

PUBLIC SUBMISSION

As of: December 13, 2010
Received: December 13, 2010
Status: Pending_Post
Tracking No. 80bb4822
Comments Due: December 13, 2010
Submission Type: Web

Docket: BOEM-2010-0034

AD68 - Oil and Gas and Sulphur Operations in the Outer Continental Shelf–Increased Safety Measures for Energy Development on the Outer Continental Shelf

Comment On: BOEM-2010-0034-0001

Oil and Gas and Sulphur Operations in Outer Continental Shelf: Increased Safety Measures for Energy Development on Outer Continental Shelf

Document: BOEM-2010-0034-DRAFT-0023

Comment from Brett Morry, Self

Submitter Information

Name: Brett Morry

Address:

20310 Stone Falls Ct
Cypress, TX, 77433

Email: morrytx@aol.com

Phone: 832-279-3210

Organization: Self

General Comment

Ref 4310-MR-P 30 CFR Part 250

Docket ID: BOEM-2010-0034

RIN 1010-AD68

Regarding BOP Subsea system requirements and subsequent training of ROV personnel in § 250.442 I draw reference to to paragraph (e).. "the crew must be trained in the operation of the ROV. The training must include simulator training on stabbing into an ROV intervention panel on a BOP stack."

Certain current available simulators have the ability to provide for much more than this basic of requirements. The most sophisticated trainers allow for the ability to train on the exact BOP type in use given an accurate 3D model in advance and are able to provide for scenario based training of scripted emergencies, i.e DP run-offs or emrgency disconnects when supplied with the manufacturers emergency disconnect procedures. Operator emergency disconnect procedures can be implemented into the simulator to provide for accurate simulations of real world events. I highly recommend enhancing the training aspect of your regulations to cover this aspect of industry.