

Shell Offshore Inc.
An affiliate of Shell Oil Company



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February 1, 2002

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

Dear Gentlemen:

**SUBJECT: MMS REQUEST FOR COMMENTS
FR 1171 – PROPOSED RULE ALLOWING FOR A SUSPENSION OF
OPERATIONS FOR EXPLORATION UNDER SALT SHEETS
FEDERAL REGISTER NOTICE DATED JANUARY 9, 2002
VOLUME 67, NUMBER 6**

Shell Offshore Inc. would like to take this opportunity to endorse the adoption of the proposed revision/additions to 30 CFR 250.175 as discussed in the Subject Federal Register Notice of Proposed Rulemaking. We concur with the MMS's logic as outlined in the FR for the adoption of the proposed changes as well as the appropriateness of the conditions and constraints contained in the requirements sections of the proposed regulations.

MMS' proposed regulatory changes allowing an SOO for additional subsurface analysis demonstrates the MMS's recognition of the vast amount of time and resources necessary for an operator to fully evaluate a subsalt prospect. Further, we believe that MMS has built in sufficient due diligence standards to prevent operators from being able to hold leases in the Western Gulf without having first performed a significant amount of subsurface evaluation prior to making the SOO request.

Should you have any questions regarding this matter or these comments, please contact Mr. Andy Burglass at (504) 588-6012.

Yours truly,

A handwritten signature in black ink that reads "Peter Velez". The signature is written in a cursive, flowing style.

Peter K. Velez
Manager Regulatory Affairs