RULES PROCESSING TEAM

JUL - 7 2006

Scherie Douglas
GoM Exploration
501 WestLake Park Boulevard
Houston, Texas 77079

Telephone: (281) 366-6843
Fax: (281) 366-3599
Scherie.Douglas@bp.com

July 6, 2006

U.S. Department of the Interior
Minerals Management Service
381 Elden Street, MS-4024
Herndon, VA 20170-4817

Attn: Rules Processing Team (RPT)

Re: Incorporate API RP 65 for Cementing Shallow Water Flow Zones, RIN 1010-AD19

Ladies and Gentlemen:

We offer the following comments to assist the MMS in determining the best method to use API RP 65, Recommended Practice for Cementing Shallow Water Flow Zones in Deep Water, first Edition in its regulatory program:

1. We concur with the proposal to upgrade requirements for cementing in 30 CFR Part 250 Subpart A-General, and Subpart D-Oil and Gas Drilling operations to include reference on when API RP 65 is to be evaluated. We believe it is appropriate to include a statement in the Application for the Permit to Drill indicating that RP 65 was consulted and evaluated for surface and conductor casing strings. The proposed conditions for when RP 65 should be consulted should lead operators to make optimum choices for best dealing with shallow water flow (SWF) issues.

2. API RP 65 is a recommended practice and we do not believe a specific cementing technique or 'best practice" can be singled out on how to best handle shallow water flow issues in lieu of incorporating the entire standard. We believe RP 65 has enough flexibility to insure an operator will choose the optimum SWF prevention solution for a specific well. RP 65 was developed by the industry in the 2000 to 2002 timeframe to help operators make the best choices in areas with potential for SWF occurrences. Industry awareness of RP-65 which does not specify a specific "best practice" assures procedures developed and recommended in RP 65 along with more recent and potential

future advances in cementing and operational techniques are used to mitigate SWF occurrences.

3. Enhancing and maintaining safety in operations is a primary goal of BP. We assess that current MMS regulations for cementing applications in well abandonment and in general cementing requirements currently provide a very high level of safety. Should special problem areas develop in the future we believe they will be identified by the MMS and the industry very quickly and would expect them to be resolved at that time.

We appreciate the opportunity to comment on these MMS proposals. Should you have questions or require further information, please contact the undersigned at (281) 366-6843.

Sincerely,

Scherie D. Douglas

Scherie Douglas
Sr. Regulatory Specialist