



November 17, 2008

**NATIONAL
OCEAN
INDUSTRIES
ASSOCIATION**

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Department of the Interior
Minerals Management Service (MS 4024)
Attn: Regulations and Standards Branch-Technical Changes to L & O
381 Elden Street
Herndon, VA 20170-4817

Re: RIN 1010-AD 50; Technical Changes to Production Measurement and Training
Requirements
FR Vol. 73, No. 181 9-17-2008

As representatives of the nation's offshore energy industry, the National Ocean Industries Association (NOIA) appreciates the opportunity to respond to your request for comments on the proposed rule.

NOIA represents hundreds of companies engaged in the exploration for, and production of, traditional and alternative energy on the nation's Outer Continental Shelf (OCS). Our members are drawn from all facets of the oil and natural gas industry, from drilling to producing, engineering to marine and air transport, offshore construction to equipment installation, manufacture and supply, and geophysical surveying to diving and remotely operated vehicles. Increasingly our membership includes companies that are developing systems for tapping unconventional energy resources in the ocean, including wind, wave and tidal power. Either directly or indirectly, NOIA's member companies are all working to explore and produce OCS energy resources in an environmentally sensitive manner. The proposed rule, therefore, is of particular importance to us.

NOIA appreciates that the proposed rule will eliminate requirements for having to obtain certain waivers associated with production measurement regulations in Subpart L following force majeure events. NOIA concurs with the opinions sent in by the Offshore Operators Committee and suggests that MMS consider similar revisions associated with the production safety system testing requirements in Subpart H (30 CFR 250.804). This would further reduce the number of waiver requests immediately following force majeure events.

Thank you for the opportunity to provide input on this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Kearns", is written over a horizontal line.

Michael Kearns
Director, External Affairs