



## INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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7 JULY 2006

RADM Craig Bone  
U.S. Coast Guard (G-P)  
2100 2<sup>nd</sup> Street SW  
Washington, DC 20593-0001

Re: MARPOL Annex VI - Bunker Delivery Note Requirement

Dear RADM Bone:

As you are aware, 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 the 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.

With regard to the ongoing issue involving the non-delivery of bunker delivery notes required by MARPOL Annex VI, the International Maritime Organization (IMO) has published MEPC Circular 508, which is trying to raise the awareness of the necessity to implement and enforce this requirement. However, this has not solved the issue for many vessels in the Gulf of Mexico, which rely on US based fuel suppliers, who are not aware, or are not participating in this effort. This is problematic as many flag States are requiring this documentation to be produced as a condition for survey under Annex VI. Obviously, a deficiency in this matter is not correctable.

As the "Administration" for MODUs irrespective of flag, operating on the U.S. Outer Continental Shelf, we request that your office provide a statement indicating that MODUs do not have to obtain bunker delivery notes irrespective of their flag while operating under U.S. jurisdiction in the Gulf of Mexico.

If you have any questions regarding this correspondence, please contact me by phone at: (713) 292-1945, ext 203.

Sincerely,

John Pertgen  
Assistant Director, Offshore Technical  
And Regulatory Affairs