



Office of the
Maritime Administrator

REPUBLIC OF THE MARSHALL ISLANDS MARITIME ADMINISTRATOR

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August 25, 2010

Captain Hung Nguyen
Co-Chair Joint Marine Board of Investigation
United States Coast Guard
Chief, Prevention Division, District Fourteen
1201 Elmwood Park Blvd.
New Orleans, Louisiana 70123-2394

Mr. David Dykes
Co-Chair Joint Marine Board of Investigation
Chief of the Office of Safety Management for Field Operations
Bureau of Ocean Energy Management, Regulation, and Enforcement
Gulf of Mexico Outer Continental Shelf (OCS) Region
U.S. Department of the Interior
1201 Elmwood Park Blvd.
New Orleans, Louisiana 70123-2394

Re: DEEPWATER HORIZON Casualty Investigation

Dear Captain Nguyen and Mr. Dykes:

I write on behalf of the Maritime Administrator of the Republic of the Marshall Islands (the "Maritime Administrator"), flag administration for the Mobile Offshore Drilling Unit (MODU) DEEPWATER HORIZON, IMO No. 8764597, to respond to your letter dated August 4, 2010 requesting information regarding the Classification of the Deepwater Horizon as a MODU instead of a Dynamically Positioned Vessel (DPV).

The American Bureau of Shipping (ABS) Classified and certified the DEEPWATER HORIZON as a *A1, Column Stabilized Drilling Unit, *AMS, *ACCU, *DPS-3 (the highest rating for dynamically positioned vessels), Self-propelled MODU which was designed, built delivered and confirmed as such in a written affidavit issued to the Administration in preparation for registration in the Marshall Islands. The Minimum Safe Manning Certificate (MSMC) application submitted by Transocean to the Administration also identified it as such.

During the course of registration in December 2004, and, as a result of a clerical error, the Maritime Administrator used the wrong MSMC template resulting in the issuance of an MSMC for a Self-Propelled MODU instead of a DPV Unit. Nevertheless, for the entire period of time under the Marshall Islands flag, Transocean has manned the rig to the correct Marshall Islands requirements for a DPV Unit.

TREX-50394

The manning requirements and subsequent manning levels increased when the Deepwater Horizon was registered in the Marshall Islands in December 2004. Specifically, the manning requirements and subsequent manning levels increased when Transocean re-registered the Deepwater Horizon to Marshall Islands as follows:

| ON STATION | |
|--------------------------|--------------------------------------|
| Panama | Marshall Islands |
| 1 Master or OIM | 1 Master |
| 2 Able Seamen | 1 OIM |
| 1 Ordinary Seamen | 1 Chief Mate |
| 8 Survival Craft Crewmen | 1 3 rd Mate |
| | 2 Able Seamen |
| | 1 Ordinary Seamen |
| | 1 Chief Engineer |
| | 1 Maintenance Supervisor |
| | 1 1 st Assistant Engineer |
| | Oiler / Motorman |
| | 8 Survival Craft Crewmen |

At the time of the explosion that occurred on April 20, 2010, the Deepwater Horizon was properly manned under national and international standards for a DPV Unit despite the clerical error on the MSMC by the Maritime Administrator that referred to the Deepwater Horizon as a Self-Propelled MODU instead of a DPV Unit.

The issuance of the incorrect MSMC for the Deepwater Horizon did not effect the Classification and certification of the Unit; it has remained properly Classed and certified as a DPV.

Sincerely,



Captain Thomas F. Heinan
Deputy Commissioner of Maritime Affairs
The Republic of the Marshall Islands