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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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General Comment

1. Making thousands of “shoulds” contained in all the API Recommended Practices & Standards incorporated in the CFR’s into “musts” with researching the impact of each one will lead to contradictory situations since a large part of the API guidance is a recommendation based on evaluation of the problem and possibly unique circumstances. I recommend that BOEMRE do their job, research each instance of “should” and seek industry comments on when, if & why a change to “must” is appropriate. To arbitrarily make that decision and turn it into federal law is a failure to do the right thing.
2. 30CFR250.416(e) requires independent 3rd party verification of pipe shearing calculations at MASP for the blind-shear rams in BOP stack. Prior to the Interim Final Rule being issued 10/14/10 this item didn’t require the independent 3rd party verification of shear calcs. Prudent operators always do those calcs to 1) comply with the law as it was written and 2) feel comfortable that pipe can be sheared in an emergency. I don’t see the requirement for independent 3rd party verification making things safer in the GoM. Why can’t BOEMRE regulators just have the operators do what was already in the regs? Shear calcs are very straight forward and tend to be conservative by 30% when it comes to predicting the hydraulic pressure needed to shear tubulars with MASP at the BOP.
3. 30CFR250.416(f) requires that an independent third party verify that a subsea BOP stack is fit for purpose. (f)(2) further requires that the subsea BOP stack has not been compromised or damaged from previous service – no guidance is given on how one is to determine that the subsea BOP hasn’t been compromised or damaged. Is the operator to include in the APD’s on multi-well projects wher it makes senses to hop the BOP stack from well to well their plan to have a successful subsea function test and pressure test be evidence that this requirement has been met?