

Sender

Company's Name
Address



October 9, 2001

U.S. Immigration and Naturalization Service
Texas Service Center
P. O. Box 852135
Mesquite, TX 75185-2135

Re: I-140 Immigrant Petition for Alien Worker – Multinational Manager
Petitioner: Company's Name
Beneficiary: SMITH, A. B.

Dear Sir or Madam:

This letter is written in support of our company's Immigrant Visa Petition on behalf of A.B. Smith for the managerial occupation of Process Safety Management Baseline Coordinator in city, state.

THE PETITIONER

ABC. and XYZ merged on date, to form COMPANY'S NAME the world's third-largest energy company in terms of revenue. In April 2000, COMPANY'S NAME acquired EFG which became a wholly-owned subsidiary. On date, COMPANY'S NAME changed its name to COMPANY'S NAME. COMPANY'S NAME stock is principally traded on the London Stock Exchange.

COMPANY'S NAME is a wholly-owned subsidiary of COMPANY'S NAME and is the highest corporate entity for COMPANY'S NAME in North America. COMPANY'S NAME, a wholly-owned subsidiary of COMPANY'S NAME, changed its name on May 1, 2001 to COMPANY'S NAME. For purposes of this statement, the entire COMPANY'S NAME Group of Companies will be referred to as "COMPANY'S NAME".

Through our international and domestic affiliates and subsidiaries, COMPANY'S NAME is engaged in finding and producing crude oil and natural gas, as well as refining, transporting and marketing a wide range of petroleum products throughout the world. As of the end of 2000, the combined companies employed over x,000 individuals worldwide. Total revenue in 2000 was approximately \$x billion with over \$x billion net profit.

Company's Name's Process Safety Technology Team (PSTT) was formed in 1992 to address implementation of the U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) regulations on Process Safety Management (PSM) for hazardous materials within our Upstream Sector. The PSTT coordinated initial

development of Company's Name performance-based compliance philosophy, and continues to maintain that document today. It is charged with applying safety performance standards throughout our U.S. operations; for compliance with OSHA safety regulations and international and domestic requirements; and for satisfying American Petroleum Institute (API) standards. The PSTT role has been expanded to develop the compliance philosophy and guidance document for the implementation of the U.S. Environmental Protection Agency (EPA) regulation 40 CFR Part 68, Risk Management Programs (RMP) under Clean Air Act Section 112(s)(7). This has been labelled the EPA RMP Baseline.

The main role of the Process Safety Technology Team is to support the strategies and goals of Company's Name engineering and construction efforts worldwide, and to establish and assist with implementation, administration, and auditing of Process Safety Management Systems for the Upstream Sector, portions of the Downstream Sector, worldwide engineering and construction projects, and as requested by the Chemicals Sector. The Process Safety Technology Team provides hazard analysis leaders, broker manages Process Hazard Analysis (PHA) through supervision of competent PHA professionals including degreed engineers and process safety management professionals, and conducts implementation consulting and regulatory-required auditing. As of 1996, the Process Safety Technology Team supported all COMPANY'S NAME's engineering and construction projects with hazard analysis services and process safety consulting. In 1997, the Team started providing hazard analysis support to portions of Company's Name Downstream Sector. The current goal of the Process Safety Technology Team, in addition to the above, is to establish Process Safety Management guidance documents to support the Safety Management Systems at all of Company's Name international locations. In 1999, the PSTT was reorganized into the Upstream Technology Group (UTG).

