

May 28, 2002

Department of the Interior
Minerals Management Service
MS-4024
381 Elden Street
Herndon, Virginia 20170-4817
Attention: Rules Processing Team

RE: Notice of Proposed Rule Making; RIN 1010-AC-85
Fixed and Floating Platforms

Dear Sir or Madam:

The Independent Petroleum Association of America (IPAA) would like to express its endorsement of the comments submitted by the Offshore Operators Committee (OOC) on the subject proposed rule to amend regulations for offshore fixed and floating platforms. IPAA supports them wholeheartedly.

The IPAA is a national trade association representing approximately 5,000 independent oil and natural gas producers and service companies who are active in both the domestic and international arenas. In the Gulf of Mexico (GOM) portion of the OCS, independent producers own nearly 60 percent of the total acreage, including approximately 80 percent of the Shelf area and almost 50 percent in the deep-water portion. Independents produced a majority of the oil and natural gas in the Shelf portion of the GOM and participated in nearly half the wells drilled in the OCS in the calendar year 2001.

Thank you for the opportunity to offer our views on this important rule change.

Sincerely,



Ben Dillon
Vice President, Political Affairs and Public Resources
Independent Petroleum Association of America