

Global Marine Drilling Company

100 ASMA BLVD. SUITE 260 LAFAYETTE, LA 70508
PH. (318) 237-9540
FAX (318) 269-7051

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August 25, 1997

Department of the Interior
Minerals Management Service
Mail Stop 4700, 381 Elden Street
Herndon, Virginia 20170-4817
Attn: Rules Processing Team

Re: **30 CFR Part 250**
BOP Testing Requirements for Drilling & Completion Operations

Gentlemen:

Please find below two (2) comments regarding the MMS's proposed Amended 30 CFR Part 250 Subparts D & E:

1. General

The BOP testing regulations were amended for drilling and completion operations only, not workover operations. Most workover operations, other than P&As, also include a completion or re-completion. Would the amended BOP testing regulations apply to the completion phase of a workover? What drives the determination as to whether or not the amended regulations apply ... permit type, well operations, rig type ???

2. BOP Test Pressures

GMDC supports the use of each well's maximum anticipated surface pressures (MASP) for determining the required BOP test pressure as opposed to the rated working pressure of the BOP components. The addition of the MASP requirements to the final rule would not only make it more consistent with current industry practices, but also reduce the undo stress, wear, and tear exerted on each BOP component thereby improving component reliability and reducing fatigue failures. A conservative method of determining a well's MASP is recommended.

GMDC concurs with your proposed rule changes and submits the above comments for your consideration prior to issuing the final rule.



Lynn Coleman
Vice President, GOM Operations

SDC

cc: Ralph Linenberger

