

PUBLIC SUBMISSION

As of: October 15, 2010

Received: October 14, 2010

Status: Pending_Post

Tracking No. 80b6f597

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-0003

Comment from John Burman, Self

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General Comment

Require that all certifications needed by a Registered Professional Engineer be done by a Registered Professional Petroleum Engineer.

It makes no sense at all to utilize any PE. If so, at least require a BS in Petroleum Engineering. There is no specification to determine how any Registered Professional Engineer is "capable of reviewing and certifying that the ... is appropriate for the purpose for which it is intended under expected wellbore conditions."