

**Shell Offshore Inc.**  
An affiliate of Shell Oil Company



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Exploration and Production  
Shelf Division

**VIA AIRBORNE EXPRESS**

April 22, 1999

Minerals Management Service  
Attn. Royalty Management Program, Rules and Publications Staff  
Building 85, Room A613  
Denver Federal Center  
Denver, Colorado 80225

**SUBJECT: MMS NOTICE OF INFORMATION COLLECTION SOLICITATION  
SUBMITTAL OF COMMENTS  
FORMS MMS-3160, MMS-4054, MMS-4055, MMS-4056, MMS-4058  
64 FR 8844**

Dear Sir or Madam:

On behalf of Shell Exploration & Production Company and its exploration and production subsidiaries and affiliates, Shell Offshore Inc., Shell Deepwater Production Inc., Shell Deepwater Development Inc., and others (all referred to as Shell), we are pleased to respond to the Minerals Management Service's request for comments on the proposed changes to the above-subject MMS Forms.

The comments are written following the format of the Federal Register notice on the proposed changes.

**MONTHLY REPORT OF OPERATIONS, FORM MMS -3160**

NO COMMENT.

**OIL AND GAS OPERATIONS (OGOR), FORM MMS-4054**

EXPANDED OPTION FOR MODIFICATION METHOD - The MMS proposes to give companies the option to overlay the form to be modified in its entirety in addition to the current Delete/Add method. We prefer the current Delete/Add method for purposes of control, so as long as it is retained, we have no problem with including the additional option.

REVISED WELL STATUS CODE - The MMS proposes reduction of the well status code on the OGOR-A from 13 digits to 4 digits. We strongly support this change which should save time and reduce the possibility of errors.

BD910603.DOC

COMBINING OGOR B AND C - We support the combining of the OGOR B and C reports.

**GAS ANALYSIS REPORT (GAR), FORM 4055**

NO COMMENT.

**GAS PLANT OPERATIONS REPORT (GPOR), FORM MMS - 4056**

NO COMMENT.

**PRODUCTION ALLOCATION SCHEDULE REPORT (PASR), FORM MMS - 4058**

We can support the changes made to the PASR, but are concerned that adding additional lines to the form will make manual preparation, when necessary, difficult to read/write.

We appreciate the opportunity to submit these comments. If you have any questions, please contact Pat Lallinger (504) 728-7275 or me at (504) 728-6982.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Velez". The signature is written in a cursive, flowing style.

Peter K. Velez  
Manager Regulatory Affairs