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October 2, 2000

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Virginia 20170-4817**RE: Proposed Rule
Oil and Gas and Sulphur Operations in the Outer Continental Shelf -
Decommissioning Activities - Additional Comments**

Please find attached additional comments submitted by Trunkline Gas Company in response to the Mineral Management Service's request for comments regarding the above referenced proposed rule.

If you have any questions or require any additional information, please contact me at 713-989-7473 or Eric Amundsen at 713-989-7460.

Sincerely,

Jerry Rau
Manager, Pipeline IntegrityCC:
Eric Amundsen – Director of Technical Services
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Introduction

Trunkline Gas Company operates an extensive interstate natural gas transmission system. This pipeline system receives natural gas from the major production areas of the Gulf Coast for transportation and sale in the Upper Midwest of the United States. The operation of this pipeline system is subject to the requirements of Title 49 CFR Parts 190, 191, 192, 193, and 199 and certain parts of Title 30 CFR Part 250.

Trunkline Gas Company supports the efforts of the Mineral Management Service to streamline regulations and to make them more understandable by writing them in plain language. We feel that this enhances the Regulations by making them clear and concise to the User. Our main concern is the timeframes associated with decommissioning and abandoning expensive assets. We feel that the Operator should have more Control over the final disposition of these assets. We also are concerned about the issue of Jurisdiction that is now being threatened by a Regulation that seems to cross the boundary established by the DOT and DOI in their MOU.

New Regulation Conflict with existing DOI and DOT (MOU)

Trunkline Gas Company feels that the wording in the new Regulation seems to infer that all OCS pipelines are to conform to the Decommissioning Rules, contradicting the DOI and DOT Memorandum of Understanding (MOU). The MOU places to the greatest extent practical, producer-operated pipelines under DOI regulation and transporter-operated pipelines under the jurisdiction of the DOT. Trunkline Gas Company is subject to DOT 49CFR192 on all matters except the granting and relinquishment of permits for pipeline Right-of-Way, which is covered under 30CFR250. Since DOT 49CFR192.727 already address the Abandonment and inactivation of facilities including offshore facilities, we see this as a conflict.

Trunkline Gas Company, as a DOT regulated Operator in the OCS, understands the responsibility of the MMS to monitor the safety of personnel and the environment in the OCS and as a prudent Operator, we inform the MMS of our Activities. These notifications provide the information required to allow the MMS to review our work plans enhancing overall Project safety and allow them to provide the benefit of their knowledge and experience. We still firmly believe that design; construction, operation and maintenance activities, including abandonment and deactivation should remain under DOT authority and subject only to DOT regulations. Any other course of action promotes confusion and uncertainty, as Operators try and decide which rules apply to them and defeats the noble intention of the MOU.