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Shell Offshore Inc.

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April 7, 1999

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Virginia 20170-4817
Attn: Rules Processing Team



**RE: MMS NPRM - Update of Documents Incorporated by Reference
API RP 500 and 505
FR March 19, 1999; pages 13535 - 13538**

Gentlemen;

Shell Offshore Inc., Shell Deepwater Production Inc., Shell Deepwater Development Inc., Shell Deepwater Development Systems Inc., and other affiliates of Shell Oil Company (all referred to as "Shell") appreciates the opportunity to comment on the subject proposed rulemaking. Being actively involved in development projects, Shell is very interested in the adoption of industry standards and practices by MMS.

Shell supports the Minerals Management Service adoption of the Second Edition of the American Petroleum Institute's (API) Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Division 1 and Division 2 (API RP 500) and the First Edition of the American Petroleum Institute's (API) Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Zone 0, Zone 1, and Zone 2 (API RP 505).

Shell would like to point out that API has published an Errata Change to the noted publications, issued on August 17, 1998. These errata changes should also be adopted as part of the referenced standards. A copy of the errata changes are attached for your reference.

If you have any questions or need further clarification, please do not hesitate to call Rick Meyer at (504) 728-6393.

Very truly yours,

Peter Velez
Manager, Regulatory Affairs

Attachments:

1. Errata change to API RP 500 (2nd edition), issued August 17, 1998
2. Errata change to API RP 505 (1st edition), issued August 17, 1998

Copy:

Mr. Tim Sampson, American Petroleum Institute, Washington, D.C.