

08 September 2009

Docket ID MMS-2008-OMM-0003

Department of the Interior
Minerals Management Service
ATTN: Regulations and Standards Branch (RSB)
381 Elden Street, MS-4024
Herndon, Virginia 20170-4817

Re: Safety and Environmental Management Systems for Outer Continental Shelf Oil and Gas Operation, 1010-AD15

To whom it may concern:

Nabors Offshore Corp. has reviewed the MMS proposed SEMS regulation. While we are in philosophical agreement with MMS concerning the need and obligation to conduct operations on the OCS in as safe and efficient a manner as possible, we have reservations about the proposed rule. Our expectation of the effect of the proposed rule is that it will create a layer of paperwork on top of what is already being done. All Lessees have safety management systems at this point as do all drilling and workover contractors. None are going to see changing their programs to abide by a prescriptive regulation as movement forward.

We also wish to advise MMS that through our regular participation in our industry trade association, the International Association of Drilling Contractors, we are aware of and support their comments which will be sent to MMS under separate cover and before the deadline.

Sincerely,



Richard Grayson
Manager, HSE & Training