

September 10, 2009

Department of the Interior
Minerals Management Service (MS 4024)
Attn: Rules Processing Team (Comments)
381 Elden St.
Herndon, VA. 20170-4817

Re: RIN 1010-AD 15; SEMS
FR Vol. 74, No. 115 6-17-09

Dear Sirs:

This letter is to provide written comments on the proposed rule to amend regulations associated with Outer Continental Shelf oil and gas as published in the June 17, 2009 Federal Register. I understand that MMS wrote the proposed rule with the expectation that the rule would address concerns that the agency has in OCS safety, however, in my prescriptive this rule will not specifically address the causes and will completely fail to achieve the benefits that the agency believes will occur.

I have read the comments that have been filed on behalf of industry by the Offshore Operators Committee (OOC) and the American Petroleum Institute (API). I feel they are attempting to be tactful and gracious in their comments. My comments will be much more direct. As someone who has had family members working offshore for years I am concerned about safety. I do not understand how MMS expanding its reach into other agencies jurisdiction is going to help safety. MMS wanting to handle enforcement issues on MODUs where the USCG has jurisdiction and has done a very good job over the years with their limited resources is nothing more than a duplication of efforts and a power grab by MMS. Requiring mandatory reporting to MMS when OSHA is the appropriate agency is another area of duplication and another power grab by MMS. I may be misreading the information but it also appears that MMS is attempting to take over jurisdiction of DOT regulated lines. If this is the case, here is another attempt at duplication or a power grab by MMS. The paperwork to comply with this rule is tremendous and with no direct correlation to improved safety. Have you read the Paperwork Reduction Act? I understand MMS wants to protect the environment offshore but what about saving a few trees after all you are a part of the Department of Interior. What this appears to be is an attempt to secure more jobs for MMS not improve safety. If this is implemented and safety doesn't improve MMS will not admit it was wrong but simply put more restrictive measures in place. If you don't believe me look at your history.

If MMS wants to improve safety offshore maybe they should look at themselves not the industry. MMS cannot keep up with the workload it has why does it want to take on more work with no indication it will make improvements for my family's safety working offshore. The real result of this rule is to make complying so expensive for small companies that they can no longer work in the Gulf. This is MMS driving out the small competitors.

I want to see improvements to safety, reliability, and environment. These are important to me personally. Why such a broad ranging rule when NTLs and Safety Alerts have served this industry well for so many years. I realize my comments may not be taken seriously since I am only a citizen now and I do not work in the industry. I do not have a problem with the government since my son is a police officer I realize the need for government in our lives. I do have difficulty seeing how this rule with its one size fits all directives will help improve safety. I have never written a comment on a rule before so this may not be the correct format but this rule angered me to the point I had to write. I am also sending this to my congressman and both my state senators as I find this rule ridiculous. This industry which has provided for my family for years has an excellent safety record therefore it appears that MMS has misguided efforts and their attention would be better use in another area.

Sincerely
Rene Williams
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Lewisville TX 75067

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