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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 Marc Young, PE, Self

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General Comment

The intent of Congress and the OCSLA does not appear to be complied with by the proposed rules. The use of a registered Professional Engineer to certify casing and cementing programs when "The Registered Professional Engineer must be registered in a State in the United States but does not have to be a specific discipline" does not appear to comply with the allowance for coordination with local Coastal Affected Zone States to have input. Two apparent deficiencies are apparent. One is a licensed professional engineer should not be certifying anything that he is not competent to certify due to his education, training and experience. The second is that the engineer should be licensed in the Coastal Zone Affected State due to the differences that occur in licensing requirements. Some states are more liberal than others in the exemptions allowed and the requirements for discipline specific engineering licensure. If Texas wants to allow a higher risk then Texas offshore Coastal Affected Zones should be the only zones that are allowed to have such higher risk to be taken. If Louisiana or Mississippi want to be more restrictive then their offshore waters should be more restrictive. This seems to be the intent of the Coastal Zone Affected State language in the federal statutes. As currently proposed a licensed engineer from the state of minimum requirements can be selected. Sort of like South Dakota for credit cards. Good for business but not good for protection.
