

PUBLIC SUBMISSION

As of: November 17, 2010
Received: November 16, 2010
Status: Pending_Post
Tracking No. 80b93c23
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-0011

Comment from Dallas Davis, JAB Energy Solutions

Submitter Information

Name: Dallas Davis

Address:

262 N Sam Houston Parkway E

Suite 230

Houston, TX, 77060-2013

Email: ddavis@jabenergysolutions.com

Phone: 832-350-9580

Organization: JAB Energy Solutions

General Comment

The incorporation by reference of API RP 65-2 in 250.415 (f) includes a definition of a mechanical barrier. This either confuses or contradicts the use of the phrase "mechanical barrier" in sections 250-420(b)(3), 250.1712(g) and 250.1712(h). The description of a "seal achieved by mechanical means between two casing strings or a casing string and the borehole" would not be possible regarding an existing well, specifically for the temporary or permanent abandonment, and does not include seals that are not in an annulus.

Question: Do cast iron bridge plugs and retainers/packers without tubing installed meet the requirement for mechanical barriers?

Comment: The description of "flow path" would be improved by commenting on examples and/or by providing a definition and not including potential paths, i.e. previously verified or tested mechanical barriers are accepted without retest. Flow paths in the broadest terms would include annular seal assemblies which may not be accessible on existing wells. The assumption that all casing strings can be cut and pulled would result in exceptions in the majority of cases and would introduce a health and safety risk to operating personnel and equipment currently not present.
