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Department of the Interior
Bureau of Ocean Energy Management
Regulation and Enforcement
381 Elden Street, MS-4024
Herndon, Virginia 20170-4817

Attention Regulations and Standards Branch

Subject: Comments to Interim Rules 30 CFR 250 Increased Safety Measures

Regulation Indentification Number 1010-AD68

Dear Sirs

Below please find my comments to the Interim Rules proposed for Oil and Gas Operations on the Outer Continental Shelf. Please endure a synopsis of my background so to establish credentials to comment on this matter. I am a graduate engineer and have worked exclusively in deepwater drilling and production for 37 years. I led a drilling operation that set 7 consecutive water depth drilling records starting in 1979 off Newfoundland in 4876 feet of water and terminating with a well in 6952 feet of water in 1984 off the US East coast. During this time we developed the deepwater drilling techniques that are still used today. This program was done safely and without incident. I also participated on the Congressional Studies on Deepwater Safety in 1982. In general I am not in favor of strict government oversight.

Sincerely

Robert P Herrmann

Citation	Recommendation	Comments
250.420(b)(3)	Installataion of dual barriers	Safe cementing procedures need to be standardized however as worded these provisions are very confusing and may lead to unintended prohibitions. Firstly it is not clear when these dual barriers are required. Logically these rules apply when temporarily abandoning a well . This needs to be spelled out. Secondly the rules refer to API 65 part 2. This document is currently out for comments also due back 15 December and is inappropriate for that reason alone. Furthermore the rules seem to encourage use of devices described in Section 3 of RP65 some of which have never been used in deepwater and are in fact on dubious utility. It is agreed that more stringent cementing practices are in order but these proposed rules are too confusing to serve this purpose. This section needs to be revisited and specific, practical, recommended practices set out.
250.442© and250.515(e)	ROV intervention. ROV capacity to close 1 pipe ram and 1 shear ram and unlock LMRP connector	The minimum function requirements are too low. All the rams and the annular preventors all need an ROV function. The LMRP connector and the Wellhead connector need an ROV function so in a blowout so another BOP stack can be landed on the wellhead or the original BOP.

Citation	Recommendation	Comments
250.442 251.515(e) 250.615(e)	Provision for Deadman and Autoshear	The Deadman must include a disconnect function. When used the rig is likely to be without power or the moonpool on fire. Without a Deadman disconnect the rig will become moored by the riser and BOP and there will be great danger of breaking off wellhead in this event
250.449(j), 250.516(d)(8)	Stump test ROV intervention functions.	This does not go far enough. This was the general practice before Mocando and is insufficient. It is necessary that the BOP ROV functions be regularly tested at the seabed with the ROV that would be used in an emergency. The only requirement of the stump test should be to test the plumbing. The BOP ROV functions should be tested at each BOP test when at operating hydrostatic pressures and temperatures
250.449(k) 250.516(d)(9)	Stump test the Autoshear and Deadman. Test the deadman after initial landing.	Both the Deadman and Autoshear should be tested on the seabed. Moreover the Deadman should include a disconnect function. However the LMRP connector should not be unlocked during this test. Rather the LMRP disconnect function should be plumbed in such a way that during the test the fluid can be vented to sea rather than to the unlatch side.
250.45(i)	Retrieve BOP if blind /shear rams activated during well control.	Only if something was sheared.