



TAYLOR
ENERGY COMPANY LLC

March 17, 2008

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

VIA Fax: 703-787-1209

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:

Taylor Energy Company LLC (Taylor Energy) 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.

Taylor Energy acknowledges that MMS, through the proposed rule making, has conducted a significant rewrite of Subpart J by restructuring the rule to improve readability, using plain language, and incorporating numerous Notices to Lessees and Operators (NTLs) that are in effect. By incorporating into the proposed rule the numerous NTLs that clarify the current regulation, MMS will reduce the burden on industry to keep track of rules from various sources and help simplify compliance. Taylor Energy appreciates that MMS wrote the proposed rule focusing each section on one topic and organizing the rule to better reflect the actual sequence of activities that occur within our industry for the lifecycle of a pipeline from concept through abandonment.

However, Taylor Energy notes that, unlike the trend of other recent rule making efforts, this proposed rule requires new additional reporting, documentation and record keeping that are much more prescriptive than the current rule. Along with these new requirements is a general reduction in time allowed for submittal of information. This is of great concern because our current experience with timely turnaround of permit applications with the GOM Region Pipeline Group has not been satisfactory. The proposed rule requires multiple submittals through the design, fabrication, and installation phases of a pipeline on a time line that could prove impractical or slow down the development process such that permitting becomes the critical path on a pipeline project. The need for much of the additional required information seems questionable

for regulatory oversight. Taylor Energy appreciates that MMS rewrote the proposed rule to consolidate and streamline, but the many authors of the new rule have added significant new requirements that industry must challenge the value of in light of our current safe operating record.

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

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

Taylor Energy has noted that the proposed rule defines a larger, more proactive, role for the MMS Pipeline Group in existing pipeline operations, and a significant increase in the amount and technical detail of information that would be required to be developed, recorded, and reported, without a demonstrated need for the additional information. Taylor Energy is concerned that this new role will have a negative effect on critical cycle times in the ongoing development of the OCS.

The comment period allocated for industry's response to such a significant formal rule making on Sub Part J did not allow Taylor Energy to develop detailed comments on the various parts of the rule making and it is recommended that further discussions with industry be carried out prior to any final rule making on the issue. However, Taylor Energy generally supports the recommendations developed by the Offshore Operators ad hoc team in addressing the rule making and urges the MMS to review the recommendations outlined in the OOC's March 2008 letter.

If you have any questions, please contact me at (504) 581-5491.

Very truly yours,



W. Denton Copeland
Vice President - Operations