



**NATIONAL
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INDUSTRIES
ASSOCIATION**

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October 16, 2008

Department of the Interior
Minerals Management Service (MS 4024)
381 Elden Street
Herndon, VA 20170-4817

ATTN: Regulations and Standards Branch-Technical Changes to L & O

RE: RIN 1010-AD 50; Technical Changes to Production Measurement and Training Requirements (FR Vol. 73, No. 181, September 17, 2008)

Dear Sir or Madam:

The National Ocean Industries Association (NOIA) appreciates the opportunity to respond to your request for comments on the proposed rule for changes to Sub Part L and Sub Part O as published in the September 17, 2008 Federal Register. NOIA is the only national trade association that represents all companies engaged in the exploration for, and production of, traditional and alternative energy on the nation's Outer Continental Shelf. The NOIA membership comprises more than 300 companies engaged in activities ranging from producing to drilling, engineering to marine and air transport, offshore construction to equipment manufacture and supply, shipyards to communications, and geophysical surveying to diving operations. The proposed rule is, therefore, of particular importance to us.

NOIA is committed to securing reliable access to the nation's valuable offshore energy resources in order that they may be developed, produced and supplied in an environmentally responsible manner. We are therefore writing in support of the substantive comments provided by the Offshore Operators Committee as submitted to the agency via their written letter of October 13, 2008.

Thank you for considering our comments on the proposed rule. If you have any questions or need additional information, please feel free to contact me at 202-347-6900.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Vorberger", is written over a light blue horizontal line.

Jeff Vorberger
Director
Government Relations