RULES PROCESSING TEAM
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Callon Petroleum Operating Company

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March 6, 2002

Attn: Rules Processing Team (RPT)
Department of the Interior, Minerals Management Service; MS 4024
381 Elden Street
Herndon, Virginia 20170-4817

Re: Notice of Proposed Rulemaking
Procedures for Dealing with Sustained Casing Pressure

Gentlemen:

Callon Petroleum Operating Company appreciates the opportunity to comment on the proposed rulemaking. As a small independent operator in the Gulf of Mexico, we rely often on the expertise and experience of committee members of the Offshore Operators Committee (OOC). Therefore, Callon supports the comments on the proposed rulemaking submitted by the Offshore Operators Committee (OOC). Further, we believe that the three-prong approach as outlined in the OOC comments is a more effective method for reducing risk and improving safety in a cost effective manner than a continued prescriptive regulatory approach to sustained casing pressure.

In addition to supporting the OOC comments, we would like to highlight the following areas in the proposed rulemaking that we believe will have serious impacts on our operations in the Gulf of Mexico.

30 CFR 250.520, "MMS Requirements for monitoring casing pressure".

We appreciate your careful consideration of all of the comments concerning this rulemaking.

Sincerely,

Carl D. Sayers,
Regulatory Manager
Callon Petroleum Operating Company

CDS/wm