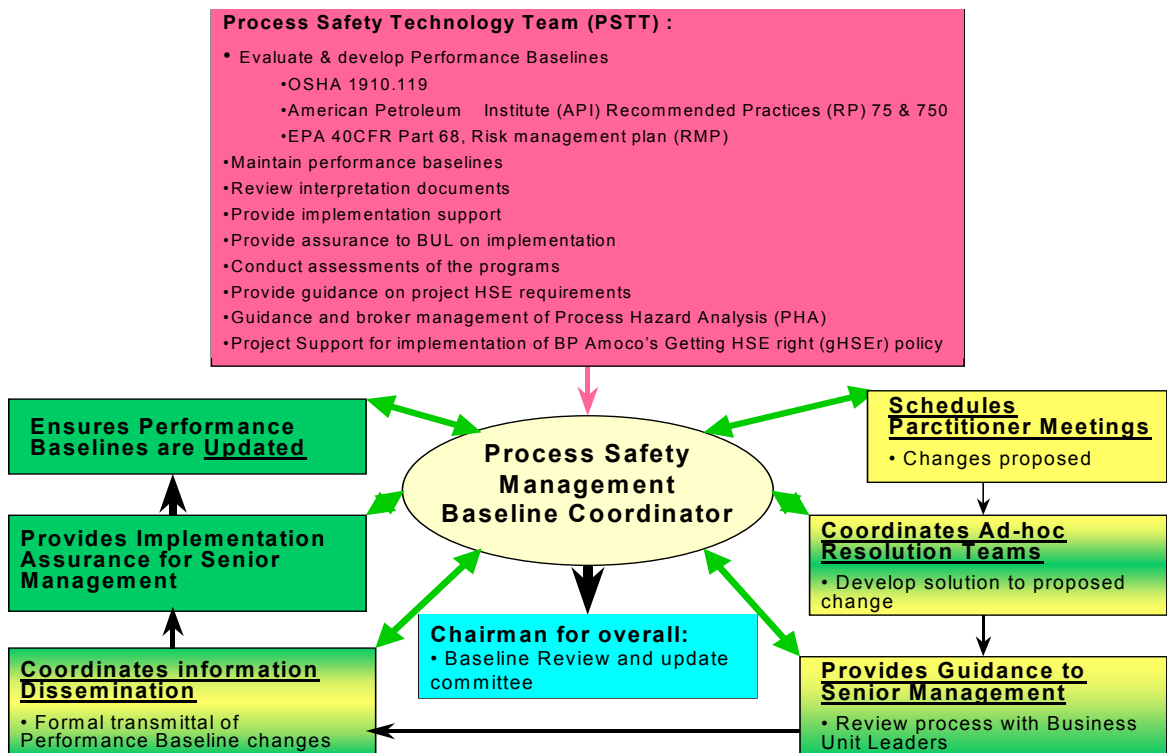
COMPANY'S NAME has embraced Process Safety Management as the manner in which we conduct our business. We apply technology to maximize the value of process safety management. Senior COMPANY'S NAME management has adopted OSHA requirements for the management of highly hazardous chemicals, which define the legal standards for Process Safety Management with regard to employees. The document that symbolizes COMPANY'S NAME's approach to Process Safety Management for domestic operations is called the "Process Safety Management Performance Baseline – USA Operations." The "performance baseline" is the minimum acceptable level for an overall process safety management system. The "Process Safety Management Performance Baseline" is a facility management system intended for utilization at all operating locations within the Upstream Sector and selected Downstream locations throughout the lower United States. The International Onshore and Offshore Process Safety Management Baselines, based on API RP 75 and 750, allow Company's Name international operations to meet the internal COMPANY'S NAME PSM standard adopted by the corporation.

In support of engineering and construction projects worldwide, the PSTT assists in the development of project-specific Safety Management Systems (SMS) that are aligned with corporate goals and health, safety and environmental (HSE) expectations as outlined in Company's Name "getting HSE right" (gHSEr). In addition, the PSTT ensures that Safety Management Systems developed are aligned with corporate business policies, commitments and expectations.

DUTIES OF THE L-1A MANAGER

In connection with development of a Process Safety Management Strategy for Upstream operations, select Chemical operations and Downstream activities, the Process Safety Technology Team requires the full-time services of a Process Safety Management Baseline Coordinator (“Coordinator”) on a permanent basis in city, state. The Coordinator primarily manages the baseline performance function and exercises significant discretionary authority over the day-to-day operations of the same. On a senior level, he chairs the senior management committee that updates and revises COMPANY’S NAME’s Process Safety Management Baselines. The Coordinator supervises both annual and periodic process safety management reviews. He works with the Process Safety Technology Group within UTG to develop annual departmental and individual development objectives. The scope of this position covers both Upstream and applicable Downstream operations. His oversight of process safety management covers activities from the exploration phase through to development and production of oil and gas leases. Evaluation of a Business Unit’s PSM performance is done through interactive discussion with the Business Unit Leader (BUL) and his senior staff responsible for PSM implementation and maintenance.

The Process Safety Management Baseline Coordinator coordinates and finalizes proposed revisions to existing baselines established in the annual baseline meeting, attended by the practitioners of the baseline. In addition, he coordinates the resolution of proposed changes at these meetings through development of a team or teams of PSM / RMP specialists. The makeup of these specialist teams includes degreed engineers, certified safety professionals and consultants to ensure that a comprehensive resolution to the proposed change or changes is reached. The resolution will involve strategic direction provided by the Coordinator to the team of PSM / RMP assembled and potentially to UTG degreed engineers and outside agencies as required. Upon obtaining a consensus from the PSM / RMP resolution teams, the Process Safety Management Baseline Coordinator coordinates the senior management review and the transmittal of the finalized changes for implementation.

