

July 17, 1998

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Virginia 20170-4817
Attention: Rules Processing Team (Comments)

The Independent Petroleum Association of America (IPAA) appreciates the opportunity to comment on the Minerals Management Service (MMS) proposed rule on Postlease Operations Safety.

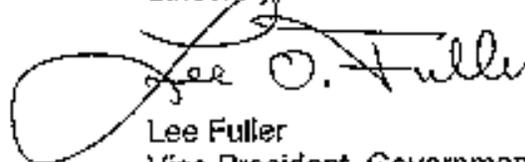
IPAA is the national trade association representing domestic independent crude oil and natural gas explorers/producers. Independent producers are actively pursuing America's vast offshore oil and gas resource base. Currently independents represent the vast majority of operators in the OCS, drill approximately 59 percent of the wells and own roughly one-third of primary term acreage in the Gulf of Mexico.

Independent producers are pleased that MMS has initiated an effort to update and clarify regulations concerning postlease operations. We commend the agency for conducting the March 24, 1998, public meeting to provide an opportunity for discussion of the MMS criteria for the disqualification of operators.

For the past few years IPAA's Offshore Committee has worked closely with sister organizations regarding the subject of safety and environmental management. Accordingly, we offer our full endorsement of the July 1, 1998, comments submitted to the MMS by the American Petroleum Institute and the Offshore Operators Committee.

We appreciate the opportunity to comment and urge you to contact IPAA staff members Ben Dillon or Craig Ward for further assistance on this or other matters. They can be contacted at 202-857-4722.

Sincerely,



Lee O. Fuller

Lee Fuller
Vice President, Government Relations