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CORPORATION**

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

Subj: Proposed Rule on API Spec 2C Incorporation by Reference

Nabors Offshore Corporation (NOC) submits the following comments regarding the proposed rule, which would incorporate by reference API Specification 2C into the Minerals Management Service (MMS) regulations.

NOC operates forty (40) offshore cranes, which are installed on platforms as part of a temporary drilling, completion or workover package. All of these cranes have been designed and constructed using the API Specification 2C, edition in use at the time of construction.

It is the opinion of NOC that cranes in use offshore at this time should be grandfathered. All new crane installations made after the effective date of the final rule would be required to meet the requirements of API Spec 2C, Fifth Edition, 1995. Regarding temporary cranes, only the actual installation and load testing should be required to meet the specifications in API Spec 2C, Fifth Edition, 1995.

NOC uses a third party crane servicing company to conduct the initial load test of all temporary crane installations on fixed platforms and would recommend this be done for initial installations on all platform cranes.

In the case of the anti-two block safety device installation, which should be installed on all offshore cranes, a 1-year transition period for installation would be sufficient.

Incorporating API Spec 2C into the MMS regulations will increase safety on the OCS.

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