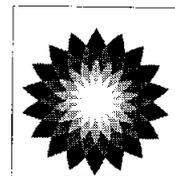


bp
Leon Hirsch

Manager, Land and Negotiations
Gulf of Mexico



BP America Production Company
BP Exploration & Production Inc.
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September 16, 2002

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Attention: Rules Processing Team

BP Exploration & Production Inc. Comments Oil and Gas and Sulphur Operations in the Outer Continental Shelf; Geological and Geophysical (G&G) Explorations Of the Outer Continental Shelf – Proprietary Terms and Data Disclosure Proposed Rulemaking. 67 CFR 46942 (July 17, 2002)

Ladies and Gentlemen:

BP, and its affiliated companies, appreciates the opportunity to comment to the Minerals Management Service (MMS) on the proposed rulemaking covering portions of 30 CFR Parts 250 and 251 concerning geological and geophysical operations on the Outer Continental Shelf.

BP has been actively involved in the OCS for many years. Currently, the company owns an interest in approximately 1100 Federal OCS leases. Offshore activities represent a substantial portion of BP's exploration and production effort. BP supports environmentally sound and responsible management of the nation's resources.

Please note that BP, as an active member of the American Petroleum Institute

(API), participated in the development and preparation of the API comments submitted pursuant to the subject notice and support their comments. Instead of reiterating the specific points made in the API letter, by reference BP incorporates the API comments herein.

BP, however, would like to emphasize two (2) points that we deem extremely critical. First, BP strongly urges the MMS to keep confidential, for a reasonable period of time after MMS issues the applicable permits, the G&G information (including older reprocessed data) that Lessees must submit to MMS to obtain

certain permits. We urge the MMS to consider remedies other than a premature release of reprocessed data. Second, the MMS's proposed criteria for determining limited access to this confidential data is vague and overbroad. This data is gathered at great expense to a lessee and lessees go to great lengths to ensure that strict confidentiality is preserved. MMS must ensure that G&G data and information submitted to MMS prior to such data becoming public is not disclosed to a third party, thereby giving away a competitive advantage.

If you have questions, please contact Leon Hirsch at 281-366-4238.

Sincerely,

Leon Hirsch