



December 18, 1998

VIA FACSIMILE

(303) 275-7124

Mr. Todd McCutcheon
Minerals Management Service
Policy & Management Improvement
P. O. Box 25165
Denver, CO 80225-0165

Chevron U.S.A. Production Company
1301 McKinney Street
Houston, Texas 77010-3029
Mail Address: P. O. Box 3725
Houston, Texas 77253-3725

George W. Butler III
Senior Counsel
Law Department
(713) 754-7809
Fax (713) 754-3366

Deepwater Transportation

Dear Sir:

Chevron U.S.A Production Company, a Division of Chevron U.S.A. Inc., appreciates the opportunity to comment on transportation and gathering issues recently discussed at an MMS workshop in New Orleans.

Chevron actively participated in the formation of the proposal presented by Shell, Texaco and Marathon representatives at the recent workshop, as well as the comments submitted by the American Petroleum Institute, which Chevron endorses and incorporates by reference herein.

We stand ready to participate in future workshops and in the rulemaking process. We encourage MMS to address this very important issue as soon as practicable.

Respectfully submitted,

A handwritten signature in cursive script that reads "G. W. Butler".

George W. Butler

cc: R. J. Sandilos HOU130/2478