PUBLIC SUBMISSION

As of: December 02, 2010
Received: December 01, 2010
Status: Pending_Post
Tracking No. 80bab420
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-0014
Comment from Colin Leach, Argonauta Drilling Services L.L.C.

Submitter Information

Name: Colin Leach
Address:
12012 Wickchester, Suite 330
Houston, TX, 77079
Email: cleach@argonenergy.com
Phone: 832-452-3729
Organization: Argonauta Drilling Services L.L.C.

General Comment

We must be careful not to over-react. The Macondo/Horizon catastrophe or something like it is unacceptable, but it is perfectly possible to carry out operations to achieve similar aims without resulting in the same results.

1. There must be a total focus on the prevention of all potential incidents in the future. This involves looking more closely at well design and in particular at the training of the rig crews that operate such wells.

The use of realistic well control modeling tools should be the "norm". This will allow the design to be be properly evaluated and will allow the crew to be trained to understand what should be considered "normal", such that a "non-normal" event can be readily recognized and accepted by all.

2. As has been recognized in the "Interim Final Rules" the proper application of 2 barriers is essential. Methods must be devised such that it is transparent to everyone how many barriers are present and the condition of each and every barrier.

The goal of the above activities is to ensure that catastrophic incidents do not occur in the first place.

3. In the event that a blow-out still occurs it is essential that the well design allows for successful shut-in of the well using (potentially) an additional BOP or other device. This may be limited to an oil reservoir versus a gas reservoir, but in any case will allow for the well to be shut-in without fear of broaching.

This will limit the pollution that occurs to perhaps 10 days versus the 86 days seen for Macondo.

For deepwater wells, it should be assumed that a well flow-rate of 50-60,000 BOPD will occur. For shallow water wells, the flow potential is likely to be significantly less.

No, we cannot ensure that no future blow-outs will occur. We must aim to (1) limit the possibility (which is the only method of avoiding fatalities) and (2) limit the resultant pollution by adopting well designs which allow for (somewhat) rapid intervention.