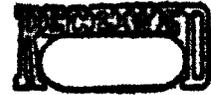


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March 31, 1999

  
RPT

Department of the Interior  
Minerals Management Service  
Mail Stop 4024  
381 Elden St.  
Herndon, VA 20170-4817

Attn: Rules Processing Team

Subject: Proposed Rule  
30 CFR Part 250

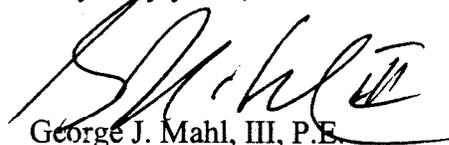
Gentlemen:

I strongly support the incorporation by referenced of the latest edition of API RP 500 and the adoption of API RP 505.

The API RP 500 document is a necessary tool utilized in the design of the electrical systems for offshore oil and gas production platforms. The earlier edition is out of print and not readily available. In addition, the new edition provides guidance for electrical area classifications on floating production facilities, which was not included in the earlier edition.

API RP 505 provides criteria for area classifications in accordance with the zone concept. Though not mandatory, this method of area classification provides an internationally acceptable method for electrical area classifications that may immediately provide a more economical means of designing and installing electrical installations on offshore platforms, provide a mechanism for more efficiently re-allocating assets from foreign operations, and in the long term, contribute to the international standardization of electrical systems.

Very truly yours,

  
George J. Mahl, III, P.E.

GJM/pc