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March 14, 2008

Department of the Interior  
Minerals Management Service (MS 4024)  
Attn: Rules Processing Team (Comments)  
381 Elden Street  
Herndon, VA 20170-4817

Re: RIN 1010-AD 11; Sub Part J-Pipelines and Pipeline Rights-of-Way  
FR Vol. 72, No. 191 10-03-07

Ladies and Gentlemen:

Chevron U.S.A. Inc., hereafter referred to as Chevron, appreciates this opportunity to provide written comments on the subject proposed rule to amend regulations regarding pipeline and pipeline rights of way associated with Outer Continental Shelf oil and gas and other mineral operations as published in the October 3, 2007 Federal Register. Additionally we applaud the MMS for extending the commenting period and affording Industry an opportunity to share concerns in the technical workshop held on Feb 22, 2008 in New Orleans, LA.

Chevron recognizes that the MMS has conducted a significant rewrite of Subpart J using plain language and incorporating content of numerous NTLs with the intention of improving readability, and simplifying compliance. While some improvements may have been achieved in that regard, we have serious concerns with the more prescriptive requirements imposed on Industry in the areas of reporting, documentation and recordkeeping. The proposed requirements far exceed those in place today with questionable value to be derived by the expanded regulatory oversight. Chevron believes that the proposed rule contradicts the 1996 Memorandum of Understanding (MOU) between Department of Transportation (DOT) and the Department of the Interior (DOI) governing their respective responsibilities on the OCS and will have significant adverse impact to the critical cycle time of new deepwater projects in the Gulf of Mexico thus negatively impact development on energy reserves on the US OCS.

Attached Chevron provides specific comments on the proposed rule. We support the Agency's effort to improve the effectiveness of the regulations in the areas of safety and reliability while continuing to promote timely development of resources on the OCS. We encourage the Agency

to carefully consider these comments in the development of an effective final rule. If you have any questions regarding our comments, please feel free to contact me at (504) 592-6095.

Sincerely,

Sandi Fury  
Sr. Advisor, Regulatory/Advocacy  
Chevron GOM SBU

Attachment Enclosed