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Michael A. Richter  
Vice President  
Exploration and Land

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Sent via fax (703-87-1575) and mail

Ms. Kumkum Ray  
Minerals Management Service  
Department of the Interior  
381 Elden Street, MS 4700  
Herndon, VA 20170-4817

**RE: ARCO Alaska, Inc.'s Comments to the Proposed Amendments to  
30 C.F.R. Part 251**

Dear Ms. Ray:

ARCO Alaska, Inc. ("AAI") concurs with and wishes to join the Alaska Oil and Gas Association's comments to the Minerals Management Service's ("MMS") proposed amendments to 30 C.F.R. Part 251, published at 62 FR 6149 (February 11, 1997).

In addition, AAI believes the proposed revisions to Part 251 would negatively affect its competitive interests and would significantly increase its cost of complying with the regulations.

AAI further notes that any time regulatory language is changed, much uncertainty is created regarding the meaning of and effect of the new language. This is burdensome and costly for industry and the agency. AAI would urge MMS not to promulgate the new regulations, and instead continue to work with industry to address MMS's concerns.

AAI appreciates this opportunity to comment on the proposed amendments.

Sincerely,

Michael A. Richter  
Vice President  
Exploration and Land