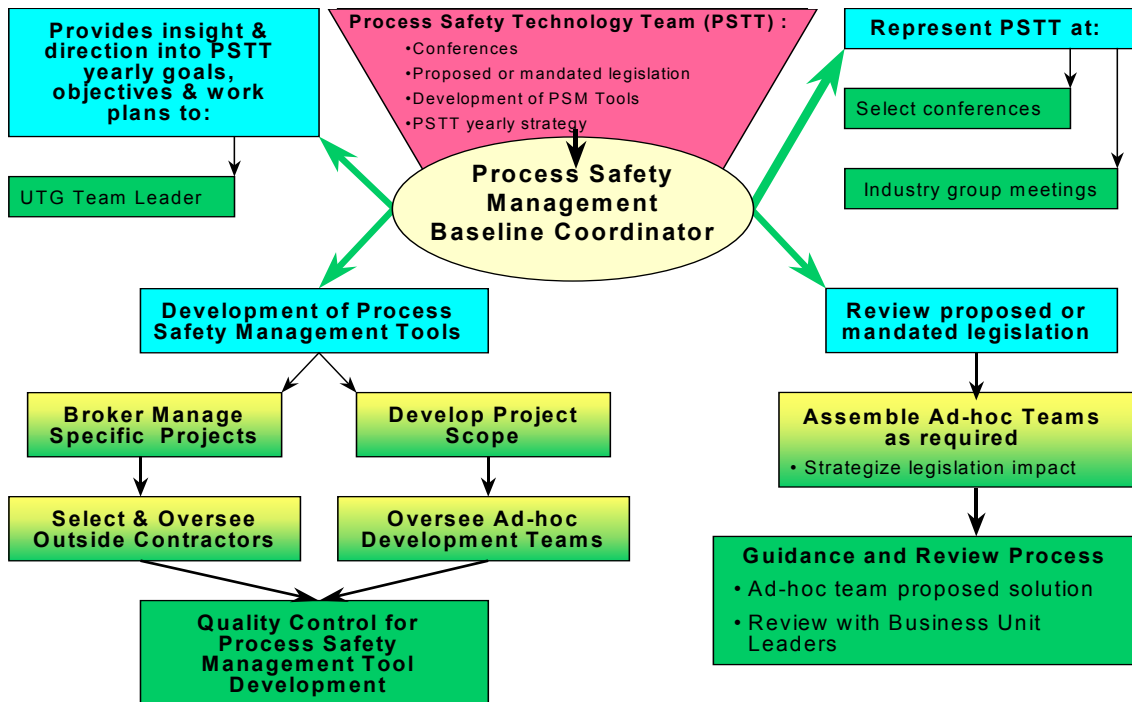


Flow Chart for Baseline Revisions

Outside of COMPANY'S NAME, the Process Safety Management Baseline Coordinator represents our Process Safety Technology position at selected governmental and industry groups. These could range from the Exploration and Production Forum in London to the American Petroleum Institute in Washington, DC. Inside of COMPANY'S NAME, the Coordinator represents the UTG Process Safety Technology Team at numerous meetings that involve Process Safety Management Technology on an as-needed basis.

The Process Safety Management Baseline Coordinator coordinates teams of degreed professionals on an ad-hoc basis to review proposed and mandated legislation for their impact on COMPANY'S NAME's exploration and production operation. From these reviews, proposals are developed by multiple teams of degreed COMPANY'S NAME professionals to ensure compliance throughout the company. The Coordinator provides strategic guidance and direction to the overall process, and is accountable for the review of these changes through proactive review meetings, monitoring process progress against predetermined milestones, and assessment of any changes implemented by the affected COMPANY'S NAME groups.

