



Jame R. Grant
Regulatory and Advocacy Manager
Gulf of Mexico SPU

September 22, 2009

U.S. Department of the Interior
Minerals Management Service
381 Elden Street
Herndon, VA 20170-4817

Attn: Rules Processing Team (Comments)
MS 4024

Re: Annular Casing Pressure Management
for Offshore Wells, RIN 1010-AD 47; FR
Vo. 74, No. 146 07/31/09

Dear Sir or Madam:

BP America appreciates the opportunity to comment on the the June 17, 2009 Federal Register Notice where the MMS has proposed to incorporate API RP 90 by reference into the MMS regulations.

BP worked with API and MMS to develop an industry recommended practice for managing annular casing pressure, published in 2006 as API RP 90. We support the MMS action to incorporate API RP 90 into the regulations. We are appreciative of the collaborative process used by the MMS and industry to develop this clear and succinct RP and proposed rule.

Again, we appreciate the opportunity to provide comments on this important issue. Should you have additional questions regarding these comments, please contact James Grant, Regulatory and Advocacy Manager at 281-366-6490 or Scherie Douglas, Sr. Regulatory and Advocacy Advisor at 281-366-6843.

Sincerely,

A handwritten signature in black ink that reads 'James R. Grant'.

James R. Grant
Regulatory and Advocacy Manager