



MARINE MAMMAL COMMISSION

19 July 2011

Ms. Cheryl Blundon
Regulations and Standards Branch
Bureau of Ocean Energy Management, Regulation, and Enforcement
381 Elden Street, MS-4024
Herndon, VA 20170-4817

RE: Information Collection Request ICR 1010-0057

Dear Ms. Blundon:

The Marine Mammal Commission has reviewed the Bureau of Ocean Energy Management, Regulation, and Enforcement's *Federal Register* notice regarding information collection requirements related to Pollution Prevention and Control (76 Fed. Reg. 38410). The Outer Continental Shelf Lands Act authorizes the Department of the Interior, and by extension the Bureau, to prescribe regulations governing oil and gas operations on the Outer Continental Shelf to meet the nation's energy needs as rapidly as possible; to balance orderly energy resource development with the protection of human, marine, and coastal environments; to ensure the public a fair and equitable return on Outer Continental Shelf resources; and to preserve and maintain free enterprise competition.

Regulations pertaining to pollution prevention and control are important means of avoiding and minimizing potential damage from blowouts, loss of well control, fires, spills, and physical obstructions to other users of the of the waters or subsoil or seabed. To implement these regulations, the Bureau requires the operator to maintain and make available such records as required to verify compliance with all applicable regulations at 30 CFR Part 250 (Subpart C) and any other requirements contained within Notices to Lessees that restrict or prevent the discharge of hazardous materials into the marine environment. This includes adequate marking with the owner's identification of materials, equipment, tools, containers, and all other items used on the Outer Continental Shelf. The Commission supports the Bureau's request that the Office of Management and Budget approve the collection of information related to pollution prevention and control. The Commission considers such information an important part of efforts to protect the marine environment.

Thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen".

Timothy, J. Ragen, Ph.D.
Executive Director