues in the GOM.

In brief, Vision does not believe that open and non-discriminatory oil pipeline transportation is widely available in the GOM. Pipeline transportation of oil is vastly different than that for natural gas and while the Federal Energy Regulatory Commission ("FERC") has significant jurisdiction and oversight over natural gas pipelines it does not have this same authority over oil pipelines. Today, in our view, there is no federal regulatory agency exercising any jurisdiction and oversight over tariffs charged by oil pipelines nor ensuring open and non-discriminatory access in the GOM. In fact FERC has denied they have any jurisdiction over these issues regarding oil pipelines and as a result some oil pipelines have withdrawn their previously filed FERC tariffs.