



OFFSHORE OPERATORS COMMITTEE

October 16, 2001

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, VA 20170

Attention: Rules Processing Team (RPT)

30 CFR 250
66 FR 37611; July 19, 2001
Document Incorporated by Reference
American Petroleum Institute
Specification 2C for Offshore
Cranes (API Spec 2C)

Gentlemen:

The Offshore Operators Committee (OOC) appreciates the opportunity to provide written comments on the proposed rulemaking to incorporate by reference the Fifth Edition of the American Petroleum Institute's Specification for Offshore Cranes (API Spec 2C) into Minerals Management Service (MMS) regulations.

The OOC is a trade organization of 107 members and associates that represents virtually all of the oil and gas production in the Gulf of Mexico (GOM). OOC comments are made without prejudice to any member's right to have or express different or opposing views.

The OOC commends the MMS for incorporating industry standards into its offshore operating regulations to improve safety on the OCS. However, OOC is concerned about the impact of this regulation on existing OCS cranes (i.e., transition time and capability to equip with anti-two block safety device) and also with the significant administrative burden increase associated with maintaining crane records. The attached comments and responses to the questions included in the MMS proposal represent a consolidated summary of the companies participating in the review of the proposed rule. Individual companies may also be submitting comments addressing this rulemaking.

If you have any questions or need additional information regarding these comments, contact the undersigned at 504-561-2427 or Steve Brooks at 504-561-4753.

Yours Truly,

A handwritten signature in black ink, appearing to read "Allen J. Verret".

Allen J. Verret
Executive Director
Offshore Operators Committee