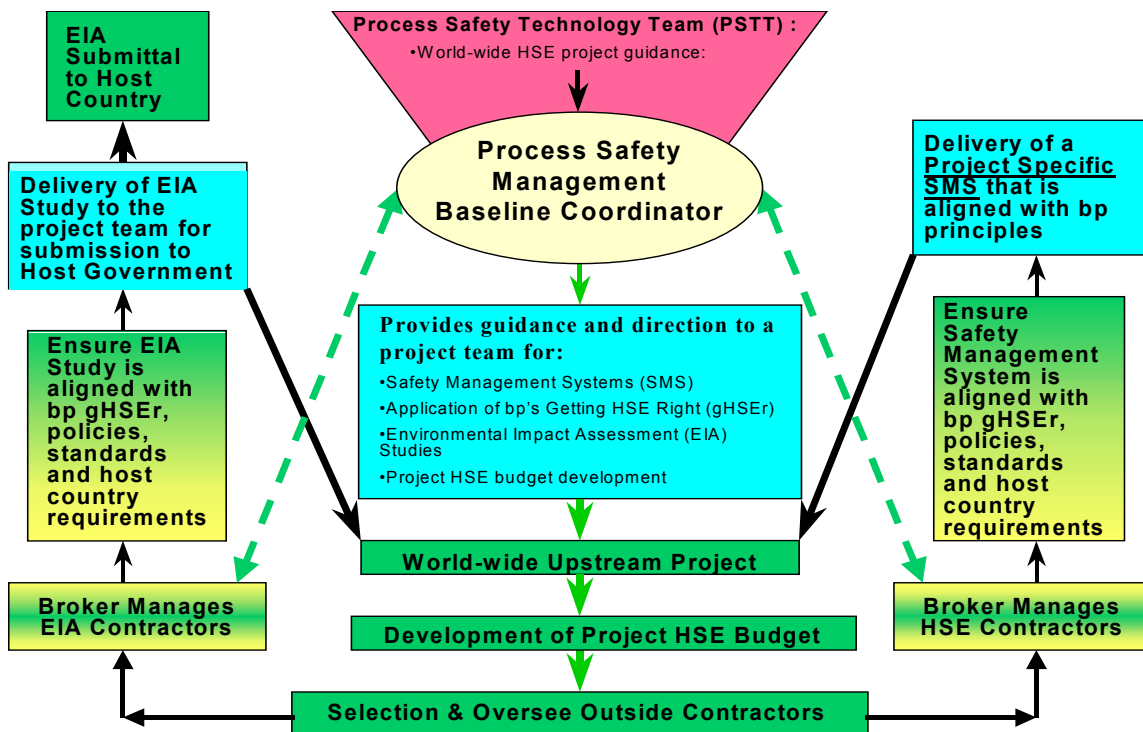
The Process Safety Management Baseline Coordinator ensures the continuous development of Process Safety Management tools by assessing the scope of development projects undertaken by multi-skilled COMPANY'S NAME teams. He also develops broker management projects to create and roll out new process analysis methodologies in the areas of process hazard analysis and operability studies. The Coordinator consults with COMPANY'S NAME international subsidiary Country Managers to coordinate the work of third party degreed professionals in the development of suitable Process Safety Management systems. He liaises with both internal customers and the external agencies providing the manpower to complete the project. He is accountable for the quality of the final project product developed during this process.



Flow Chart of Process Safety Management Baseline Coordinator Activities

In support of worldwide engineering and construction projects, the Process Safety Management Baseline Coordinator supervises teams of degreed engineers and environmental scientists to ensure that project-specific Safety Management Systems are aligned with Company’s Name getting HSE right (gHSEr) program. In support of many international projects, development of an Environmental Impact Assessment (EIA) as outlined by the World Bank guidelines or host country regulations is required. The Coordinator oversees development of EIA’s through the use of degreed engineers, environmental scientists, environmental engineering companies and academic professionals from the host country, the United States, or other countries. The Coordinator manages delivery of the final product.

To oversee baseline revisions, SMS development, and EIA preparation, the Process Safety Management Baseline Coordinator develops and presents the budget for authorization. This budget is managed under the discretionary power of the Coordinator. A typical Health, Safety and Environmental budget for a major capital project is 3 – 5% of the project capital expenditures.



Flow Chart of Process Safety Management Baseline Coordinator Project Activities

Each year, the Process Safety Management Baseline Coordinator consults with other senior COMPANY’S NAME managers in domestic and international operations regarding the level of desired service that their organizations plan to use in the upcoming budget cycle. He compiles and prioritizes such requests to ensure that adequate staffing is in place within the Process Safety Technology Team to meet their anticipated needs. The Coordinator prioritizes requests for customized work plans from Operating Center Foremen, Business Group Managers, Production Managers and Engineering Supervisors. In collaboration with the appropriate Process Safety Technology Team Members, the Coordinator then establishes the work plans for execution.

