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HALL-HOUSTON OIL COMPANY

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

Attention: Rules Processing Team

Gentlemen:

Hall-Houston Oil Company appreciates the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) on Oil Spill Financial Responsibility for Offshore Facilities (OSFR) published in the Federal Register vol. 62, No. 57, pgs. 14052-14080, Tuesday, March 25, 1997.

Hall-Houston Oil Company is an established independent operator in the Gulf of Mexico with a successful history of oil and gas exploration and production. Hall-Houston is an active participant in the Offshore Operators Committee as well as other industry trade associations. Membership in these organizations provides Hall-Houston a forum for response to pending rulemaking and gives an overall picture of the affect of proposed rules with regard to increased administrative burden and related costs to operations in the Gulf of Mexico.

Hall-Houston appreciates the Minerals Management Service interaction with industry and the industry trade groups. The American Petroleum Institute (API), Offshore Operators Committee (OOC), and Independent Producers Association of America (IPAA), have jointly developed comments to the NPRM. Hall-Houston concurs and fully endorses the comments made by API, OOC, and IPAA.

Sincerely,

HALL-HOUSTON OIL COMPANY



Gary L. Hall
Chairman