

Shell Exploration & Production Company



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RULES PROCESSING TEAM

~~JAN 13 2003~~

March 10, 2003

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Virginia 20170-4817

RULES PROCESSING TEAM

MAR 13 2003

**RE: FR 1808 – 1811; January 14, 2003
Documents Incorporated by Reference
API RP 14F and API RP 14FZ**

Gentlemen;

Shell Exploration & Production Company and other affiliates of Shell Oil Company (all referred to as "Shell") appreciates the opportunity to comment on the Notice of Proposed Rulemaking for Oil and Gas and Sulphur Operations in the Outer Continental Shelf--Documents Incorporated by Reference--API RP 14F and API RP 14FZ. Being actively involved in oil and natural gas development projects, Shell is very interested in the proposed regulations.

Shell supports the incorporation of API Recommended Practices 14F and 14FZ into MMS regulations.

If you have any questions or need further clarification, please do not hesitate to call me, or Rick Meyer at (504) 728-6393.

Very truly yours,

A handwritten signature in black ink that reads "Peter Velez".

Peter K. Velez
Manager, Regulatory Affairs, and Incident Command

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes that this is crucial for ensuring transparency and accountability in the organization's operations.

2. The second part of the document outlines the various methods and tools used to collect and analyze data. It highlights the need for consistent data collection procedures and the use of advanced analytical techniques to derive meaningful insights from the data.

3. The third part of the document focuses on the role of technology in data management and analysis. It discusses how modern software solutions can streamline data collection, storage, and processing, thereby improving efficiency and accuracy.

4. The fourth part of the document addresses the challenges associated with data management, such as data quality, security, and privacy. It provides strategies to mitigate these risks and ensure that the data remains reliable and secure throughout its lifecycle.

5. The fifth part of the document concludes by summarizing the key findings and recommendations. It stresses the importance of a data-driven approach in decision-making and the need for continuous monitoring and improvement of the data management process.