



KERR-McGEE OIL & GAS CORPORATION

16666 Northchase · Houston, Texas 77060

Cary V. Bradford
Manager of Regulatory Affairs
GOM and North America Region

RULES PROCESSING TEAM

Phone: 281/618-6338
Fax: 281/618-6046

MAR 1 8 2002

March 11, 2002

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

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

Gentlemen:

Kerr-McGee oil & Gas Corporation appreciates the opportunity to comment on the proposed rulemaking. We support the comments on the proposed rulemaking submitted by the Offshore Operators Committee (OOC). 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.

We appreciate your careful consideration of all of the comments concerning this rulemaking.

Sincerely,


Cary V. Bradford