

Dear Reader:

I will open with high-level comments. It is my opinion that the BOEMRE and DOI have overstepped their bounds by invoking emergency rulemaking due to the Macondo Blowout. That applies not only to the new rules that are the topic of this comment but also the numerous NTLs on the topic. Making rules effective immediately and not allowing the affected parties the opportunity to review and comment on those rules presents the very real possibility of damaging the interests of both the public as the industry attempts to strengthen the nation's domestic reserve base.

I have reviewed the interim final rules and contributed to the joint industry group which has submitted those comments under separate cover. I am expressing my full support for the comments made by the American Petroleum Institute, International Association of Drilling Contractors, Independent Petroleum Association of America, National Ocean Industries Association, Offshore Operators Committee and U.S. Oil and Gas Association.

Thank you for your attention to this comment. Do not hesitate to contact me if you have any questions.

Regards,

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