



**Lloyd's Register North America, Inc.**

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Jann Atkinson, Project Manager,  
Draft Drilling and Production Regulations,  
National Energy Board  
444 Seventh Avenue S.W.  
Calgary, Alberta  
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Date 10 August 2007

Your ref

Our ref HFX/ O-15168

Dear Jann,

**Stakeholder Comment Period, all Draft Drilling and Production Regulations**

Lloyd's Register North America appreciates the invitation to comment on the proposed draft regulations and supports the effort to move to goal based approach.

Some general comments regarding the process for the consideration of the Project Working Group are detailed below:

1. Prior to introduction the relevant sections of the remaining prescriptive regulations that reference parts of the existing drilling and production & conservation regulations, including appendices, will require amendment. This should include identification of the proposed new regulations that will remain the remit of the Certifying Authorities.
2. It is unclear presently whether it is the intention for Certifying Authorities, as defined in the Certificate of Fitness Regulations, will be retained, renamed or replaced.
3. The situation regarding the continuing validity of existing approved Regulatory Query Forms (RQF's) for individual Operators needs to be stated.
4. The approval process for RQF's and Board decisions made by Transport Canada under the Canada Shipping Act for Floating Offshore Installations is present understood. How this relationship will operate under the new regime should be clarified.

If you have any questions or concerns please contact the undersigned.

Yours sincerely,

Mark Horswill  
Class & Compliance Manager  
Canada