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Submitter Information

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General Comment

Re: Notice of a renewal of an information collection (1010-0149).

Dear Ms. Blundon,

The Marine Mammal Commission strongly supports the collection of information regarding platforms and other structures used in oil and gas operations. The design, construction, use, maintenance, and removal of such structures are critical factors in determining the safety of oil and gas operations and in protecting the environment in which those operations occur. A review of past oil spills highlights the need for careful regulation of platforms and related structures, particularly in the marine environment where those structures are subject to occasionally severe oceanographic and climatic condition. The loss of platforms and pipeline segments due to hurricanes Katrina and Rita provide ample evidence that such structures can fail and that careful regulation is required to avoid such outcomes. The Bureau of Ocean Energy, Management, Regulation, and Enforcement cannot be expected to regulate these platforms and related structures without the ability to collect relevant information. Given the potentially severe consequences of an accident, the costs and effort associated with collection of such information seems a relatively minor burden on the oil and gas industry. For that reason, the Marine Mammal Commission strongly encourages the collection of such information.

Please contact me if you have questions regarding the Commission's views on this matter.

Sincerely,

Timothy J. Ragen

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