

Comments 1- 9 are general comments on Proposed rule 30 CFR Part 250 Subpart K
Regulation Identifier Number 1010-AD12

<u>Comment 1:</u>	30 CFR 250 Subpart K 250.1163 (a)
Existing Wording	If your facility processes more than an average of 2,000 BOPD [MONTH AND YEAR IN WHICH FINAL RULE IS PUBLISHED], you must install flare/vent meters within 120 days after [THE MONTH AND YEAR IN WHICH THE FINAL RULE IS PUBLISHED]. If your facility processes more than and average of 2,000 BOPD during a calendar month after [month and year in which final rule is published], you must install flare/vent meters within 90 days after the end of the month in which the average amount of oil processed exceeds 2,000 BOPD.
Requested Change	If your facility processes more than an average of 10,000 BOPD [MONTH AND YEAR IN WHICH FINAL RULE IS PUBLISHED], you must install flare/vent meters within 180 days after [THE MONTH AND YEAR IN WHICH THE FINAL RULE IS PUBLISHED]. If your facility processes more than and average of 10,000 BOPD during a calendar month after [month and year in which final rule is published], you must install flare/vent meters within 180 days after the end of the month in which the average amount of oil processed exceeds 10,000 BOPD.
Rational & Comments	<p>Installing flare/vent meters – cost, recordkeeping burden, technical obstacles, SAFETY concerns – if meters would cause a restriction. Cost estimate of \$77,000 per meter...with no burden of hours. The cost estimate does not include the cost to tie the meters to the data collection system. Also, calibration and maintenance costs associated with the meter would drive this cost estimate much high. It is normal practice to have separate low and high pressure vent/flare lines. Current proposal would require a separate meter for each line, thus duplication costs.</p> <p>In summary, costs will be much higher than estimated \$77,000, therefore a huge burden for smaller facilities. So, we recommend increase the meter requirement to facilities with average throughput of 10,000 BOPD or more.</p> <p>We believe that flare/vent emissions for smaller facilities (less than 10,000 BOPD) can be estimated using engineering calculations with reasonable accuracy without a meter. Smaller facilities tend to have wide range of flow rates thus make it difficult to size a meter.</p> <p>Increasing the time allowed for compliance is necessary due for technical reasons &/or due to the availability of meters. Additional time may be required for engineering and design of the meter, locating vendors, shipping, offshore labor availability issues.</p> <p>Not practical for some smaller platforms: For example – ultrasonic meters transducers need 20 pipe diameters upstream and 10 diameters downstream straight pipe for accurate measurement – this could potentially a problem with limited space on an offshore platform. Problem will be multiplied when multiple transducers are required to cover the expected range of flow rates.</p>

<u>Comment 2:</u>	250.1163 (1)
Existing Wording	The flare/vent meters must measure all flared and vented gas within 2 percent accuracy.
Requested Change	The flare/vent meters must measure all flared and vented gas 15 percent accuracy.
Rational & Comments	We anticipate technical problems with attaining or demonstrating 2 percent accuracy. Especially at low flow rates, this accuracy will be very difficult to achieve. We strongly suggest using one transducer (meter) to capture the major (high) flow events and continue to estimate by engineering calculation for low flow vents.

<u>Comment 3:</u>	250.1163 (a)(2)
Existing Wording	You must calibrate the meters regularly, in accordance with the manufacture's recommendation, or at least once every 6 months, whichever is shorter.
Requested Change	You must calibrate the meters regularly, in accordance with the manufacture's recommendation, or at least once every 6 months, whichever is shorter. This requirement is waived for emergency only vent/flares.
Rational & Comments	What if we do not have a flow when we schedule for calibration? Most our flares/venting is done during upset or emergency situations. Flare pilot must be kept all the time hence inert gases such as nitrogen cannot be used as it will pose safety issue by extinguishing pilot flame

<u>Comment 4:</u>	250.1163 (b)
Existing Wording	You must report all hydrocarbons produced from a well completion, including all gas flared, gas vented, and liquid hydrocarbons burned to Minerals Revenue Management...
Requested Change	
Rational & Comments	OK

<u>Comment 5:</u>	250.1163 (b)(1)
Existing Wording	You must report the amount of gas flared and the amount of gas vented separately.
Requested Change	
Rational & Comments	OK

<u>Comment 6:</u>	250.1163 (b)(2)
Existing Wording	You must classify and report gas used to operate equipment on the facility... as lease gas
Requested Change	
Rational & Comments	OK

<u>Comment 7:</u>	250.1163 (b)(3)
Existing Wording	You must report the amount of gas flared and vented at each facility on a lease or unit basis.
Requested Change	
Rational & Comments	OK

<u>Comment 8:</u>	250.1163 (c) (d) p 9888
Existing Wording	(6 years is in the table 1163 (c) (d) p 9888...
Requested Change	2 years
Rational & Comments	We prefer to see the relaxed retention time due to cost of holding these records.

Comments 9-14 are in response to MMS request to comment on the following questions.
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 Regulation Identifier Number 1010-AD12

<u>Comment 10:</u>	
Question 1.	Are these regulations well organized and easy to read?
Marathon response	Yes.

<u>Comment 11:</u>	
Question 2.	Is the submittal table useful?
Marathon response	

<u>Comment 12:</u>	
Question 3.	Is the 2,000 BOPD requirement for installing flare/vent meters reasonable? Are the cost estimates accurate?
Marathon response	No, see comments on first...

<u>Comment 13:</u>	
Question 4.	Would the requirement to install flare/vent meters pose a safety hazard by restricting the flow during emergency facility blowdowns, or are accurate meters (such as ultrasonic meters) available that do not impede gas flow?
Marathon response	<p>In order to avoid the safety hazard we are limited to the non-intrusive ultrasonic meters. Due to length of pipe needed locations of meters may be in areas that are not easily accessible, thus additional working platform areas will be needed which increases cost.</p> <p>Flares are an important part of our offshore safety system. We have concerns about installing any equipment that could reduce the effectiveness. The ultrasonics may not have the turndown to span the full range of flaring activities and these ultrasonic meters have problems with space required and accuracy...</p>

<u>Comment 14:</u>	
Question 5.	Should MMS require operators to flare natural gas instead of venting it, under approved flaring and venting conditions? This question is based on a recommendation from the GAO report on flaring and venting natural gas,

	<p>and reflects concerns about the amount of greenhouse gas that is released into the environment by venting. MMS is studying this recommendation before proposing any regulatory change. We would like comments on this issue, including comments related to additional costs, environmental impacts, and conditions or situations where flaring may not be advisable.</p>
Marathon response	<p>Safety concerns In some circumstances, a existing platform may need to be completely redesigned to allow for safe flaring... costs to modify and buy flare tip, sufficient distance therefore radiation effects</p>