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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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General Comment

It appears that some of the requirements of NTL 2010-N05 which applied to workover BOPs have been omitted in the revision to 30 CFR 250.5XX and 250.6XX. Specifically, verification that the Blind/Shear is capable of shearing all pipe in the well at MASP has been omitted for workover and coiled tubing operations. Verification of this capability is as important in workover as it is in drilling, for both surface BOPs and subsurface BOPs. API RP 16ST, "Coiled Tubing Well Control Equipment Systems", Section 12, "Well Control Equipment Testing" should be referenced by 30 CFR 250.6XX in addition to the reference to API RP 53.