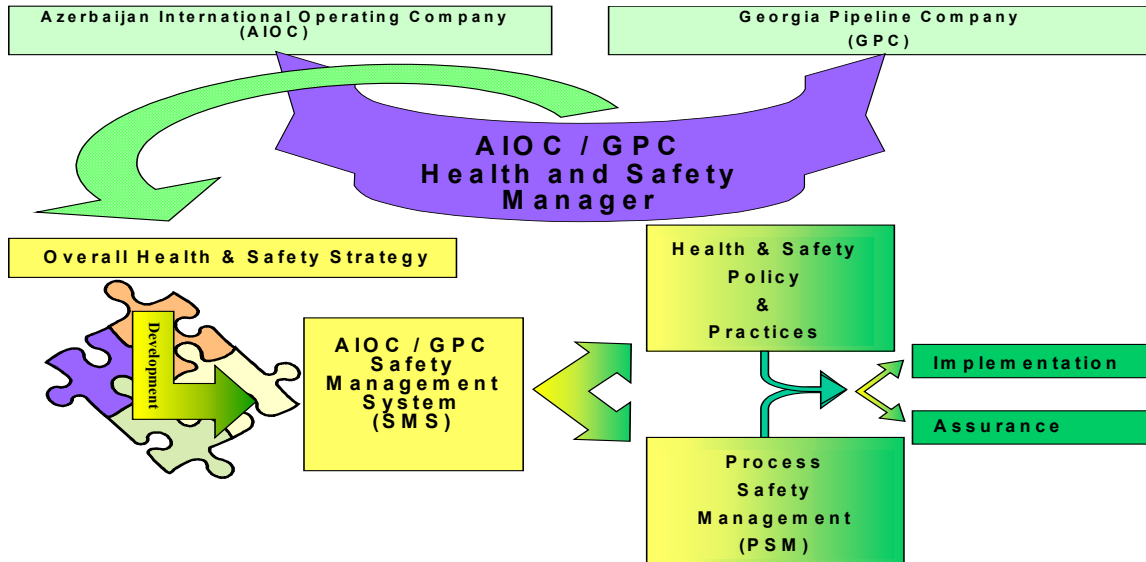
THE BENEFICIARY

A. B. Smith, a citizen of Canada, has been an employee of the COMPANY'S NAME organization since February 1976, when he joined our wholly owned Canadian subsidiary, HIJ. He served HIJ in several positions of increasing responsibility, including Senior Plant Operator, Gas Processing Plant Shift Supervisor, Maintenance Supervisor, Field Foreman and Platform Supervisor. In 1983, he was transferred to HIJ's country Exploration Company where he was responsible for all daily and maintenance operations of the offshore facilities. In March 1987, he was transferred to HIJ country Petroleum Company as Offshore Installation Manager. He was soon promoted to Onshore Production Supervisor and then to Materials and Operations Coordinator. Mr. Smith was sent by HIJ country to country, UAE for 18 months as its Operations Representative during the construction phase of the P-15 jackets and topside modules. From May 1993 to June 1997, Mr. Smith worked for COMPANY'S NAME in city, state as a Process Safety Management Consultant. In the above positions, Mr. Smith supervised a number of degreed professionals to ensure delivery of the yearly objectives set. Throughout these periods, Mr. Smith participated in the selection, interviewing and yearly performance review of the staff under his supervision.

Mr. Smith's transfer to city in 1993 was key for COMPANY'S NAME to utilize his vast operational and managerial experience in the area of Process Safety Management during the development and review of its Process Safety Management Performance Baseline – USA Operations. His placement allowed COMPANY'S NAME to successfully complete the Baseline and make progress on development of international versions of the document. While in city, Mr. Smith was a member of Company's Name Process Safety Technology Team.

