May 28, 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; RIN 1010-AC-85
Fixed and Floating Platforms and Documents Incorporated by Reference

Gentlemen:

Newfield Exploration supports the comments, in its entirety, submitted by the Offshore Operators Committee, (OOC), on behalf of its members on the proposed subject rulemaking. Several items deserve additional emphasis. They are:

- There is confusion generated by lumping together fixed and floating requirements in the same parts. This may cause problems of interpretation. For example, although the intent is for the adoption of API RP 14J to apply only to floating facilities, the wording of 250.901 could lead someone to interpret that it also applies to fixed facilities. Splitting the requirements for each type of facility will help alleviate this confusion.
- In general, there are numerous areas where the MMS and USCG have joint responsibility, based on the proposed rulemaking. This could lead to confusion and delays in construction. The OOC comments give a concise breakdown of these problems.
- Definitions of "new" and "major modification" are vague and require more precise definitions to prevent confusion and interpretation problems.

Sincerely,

Gary Harrington
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