

Proposed section	OOO comments	OOO rationale	MMS response
250.424(a)	(a) You must pressure test each string of casing to 70 percent of its minimum internal yield <i>or as otherwise approved by the District Supervisor</i> . This testing requirement does not apply to drive or structural casing. When a diverter is installed on conductor casing, you must test the casing to a minimum of 200 psi. [The District Supervisor may approve or require other casing test pressures.]	There is more than one currently approved method for calculating casing test pressure. We recommend that the alternative test methods be included in the new requirements, or allow the District Supervisor the discretion to approve alternative methods.	We chose not to list the alternative methods for calculating casing test pressure. You should address alternative test pressures or methods in your APD (see § 250.423).
250.431(a)	(a) Use diverter spool outlets and diverter lines that have [an internal diameter] <i>a nominal diameter</i> of at least 10 inches for surface wellhead configurations and at least 12 inches for floating drilling operations.	API line pipe is normally used for diverter lines. Line pipe is different than casing. The nominal size of line pipe normally refers to the OD (for larger sizes).	We made the suggested changes.
250.434	(f) After drilling is completed, [retain all the records listed in this section for 2 years at the facility, at the lessee's field office nearest to the facility, or at another location conveniently available to the District Supervisor.] <i>the lessee must retain all the records listed in this section for 2 years and make them available at the District Supervisor's request.</i>	To require the lessee to maintain detailed drilling records at the facility or at the nearest field location after drilling is completed is unreasonable, and places an unnecessary recordkeeping burden on the operator. We do maintain these records; however, they are typically maintained in a central record center. The need to maintain test results in the field after the drill operations are completed is unclear. Should the need to review these records arise, they can be supplied at that time.	We deleted paragraph (f) and moved the recordkeeping requirements to §§ 250.466 and 250.467. Section 250.466 requires you to keep drilling records onsite during drilling operations. After completion of drilling activities, you may keep all records at a location of your choice. A table in § 250.467 gives the time periods for keeping all records.
250.440	You must design, install, maintain, test and use the BOP system and system components to ensure well control * * *.	Include test in the proposed text to be complete and consistent with the existing requirements.	We made the suggested change.
250.441(b)	(b) Delete	We strongly recommend that this requirement be eliminated. We have reviewed the description of the incidents used by the MMS to justify the proposed requirement to install blind-shear rams in all BOP stacks and disagree with the conclusion that they support the need to require the installation of blind-shear rams. Furthermore, a 13 $\frac{5}{8}$ inch blind-shear rams would cost the drilling contractor an estimated \$82,000 plus transportation and installation costs. The total estimated cost imposed by this requirement would be \$150,000 per stack.	MMS did not make the suggested change. See response to comments in the previous part of the preamble. As for the \$150,000 cost per stack cited by OOC, we have used a cost of \$175,000 in our evaluation of impacts.
250.442(b)	(b) You must install a subsea accumulator closing unit, <i>or equivalent systems</i> to provide fast closure of the BOP components and to operate all critical functions in case of a loss of the power fluid connection to the surface. The [subsea] accumulator must meet or exceed the provisions of Section 13.3, Accumulator Volumetric Capacity, in API RP 53, Recommended Practice for Blowout Prevention Equipment Systems for Drilling Wells. The District Supervisor may approve a suitable alternative method.	Many BOP stacks on floating drilling rigs currently in operation do not meet the proposed requirement to install a subsea accumulator. In lieu of subsea accumulators, the inclusion of redundant power/control lines provides the equivalent protection necessary. Therefore, we recommend the inclusion of the statement "or equivalent system" to the proposed language.	Our changes to this paragraph follow the suggested changes (see § 250.442(c)).