

**ExxonMobil Production Company**  
U.S. Production  
P.O. Box 4697  
Houston, Texas 77210-4697

**RULES PROCESSING TEAM**

**DEC - 5 2003**

**ExxonMobil**  
*Production*

December 4, 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 Report  
FR 68-40585

Ladies and Gentlemen:

ExxonMobil Production Company 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.

ExxonMobil participated in the development of and supports the comments submitted by the Offshore Operators Committee (OOC). We believe that the proposed rulemaking on incident reporting is overly burdensome with little benefit. The proposed rule is highly prescriptive and the multiple reporting requirements and timeframes are complex and confusing.

We urge MMS to work with both the USCG and industry stakeholders to develop an incident reporting system that provides for single point reporting to both MMS and USCG. This system should be based on 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 addition to the recommendations included in the OOC submittal, it is suggested that the proposed 30 CFR 250.190(a)(1) be revised or deleted. Requiring that the initial report of some incidents be electronically submitted within 12 hours (proposed in 30 CFR 250.189(a)(1)-(a)(4)) will require operators to revise policies, processes, purchase equipment, etc., for facilities that do not have electronic reporting capability. An oral report within 12 hours, followed by the follow-up report within 5 days is more realistic. Additionally, it is not clear as to the need of submitting this initial electronic written report in 12 hours, since the proposed 30 CFR 250.190 (a)(4) requires only sections 1-2 of MMS Form 142 be used, which provides very little information on the incident.

Again, ExxonMobil appreciates the opportunity to provide comments on this important rulemaking. If you have questions or need additional information, please contact Mr. Steve Brooks at (504) 561-4753.

Very truly yours,

EXXON MOBIL CORPORATION

By: 

E. M. Shipp  
ExxonMobil Production Company  
(a division of Exxon Mobil Corporation)

TSB:dpp