

December 13, 2010

Department of the Interior
Bureau of Ocean Energy Management, Regulation and Enforcement
Attention: Regulations and Standards Branch (RSB)
381 Elden Street, MS-4024
Herndon, Virginia 20170-4817

Reference: Increased Safety Measures for Energy Development on the Outer Continental Shelf, 1010-AD68

Ladies and Gentlemen:

Exxon Mobil Corporation appreciates the opportunity to submit comments regarding the Increased Safety Measures for Energy Development on the Outer Continental Shelf (OCS) as requested in Federal Register dated October 14, 2010.

As a result of the tragic events in the Gulf of Mexico last summer, we are reminded of the need to be ever vigilant in the area of safety and environmental protection. We commend the Department's efforts to improve the safety of operations on the OCS with the interim final rule. In support of this effort, ExxonMobil would like to offer comments in three specific areas which we believe would improve the effectiveness and facilitate implementation of the final rule.

§250.198(a)(3) "Should" and "Shall" mean "Must" in documents incorporated by reference

API Recommended Practice 65-2, Second Edition should be incorporated into the Final Drilling Safety Rule in place of the First Edition that is currently incorporated in its entirety by reference. The Second Edition will incorporate learnings from the Macondo well incident, enhance the description and classification of well control barriers, and define testing requirements for cement to be considered a barrier.

The BOEMRE should resolve the issue of how Recommended Practices written as industry guidelines can be used simultaneously as legal requirements, and work with industry to resolve this fundamental conflict, as well as the multiple conflicting rules created by mandating all "shoulds" are now "musts".

If a "should" is not used because it has been evaluated and a safer, more appropriate, alternative has been identified, the approved "Application for Permit to Drill a New Well (APD) will serve as an exemption.

§250.420(b)(3) Installation of dual mechanical barriers in addition to cement for final casing string

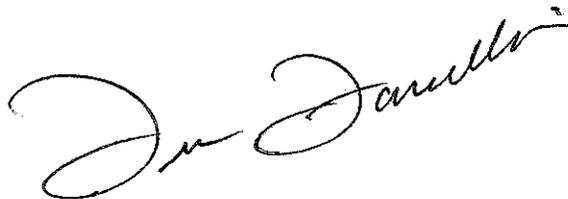
ExxonMobil supports the concept of dual barriers as specified in the Drilling Safety Rule. However, Industry best practices do not consider dual float valves to be two separate mechanical barriers because they cannot be tested independently and because they are not designed to be gas tight barriers. This regulation does not achieve the safety objectives of the Drilling Safety Rule.

§250.451(i) Retrieval and inspection of shear rams following use in a subsea well control event

ExxonMobil supports testing the Blowout Preventer (BOP) stack following use in a well control event to demonstrate equipment integrity. However, a successful seafloor pressure and function test of the BOP following a well control event also is an acceptable means of verifying integrity. Ram sealing elements would be compromised before damage to the rams themselves would be extensive enough to prevent successful shearing of pipe. Additionally, plugging an open hole that may be experiencing ballooning and gas following a well control event and pulling the BOP and riser present safety and operational risks that are likely much greater than proceeding with the drilling program using a fully tested BOP stack.

ExxonMobil appreciates the opportunity to provide these comments. Please do not hesitate to contact me at (202) 862-0235 if you have any questions or would like any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Danville". The signature is written in a cursive, flowing style and is positioned below the "Sincerely," text.