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March 17, 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:

Targa Midstream Services Limited Partnership (“Targa”) appreciates this opportunity to provide written comments on the proposed rule making referenced above to amend regulations regarding pipeline and pipeline rights of way associated with Outer Continental Shelf (“OCS”) oil and gas and other mineral operations, as published in the October 3, 2007 Federal Register.

Targa recognizes that in the proposed rule making the Minerals Management Service (“MMS”) has conducted a significant rewrite of Subpart J of its regulations using plain language and that it has restructured its rules to improve readability and consolidated numerous Notice to Lessees and Operators (“NTLs”) that were in effect. By incorporating into the proposed rules the numerous NTLs that clarify the current regulations, MMS will reduce the burden on industry to keep track of rules from various sources and help simplify compliance.

Targa appreciates that MMS rewrote the proposed rules focusing each section on a single topic, and Targa believes that the proposed rules are better organized to reflect actual sequences of events that occur within our industry.

Targa notes, however, that unlike recent rule making efforts, this effort clearly attempts to more rigidly prescribe new reporting, documentation and record keeping requirements far above current levels. The new rules have the potential to multiply the amount of information submitted to the MMS’ GOM Region Pipeline Group. Further, such data has questionable value from the standpoint of regulatory oversight. The rules take the position of being more interactive to the point of requiring information on a time line that could prove impractical or slow down the development process such that permitting is the critical path in lieu of actual design, construction, installation and operation. Targa appreciates that MMS rewrote the proposed rules to consolidate and streamline such rules, but the many authors of the new rule also added significant new requirements that industry believes have little value in light of our current, safe operating record.

Targa believes that the proposed rules are broadly targeted at three critical areas: safety, reliability, and the environment. Targa agrees that these areas are important to the industry, customers, the general public, and regulators. With this in mind, Targa would like to know specifically where the MMS believes the industry is falling short of expectations in these areas and why the MMS has not shared this information in the rule making. .

The comment period allocated for industry’s response to such a significant formal rule making on Sub Part J did not allow Targa to develop detailed comments on the various parts of the rule making, thus Targa recommends that further discussions with industry be carried out prior to any final rule making on the issues.

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Targa notes that the proposed rule making would create numerous conflicting and duplicative requirements between the Department of Transportation (“DOT”) and the Department of Interior (“DOI”). Consequently, Targa believes that the proposed rule making creates confusion, inconsistency, and redundancy for offshore pipeline operators. Additionally, such requirements would create jurisdictional overlaps and conflicts between the two agencies. Targa believes the proposed rule making contradicts the 1996 Memorandum of Understanding between DOT and DOI governing their respective responsibilities on the OCS.

Targa has noted that the new rules define a larger, more proactive role for the MMS Pipeline Group in existing pipeline operations and a significant upturn on the amount and technical detail of information that would be required to be developed, recorded and reported without a strong driver for the additional information. Targa is concerned that this new role will have a negative impact on critical cycle times in the ongoing development of the OCS.

Targa generally supports the recommendations developed by the Offshore Operators Committee (“OOC”) ad hoc team in addressing the rule making and urges the MMS to review the recommendations outlined in the OOC’s letter of March 12, 2008.

If you have any questions, please contact me at (337) 583-4642, extension 200.

Very truly yours,

Targa Midstream Services Limited Partnership

/s/ Tim Huffer

Tim Huffer
Manager, Regulatory Compliance

cc: Cary Loughman, Targa Midstream Services Limited Partnership