

Proposed section	OOO comments	OOO rationale	MMS response
250.198	Incorporate correct editions of API RP 500 and API RP 505 into the regulations.	By FEDERAL REGISTER Notice dated January 4, 2000, MMS incorporated by reference API RP 500, Second Edition and API RP 505, First Edition. Proposed Rule should be modified to state such.	The final rule references the correct documents and editions.
250.401(b)	(b) Have a person onsite <i>24 hours per day during operations</i> that represents your interests and can fulfill your responsibilities.	Include 24 hours a day to provide clarity.	We did not add the 24 hours per day because it is unnecessary, but we did add during operations as suggested.
250.401(c)	(c) Ensure that the toolpusher or a member of the drilling crew maintains continuous surveillance of the rig floor from the beginning of drilling operations until the well is abandoned <i>or completed</i> , unless you have secured the well with blowout preventers (BOPs), <i>bridge plugs, cement plugs</i> , or packers.	Well may go from drilling to completion and not be abandoned. Additionally, bridge plugs and cement plugs are viable options for securing the well.	We made the suggested changes.
250.402	When and how must I secure a well? Whenever you interrupt <i>drilling</i> operations, you must install a downhole safety device, such as a cement plug, bridge plug, or packer. You must install the the device [as deep as possible] <i>at an appropriate depth</i> within a properly cemented casing string <i>or liner</i> .	The use of the phrase "as deep as possible" infers that the device should be set at the bottom of the hole. By changing "as deep as possible" to "an appropriate depth" allows the operator flexibility to choose appropriate setting depths.	We made the suggested changes.
250.402(a)	(a) [Among] The events that may cause you to [interrupt] <i>temporarily suspend drilling operations or</i> .	The proposed text regarding what types of events require securing of well downhole is vague and open-ended. Therefore, we recommend the word "among" in paragraph (a) be deleted, and the remainder of the paragraph be amended as recommended to detail the specific type of events, which is consistent with existing requirements.	We did not make the suggested change because there may be other events that cause you to interrupt drilling operations. The wording as suggested would limit the events that would require the installation of a downhole safety device.
250.403(c)	Requested clarity for paragraph (c) When you move a drilling rig or related equipment on a platform. You must shut in each well below the surface and at the wellhead, unless otherwise approved by the District Supervisor.	The language proposed is very vague. It appears that a subsurface shut-in is only required to move a rig while located on a platform (<i>i.e.</i> from well to well) and does not address rigging-up and rigging-down. Also applicability to MODUs is unclear (movement of cantilever jack-ups and floaters).	We revised the wording to clearly state when you must shut in each well below the surface and at the wellhead. The final wording is contained in § 250.406.
250.410(b)(3)	Form MMS-123S may require modifications to include additional information requirements. OOC requests that it be allowed to review and provide comments to the MMS, if the form is modified.	We assume that Form MMS-123S will be modified to contain new information requirements. Therefore, we believe it would be beneficial to both industry and the MMS to allow OOC to review the new form.	As previously discussed, MMS revised this form and the other subpart D drilling and well forms through a separate process. We provided an opportunity to comment on the revised forms and note that OOC did comment.
250.413(h)	(h) delete	We recommend that Line (h) be deleted. It is not clear how is this additional summary is to be submitted. (<i>i.e.</i> Is it to be included in Form MMS 123S or is it a narrative summary to part of the ADP, or is it a separate submittal?) The language as proposed is unclear, and OOC is not sure of the intent, or the purpose of this additional reporting requirement. Additionally, the summary report of the shallow hazards site survey will have been previously submitted with the EP/DOCD under which the well will be drilled.	The revised paragraph (h) now says that your well drilling design criteria must include a summary report of the shallow hazards site survey if it was not previously submitted.