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Shell Offshore Inc.
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Exploration and Production
Shelf Division

September 11, 1997

received
9-17-97 VLB

Department of the Interior
Minerals Management Service
Rules Processing Team (MS 4700)
381 Elden Street
Herndon, Virginia 20170-7744

Ladies and Gentlemen:

**SUBJECT: MMS PROPOSED RULE
BLOWOUT PREVENTER TESTING REQUIREMENTS**

On behalf of Shell Offshore Inc., Shell Deepwater Development Co., Shell Deepwater Production Co., and Shell Frontier Oil and Gas Co., affiliates of Shell Oil Company (and referred to as Shell), we would like to respectfully thank the Minerals Management Service for giving us the opportunity to comment on the Proposed Rule on BOP testing requirements.

Shell is in favor of the proposed change to 14 days on testing Blowout Preventers for drilling operations. We would like the MMS to consider a similar change for Workover operations after the necessary data is gathered.

If there are further questions on Shell's comments or we came help the MMS regarding this matter, please contact Mr. Mark Davis at (504) 588-0198.

Very truly yours,

Peter K. Velez
Manager Regulatory Affairs

Bcc: J. W. Alexander OSS-2494
J. W. Campbell RTC