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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

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Comment from DEAN SWANZY, PETROBRAS AMERICA

Submitter Information

Name: DEAN SWANZY

Address:

10350 RICHMOND

SUITE 1400

HOUSTON, TX, 77042

Email: DSWANZY@PETROBRAS-USA.COM

Phone: 713-808-2733

Organization: PETROBRAS AMERICA

General Comment

PLEASE SEE THE TWO QUESTIONS BELOW - CLARIFICATION NEEDS TO TAKE PLACE

CONCERNING § 250.420 What well casing and cementing requirements must I meet?

(b) * * *

(3) For the final casing string (or liner if it is your final string), you must install dual mechanical barriers in addition to cement, to prevent flow in the event of a failure in the cement. These may include dual float valves, or one float valve and a mechanical barrier. You must submit documentation to BOEMRE 30 days after installation of the dual mechanical barriers.

Question :

Does the dual mechanical barrier requirement apply to just the inside of the casing or to both the inside and annulus flow paths ? We believe you are meaning the inside only.

CONCERNINIG § 250.423 What are the requirements for pressure testing casing?

(c) You must perform a negative pressure test on all wells to ensure proper casing installation. You must perform this test for the intermediate

and production casing strings.

Question :

What is the definition of intermediate casing? The rule states a negative pressure test is required for intermediate and production casing. If drilling liners are set below intermediate casing is additional negative testing required ?