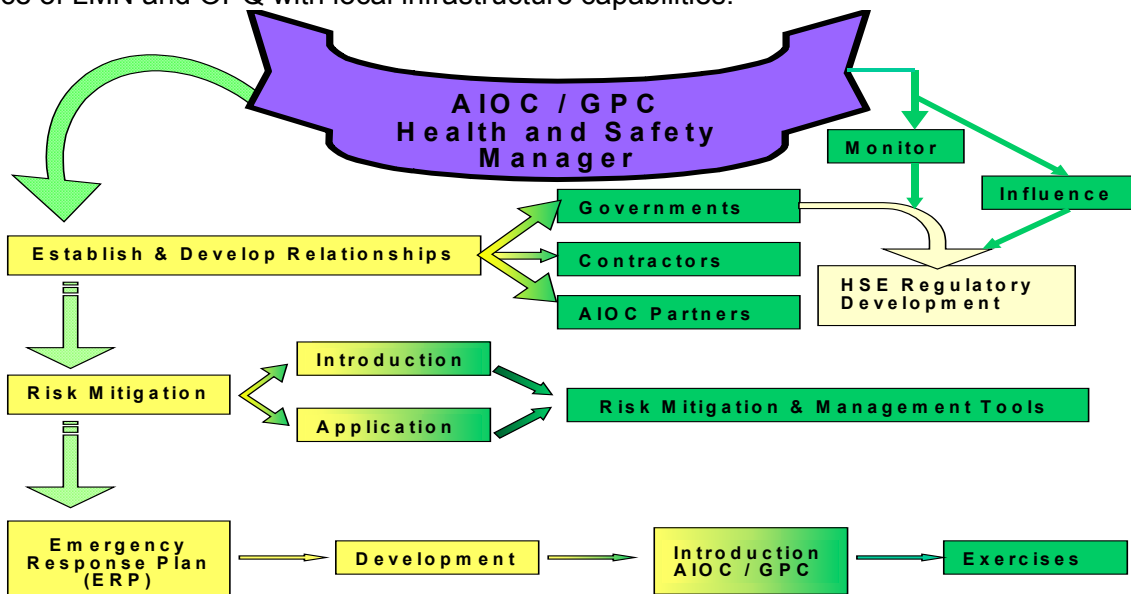
In the last few years of his U.S. assignment, Mr. Smith was seconded by HIJ region to the country International Oil Company (LMN), responsible for application of Process Safety Management procedures and technology. Located in country, LMN is an international consortium of 13 companies, including COMPANY'S NAME, whose purpose is to develop the oil and natural gas fields off the coast of country, ship the oil and gas from offshore facilities to onshore processing facilities, and transport the oil through pipelines from the X Sea to the Y Sea and onto international shipping lanes. In later 1995, Mr. Smith served as Process Safety Manager for the construction of LMN's Chirag Early Oil Drilling and Production Platform in country. From May 1996 to June 1997, while still based in city, Mr. Smith rotated between country and city to discharge responsibilities as the Health and Safety Manager for LMN due to the departure of his predecessor.

From June 1997 to September 1998, COMPANY'S NAME sent Mr. Smith to city to represent the company's health and safety interests in the LMN consortium. As Manager for Health and Safety, Mr. Smith developed the health and safety strategy, including Process Safety Management, for all LMN and the OPQ operations. He was accountable for ensuring the timely and cost-effective implementation and application of these policies and practices by the numerous departments with LMN and OPQ. Assurance was undertaken through Mr. Smith's direction and oversight of Gap Analysis Reviews and Implementation Audits.



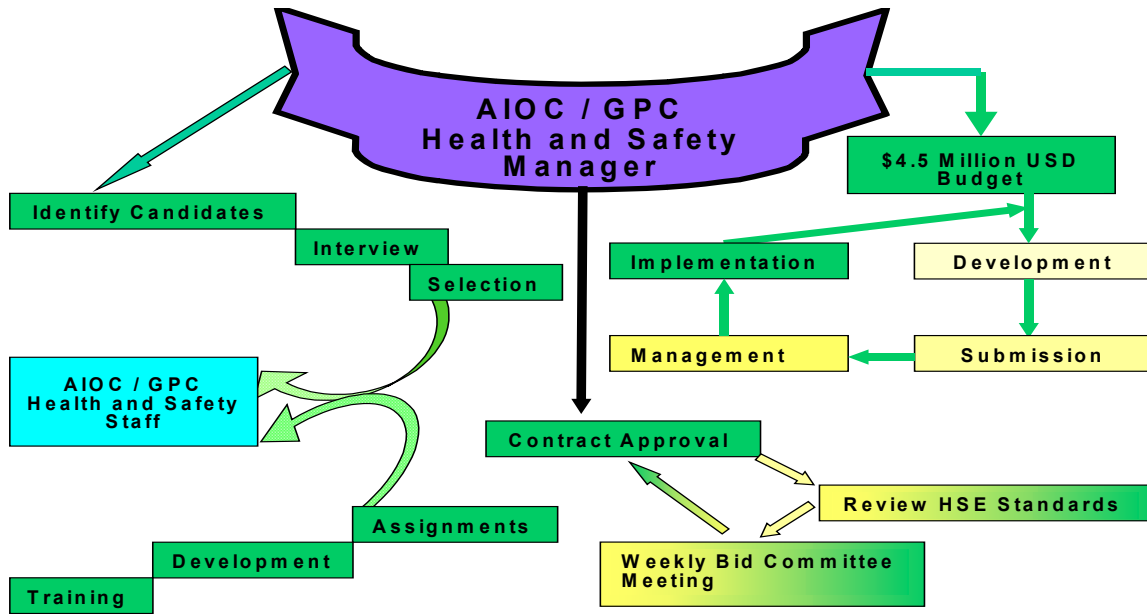
LMN / OPQ Health and Safety Manager Deliverables

