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VHB

James C Pruitt
Vice President
Federal Government Affairs

Corporate Communications
a Division of Texaco Inc

1050 17th Street NW
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August 15, 1997

U. S. Department of the Interior
Minerals Management Service
Mail Stop 4700
381 Elden Street
Herndon, VA 20170-1817

Attention: Rules Processing Team

Dear Sir or Madam:

Texaco Inc. appreciates the opportunity to comment on the Minerals Management Service (MMS) Proposed Rule entitled Blowout Preventer (BOP) Testing Requirements for Drilling and Completion Operations (62 FR 37819, July 15, 1997).

We have reviewed the proposed rule and support the revised testing requirements which allow 14 day intervals between BOP pressure tests.

Texaco commends the MMS for their willingness to work with industry to evaluate BOP testing requirements and to change the rules where flexibility is warranted.

Sincerely,

JCP:chm

