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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

4. 30CFR250.420(a)(6) requires that a Registered Professional Engineer certify barriers across each flow path and that a well's casing & cementing design is fit for its' intended purpose under expected wellbore conditions. I know several RPE's whose area of expertise isn't well design or construction. I know very few drilling & completion engineers with both sufficient expertise to make the required assessment and a PE license. What in this requirement makes operations in the GoM safer? Does the BOEMRE plan to consider changing this requirement to expand the number of truly qualified people who can accurately assess this situation? What will eventually be the right standard for the certifying authority?

5. 30CFR250.420(c) requires that cement attain 500 psi compressive strength prior to drill out. What drives the CS requirement? It's not API RP 65-2.

6. 30CFR250.422(a) & (b) seem to be in conflict with the 500 psi compressive strength required by 30CFR250.420(c).