In city, it was Mr. Smith’s job to establish long-term relationships with appropriate host government personnel, business partners, contractors and organizations within country, country and elsewhere. He monitored the work of country authorities regarding development of an appropriate regulatory model that included HSE regulations for project development and ongoing operations. As Health and Safety Manager, he maintained a framework for managing the risks of major safety hazards in the development of LMN activities through the introduction and application of suitable risk management tools. Mr. Smith coordinated the development, introduction and implementation of a safety management system that addressed the unique organizational requirements and frontier aspects of LMN’s operations. In line with the requirements set out in the LMN Safety Management System, he supervised development of an Emergency Response Plan (ERP) utilizing a reputable U.S. contractor specializing in ERP development. To assure LMN senior management and business partners that the ERP was adequate for the scope of LMN/OPQ operations, mock ERP exercises were held in both country and country under Mr. Smith’s direction that tested application of the ERP and interface of LMN and OPQ with local infrastructure capabilities.



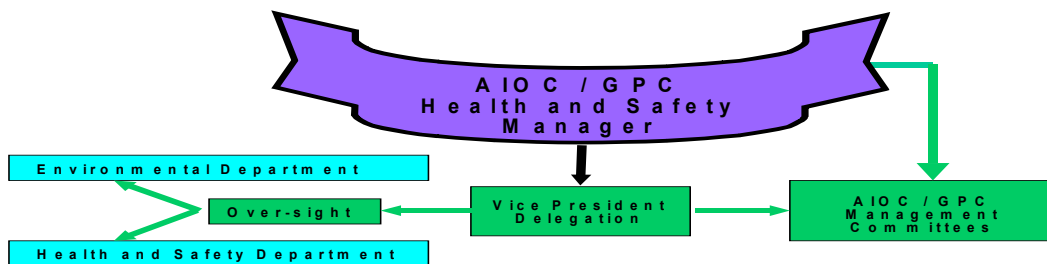
LMN / OPQ Health and Safety Manager Deliverables

During his time in city as Health and Safety Manager, Mr. Smith implemented a national staff development strategy for LMN and OPQ that outlined future training, assignment and professional development for all staff under his supervision. This development strategy has allowed LMN and OPQ to ensure that challenging positions of increased responsibility are available to the local staff of both companies. In line with the national staff development strategy, Mr. Smith had overall responsibility to interview, select and staff the Health and Safety organizations of both LMN and OPQ. He had control over the development, submission, management and implementation of a \$x million health and safety budget developed and approved on a yearly budget cycle. In the contract approval process for LMN and OPQ, all health and safety standards were subject to review by Mr. Smith's organization and confirmed by him at weekly bid committee meetings.



