

From: Carl M. Carline [CCarline@MaritechResources.com]

Sent: Tuesday, April 24, 2007 10:37 AM

To: Rules Comments

Subject: MMS Proposed Rewrite of OCS Oil and Gas production requirements 1010-AD1

The rewrite of venting and flaring requiring meters to measure flaring or venting of gas on platforms that produce more than 2000 BBLs oil per day would be unnecessary if MMS required pulling samples of product going into the vessels that vent and use this calculated volume to determine if recovery of this gas would be required.

A threshold of amount of gas vented per day based on volumes calculated on the bases of liquid gravity and amount of flash due to pressure drop would be sufficient instead of the cost of mandatory installing meters.

Most vent gas on a platform comes from the flash into the heater treater and then into the oil holding tank before being shipped by LACT system. I have seen some platforms producing 2000 plus low gravity oil per day and vent gas was minimal since they were dumping from a 40# system to the heater treater.

On the other hand if there are HP systems dumping high gravity liquid into vessels that vent then you would have a volume that would probably require a recovery system.

I'm more inclined to a set MCF volume per day vented calculated by test mentioned than having a mandatory metering system which would be costly to install and maintain.

Carl Carline

Measurement Supervisor

Maritech Resources, Inc.

Phone: (337) 981-2332

Fax: (337) 981-2338

Cell: (337) 288-4150