



NIPPON OIL EXPLORATION U.S.A. LIMITED
5847 San Felipe, Suite 2800, Houston, Texas 77057
Main (713) 260-7400 • Telecopy (713) 978-7800

received

8-21-97

VWB



13

August 20, 1997

Department of the Interior
Minerals Management Service
381 Elden Street, Mail Stop 4700
Herndon, VA 20170-4817

VIA COURIER

Attn: Rules Processing Team

RE: Oil Spill Financial Responsibility for Offshore Facilities

Gentlemen:

Nippon Oil Exploration U.S.A. Limited, as active Operator and lease holder in the Gulf of Mexico, appreciates the opportunity to comment of the subject proposed regulation.

This is a very complex issue when you consider the number of wells, platforms, facilities, and pipelines in the Gulf of Mexico which are operated by hundreds of small, mid-size, and large entities, many of which have multiple owners. To write a single regulation which must be applicable to so many different scenarios would seem an impossible task. We commend the MMS in its efforts to do so.

Nippon Oil Exploration has been furnished with a copy of the extensive comments prepared jointly by API, IPAA, and OOC and concurs in the recommendations offered in those comments.

We appreciate the MMS's continuing efforts to work with Industry in resolving this issue.

Yours very truly,

L. Charles Scholz
Vice President

JAN:wmb/115