LMN / OPQ Health and Safety Manager Deliverables

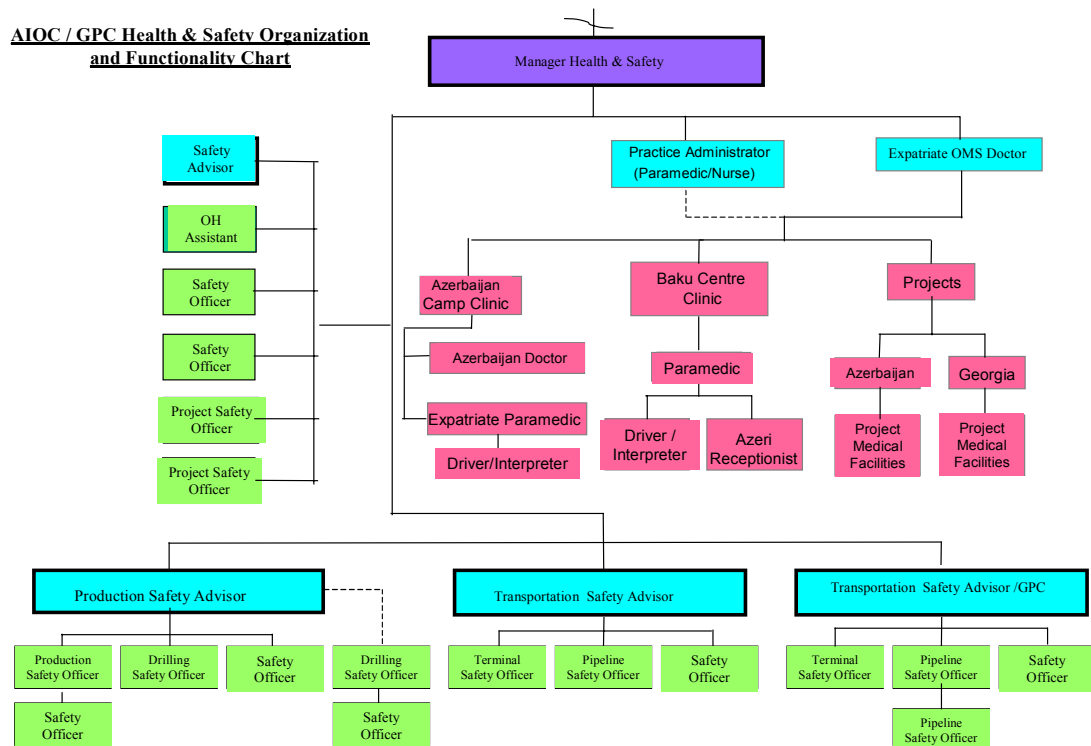
On occasion, Mr. Smith was deputized to represent the Health, Safety and Environmental Vice-President. This required Mr. Smith to oversee daily strategic direction of the Health, Safety and Environmental departments of LMN and OPQ, and to represent the same at local governmental agencies on behalf of LMN. During this time, Mr. Smith sat on the senior management team that managed the development activities of LMN and OPQ. A portion of his time was spent serving on senior management committees that directed policy for LMN and OPQ on all regular matters handled by the senior management team from human resources to contractor selection.



LMN / OPQ Health and Safety Manager Deliverables

Mr. Smith was the Project Health and Safety Manger on the Western Route Export Pipeline Project (WREPP), a pipeline refurbishment project running from city to city on the X Sea in country. The country section was managed from city, and the country section from city, country. The Project Health and Safety Manger was responsible for daily compliance of contractors and sub-contractors with the health and safety standards established in the LMN Safety Management System. This obligation required the selection and staffing of quality personnel within OPQ to manage day-to-day activities. Mr. Smith was also charged with developing the longer-term health and safety strategy for OPQ, and ensuring it was aligned with the efforts and successes enjoyed by the LMN organization.

In his managerial position as LMN's Health and Safety Manager, Mr. Smith oversaw operation of the LMN Western Medical Facility in city, country and city, country plus medical support for the WREPP and LMN Early Oil Projects. This required overseeing a medical staff of x medical doctors, y registered nurses, z paramedics, and associated support staff. To meet the objectives set by LMN for the Health and Safety Department, Mr. Smith's organization consisted of x degreed expatriate Sr. Safety Engineers, y degreed National Safety Officers from country and country, and x administrative support staff. Mr. Smith was responsible for interview, selection and appraisal of all staff within his organization. To address ad-hoc projects such as development of an Emergency Response Plan (ERP) and audit protocol, Mr. Smith coordinated procurement, selection and supervision of competent contractors to meet unique requirements set out by LMN or OPQ.



LMN Health and Safety Organization and Functionality Chart

In 1998, COMPANY'S NAME recognized the need to have a person of Mr. Smith's knowledge and experience in the leadership position of Process Safety Management

Baseline Coordinator. Therefore, in October of that year, COMPANY'S NAME asked him to relocate back to city on a temporary basis as the Process Safety Management Baseline Coordinator under the provisions of the L-1A visa program.

Incorporating sound Process Safety management within our HSE philosophy is key to our successful corporate future in the 21st century. The position of Process Safety Management Baseline Coordinator requires an individual with broad knowledge of Company's Name international business commitments, products, services, technologies, strategic plans, and process safety and environmental management objectives to ensure that they are effectively implemented in our development activities. Due to Mr. Smith's unique and varied domestic and international experience, he has successfully fulfilled the requirements of this position.

In view of his acquired managerial experience in numerous international locations and the United States, work background and knowledge of Company's Name Process Safety Management Technology, COMPANY'S NAME wishes to continue to employ Mr. A. B. Smith on a permanent, full-time basis as the Process Safety Management Baseline Coordinator in city, state. Based on the foregoing, it is respectfully requested that the attached petition be approved.

Should you require further evidence or information, please do not hesitate to contact the undersigned at your convenience.