

Rules Comments

From: Collazzi, Ed [Ed_Collazzi@envircon.state.ak.us]
Sent: Tuesday, December 04, 2001 7:35 PM
To: 'rules.comments@mms.gov'
Cc: Dietrick, Larry; Harvey, Susan; Hahn, Brad
Subject: Comments re: 1010-AC83, SCP

TO: Rules Processing Team
RE: Notice of Proposed Rulemaking, "Oil and Gas and Sulphur Operations in the Outer Continental Shelf-- Procedures for Dealing With Sustained Casing Pressure" (RIN 1010-AC83)

The Alaska Department of Environmental Conservation respectfully submits the following comments on the above-referenced NPRM.

Currently there is only one operation in Alaska (Northstar, an offshore North Slope facility) that could potentially be subject to these requirements.

The Department supports the proposed rulemaking as contributing to proper well maintenance and abandonment. The incorporation of current procedures into regulation will help to clarify and make consistent their practice by all regulated operators.

The Department notes that provisions for dealing with an emergency situation are not specifically addressed. Outlining an alternative process for dealing with an immediate threat should be considered, as the process for gaining approval of a departure request described in the proposed rules may take more time than is prudent in such cases.

Thank you for the opportunity to comment.

Edmund J. Collazzi
Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
410 Willoughby Ave. Suite 303
Juneau, Alaska 99801-1795
Phone: (907) 465-5229
Fax: (907) 465-5262