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April 22, 1998

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Va. 20170-4817

Attn: Rules Processing Team

Ref: Proposed Rule on Postlease Operations Safety (63FR7335-February 13, 1998)

The Offshore Operators Committee (OOC) in agreement with American Petroleum Institute (API) and Independent Petroleum Association of America (IPAA) request a 90 day extension to the May 14, 1998 comment deadline for the proposed rule on Postlease Operations Safety (63FR7335-February 13, 1998).

This proposed rule has a number of important changes that require careful consideration for comments. OOC, API and IPAA are actively preparing our comments now but we have found it difficult to compare the existing 30CFR 250 Subpart A rule since it is written in "Plain English" and sections, paragraphs, and sentences do not have the same order and numbering sequence. This reordering of Subpart A requires additional time to sort out for comparison.

Thank you for considering our time extension request.

Sincerely,

Virgil Harris
Executive Director

cc: Tim Sampson, API
Craig Ward, IPAA

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