

**From:** Ross Frazer [mailto:RFrazer@atpog.com]

**Sent:** Monday, January 24, 2011 9:42 PM

**To:** White, Amy

**Cc:** Bill Daugherty; George Morris; John Tschirhart

**Subject:** RIN1010-AD68 Comment on Increased Safety Measure for Energy Development on the Outer Continental Shelf: Availability, Initial Regulatory Flexibility Analysis

**Importance:** High

Dear Ms. White,

I'm Vice President, Engineering for ATP Oil & Gas Corporation (Operator No. 1819). We work primarily in the deep-water of the Gulf of Mexico ("GoM") although we have significant holdings on the GoM OCS Shelf.

Specific to the costs which the BOEMRE has published regarding the captioned I have to advise you that the BOEMRE has missed the estimate by a significant amount. Our estimates based on actual project-specific experiences indicate that the additional costs to comply with the interim final rule will add three to five times the amount the BOEMRE has published. When analyzed through the lens that is our business model that means that several millions of barrels of domestic oil per year will not be developed and likely lost.

Thank you for your attention to this submittal. Please do not hesitate to contact me if you have any questions.

Regards,

*Ross*

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