



INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

P.O. Box 4287 • Houston, Texas 77210-4287 USA
10370 Richmond Ave., Suite 760 • Houston, Texas 77042 USA
Phone: 1/713-292-1945 • Fax: 1/713 292-1946 • www.iadc.org

18 June 2008

Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503
ATTN: Desk Officer, U.S. Coast Guard

Re: Docket No.USCG-2005-21780 Financial Responsibility for Water Pollution (Vessels)
and OPA 90 Limits of Liability (Vessels and Deepwater Ports)

To whom it may concern:

The International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States, as well as all MODUs registered in the United States.

We offer for consideration the following comments and concerns in response to the 5 February 2008 (73 FR 6642) *Federal Register* notice of proposed rulemaking regarding changes to 33 CFR 138.

MODUs are treated as a tank vessel during certain operational times, as defined in 33 CFR 138.15, and therefore must meet the stated financial responsibility of a single or double hull tank vessel. However, because of their unique design, the nature of their operations and their reduced amount of historical spills, we believe that MODUs should be allowed to follow the lower level of financial responsibility for double hulls. To fully address this issue, we believe that the matter needs to be resolved by a supplemental rulemaking to specifically address that point.

If you have any questions regarding these comments or recommendations, please contact me by phone at: (713) 292-1945, ext. 203.

Sincerely

John Pertgen
Assistant Director, Offshore Technical
and Regulatory Affairs