

London, Alexis

From: Champagne, Stanley M [champasm@bp.com]
Sent: Sunday, August 19, 2001 12:30 PM
To: MMS Rules Processing Team (E-mail)
Subject: MMS Proposed Rule: API Specifications for Offshore Cranes to be Incorporated

- > RPT,
- > I would like to comment on the proposed rules to incorporate; My
- > Name is Stan Champagne, currently working for bp in the gulf of Mexico
- > shelf , with Vastar/Arco heritage for the last 17 Yrs .
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- > * The proposed rule for requirements of ant-two-blocks for OCS
- > Facilities:
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- > I agree that this device is of a high Safety factor in preventing
- > misjudgment of a crane operator in creating an unsafe condition when
- > making lifts, I have witnessed several instances that this device
- > prevented an accident or worse a failure.
- >
- > My concerns are that coming form a vast field of 53 platforms that
- > we are responsible for is that Yes on all large facilities that this is
- > incorporated due to the Safety factor, usage of the crane, and the duty it
- > performs. In swapping over to BP policy all load lines will have this
- > device and we are just fixing to break that edge by fourth quarter this
- > year. My concern is over the small satellite structures primarily box
- > boom, with one winch, less than 20' boom and capacities not exceeding 7000
- > lbs it seems to be unfeasible to require these cranes of extremely low
- > usage to fall in this category.
- >
- > My input on what style is best effective, is the "winch override
- > circuit" to completely dump the pressure to the winch thus stopping the
- > raising of the load once a two-block is activated, this is the only true
- > fail safe design, the horn or light is just asking for complications.
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- > * The Proposed rule for increasing the record keeping from 2 years to
- > 4 years.
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- > Brilliant, yes this does make the crane file larger but past history
- > of a crane has proven to be a great predictive maintenance tool in
- > determining integrity on previous and future discrepancies. This may take
- > more that the 1 yr proposal to get all facilities up to the 4 yr
- > requirement as to not cause a conflict of "required in the book"
- > paperwork. The attached proposal to keep all records for the life of the
- > crane can be done but it must be remembered that in today's economic
- > forecast , archiving of paperwork always seems to be complicated of where
- > to keep the past history. I would not like to see the Crane file to be 8"
- > thick per crane.
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- > The aforementioned comments are solely my own from past experience
- > and my commitment to ensuring my company and all other companies in the
- > OCS safety operate cranes. If I can be of any further assistance please
- > contact me at any convenience. Thank you for allowing me to comment.
- > Please feel free to add my e-mail address to any future MMS distribution
- > list.
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- > <<...OLE_Obj...>>
- > Stan M. Champagne
- > Area Production Mechanic
- > Central West
- > 337-735-5759/5750
- > champasm@bp.com
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