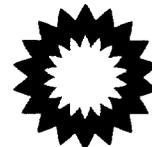


MAR 10 2002



bp
Leon Hirsch

Manager, Land and Negotiations
Gulf of Mexico

Amoco Production Company
BP Exploration & Oil Inc
Vastar Resources Inc.
Vastar Offshore.
15375 Memorial Drive, 3432
Houston, TX 77079

March 8, 2002

Attn: Rules Processing Team (RPT)
Department of the Interior, Minerals
Management Service; MS 4024
381 Elden Street
Herndon, Virginia 20170-4817

Via Certified Mail

RE: Notice of Proposed Rulemaking
Procedures for Dealing with
Sustained Casing Pressure

281-366-4238
Fax: 281-366-7613
hirschl@bp.com
www.bp.com

Gentlemen:

BP and its affiliated companies appreciates the opportunity to comment on the proposed rule to amend regulations in Subpart E regarding sustained casing pressure (SCP) in oil and gas wells on the outer continental shelf (OCS), as provided in the November 9, 2001 Federal Register Notice. BP has been actively involved in the OCS for many years. Currently, the company owns an interest in approximately 1,000 Federal OCS leases. Offshore activities represent a substantial portion of BP's exploration and production effort. BP supports safe and environmentally sound management of the nation's resources.

As an active member of the Offshore Operators Committee (OOC), BP participated in the development of the comments submitted by OOC on this proposed rulemaking. We support the comments submitted by the OOC, and further, we believe that the three-prong approach as outlined in the OOC comments is a more effective method for reducing risk and improving safety in a cost effective manner than a continued prescriptive regulatory approach to sustained casing pressure. Instead of reiterating the points made in the OOC letter, by reference BP incorporates those positions herein.

Sincerely,

A handwritten signature in black ink, appearing to read "Leon Hirsch", is written over the typed name.
Leon Hirsch