

# PUBLIC SUBMISSION

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AD71 Renewable Energy Alternate Uses of Existing Facilities on the Outer Continental Shelf - Acquire a Lease Noncompetitively

**Comment On:** BOEM-2010-0045-0011

Renewable Energy Alternate Uses of Existing Facilities on Outer Continental Shelf: Acquire Lease Noncompetitively

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Comment from Richard Tuberville, Refired--offshore oil industry

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## General Comment

Offshore deepwater drilling carries inherent risk. However--The BP well was drilled and cased using current practices, methods and regulations.

BP disaster was a calamity of errors that are created by a profit first culture. When I was still offshore, certain company slogans were altered like "Get deeper cheaper--no matter what it cost.," Chevron 1980s.

Lets use some common sense. Use the people who work and make their lives in the industry. Very few engineers are onboard a vessel when it operates--their courage curve can be extreme when they do not have to lie down and sleep depending on their decisions to keep everyone safe.

Current technology exists to operate in deep water. IF you can keep a semi in 6000+ feet of water with computer driven thrusters we can drill a hole in the earth.

Current decision making has moved from rig experts on location to engineers in town. Yes they always say "your the person on location" but many times that same engineer will hang that person out to dry in a morning progress meeting because they chose the most prudent course of action instead of the safest or best alternative. There is always more than one way to proceed--but decisions made looking back at operations can be made perfectly. BP should never have placed seawater in a well with heavy weight mud. A rig should NEVER operate with a BOP that could have a defect.

These two actions could have prevented the BP disaster. SIMPLE in retrospect and made with perfect hindsight.

The decisions for these two actions were not made by experienced oilmen that were onboard the vessel. They probably came from the shore.

RETURN decision making authority to people onsite.