



OCT 4 2000

OFFSHORE OPERATORS COMMITTEE

October 3, 2000

Minerals Management Service
Rules and Processing Team
381 Elden Street
Mail Stop 4024
Herndon, Va. 20170-4817

Subject: Proposed Rule, Subpart Q- Decommissioning Requirements

Dear Sir:

The Offshore Operators Committee (OOC) appreciates the opportunity to comment on the subject proposed rule to amend regulations regarding decommissioning activities. The OOC supports Mineral Management Services (MMS) initiatives to update the applicable standards, practices and policies to eliminate confusion and facilitate better compliance, and willingness to consider recommendations from the OOC in this process. This cooperation between industry and government will help ensure that sound policies are developed.

OOC is an organization of some 70 producing companies who conduct essentially all of the OCS oil and gas exploration and production activities in the Gulf of Mexico. Comments made on behalf of OOC are submitted without prejudice to any member's right to have or express different or opposing views.

The attached comments are a compilation of comments developed by several companies participating in the review of this proposed rule. The attached document contains recommended wording changes to the proposed in the text, along with our rationale for the proposed changes. Additionally, we have included requests for clarification in some areas.

OOC is concerned that this proposed rule contains new and controversial requirements regarding the tagging of cement plugs, and the height restriction of 10 feet above the seafloor for subsea domes. These new requirements could potentially increase cost and present operational difficulties without a commensurate benefit to safety or protection of the environment.

Furthermore, we have provided recommended changes to the proposed rule where positive economic impacts can be realized in the areas of site clearance requirements, "clearwater" above obstruction limits, and deepwater abandonment and site reclamation

without reducing safety, environmental protection or effecting other uses of the seafloor. These recommendations are supported by data collected by our member companies, as well as research performed by the Louisiana Department of Wildlife and Fisheries.

These same recommendations have been previously addressed in other comments submitted to the MMS in response to requests for comments regarding the effectiveness of OCS operating rules.

OOC appreciates your consideration of these comments. Please feel free to contact me or Mr. Steve Brooks (504-561-4753); (sbrooks@upstream.xomcorp.com) if you have any questions or wish to discuss in more detail.

Respectfully submitted,

A handwritten signature in black ink that reads "Allen Verret, PE". The signature is written in a cursive style.

Allen Verret, PE
Executive Director
Offshore Operators Committee

TSB:hk

Attachments

RECOMMENDED REVISION TO PROPOSED 30 CFR 250 SUBPART Q

Proposed Section Number	MMS Proposed Text	Proposed Language/Comments	Rationale
General	Regulatory Flexibility (RF) Act		
250.1700	<p>What do the terms "decommissioning" and "obstructions" mean?</p> <p>(b) Obstructions are objects that were used in oil, gas, or sulphur operations and that, if left behind or abandoned in place, would hinder other users of the OCS. Obstructions include, but are not limited to, wellheads, casing stubs, mud line suspensions, subsea trees, jumper assemblies, umbilicals, manifolds, termination skids, production and export risers, platforms, templates, pilings, pipeline valves, and power cables (in the Pacific OCS Region).</p>	<p>The costs to perform trawling operations represented in Table 2 have been grossly underestimated. In up to 250-ft. water depths, costs for trawling operations can approach \$50,000 to \$60,000 per location as opposed to \$3,000 listed in Table 2.</p> <p>What do the terms "decommissioning" and "obstructions" mean?</p> <p>(b) Obstructions are objects that were used in oil, gas, or sulphur operations and that, if left behind or abandoned in place, would hinder other users of the OCS. Obstructions include, but are not limited to, wellheads, casing stubs, mud line suspensions, subsea trees, jumper assemblies, umbilicals, manifolds, termination skids, production and export risers, platforms, templates, pilings, pipeline valves, and power cables.</p>	<p>Remove the reference . . . (in the Pacific OCS region). The GOM OCS Region also has power cables.</p>
250.1702	<p>When do I accrue decommissioning obligations?</p> <p>You accrue the decommissioning obligations when you do any of the following:</p> <p>(d) Become a lessee or the owner of operating rights of a lease on which there is a well that has not been plugged according to this subpart, a platform or other facility, or an obstruction; or</p>	<p>(d) Become a lessee or the owner of operating rights of a lease on which there is a well that has not been plugged according to this subpart, a platform or other facility, or an obstruction unless sales contract between the Operating Parties dictates otherwise.</p>	<p>Transfer of existing wells, equipment, etc. is often a part of sales agreements.</p>
250.1704	<p>When must I submit decommissioning applications?</p> <p>You must submit decommissioning applications according to the following table.</p>	<p>(a) . . . at least 1 years before production is <i>projected</i> to cease.</p>	<p>Clarity. The proposed language is consistent with NTL 99-P05. Additionally, it is recommended that the two-year period be reduced to one year, since one year has always been</p>

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	(a) In the Pacific OCS Region or Alaska OCS Region, submit the application to the Regional Supervisor at least 2 years before production ceases		appropriate for processing a decommissioning application.
250.1707	<p>When may MMS order me to permanently plug a well? MMS may order you to permanently plug a well if that well:</p> <p>...</p> <p>(b) Is not useful for lease operations and is not capable of profitable oil, gas, or sulfur production.</p>	<p>(b) If the well is the last producing well on a lease, and not useful for further and is not capable of profitable oil, gas, or sulfur production.</p>	<p>The recommended change eliminates the unnecessary preliminary abandonment of wells contained within a producing lease, field or platform.</p>
250.1709	<p>What information must I include to plug wells?</p> <p>...</p> <p>(a)(2) Applicable well logs and test data:</p> <p>...</p> <p>(a)(6)(ii) All perforated intervals;</p>	<p>(a)(2) When available, applicable well logs and test data.</p> <p>(a)(6)(ii) All perforated intervals that have not been plugged.</p>	<p>The logs may not be available at the time of the submittal of From MIMS 124.</p> <p>Eliminates the need to re-submit any details regarding other intervals in the well that were previously abandoned with the appropriate approvals.</p>
250.1710	<p>How must I permanently plug wells? You must permanently plug wells according to the table in this section. The District Supervisor may require additional well plugs as necessary.</p> <p>(a) Zones with open hole. Cement plugs from at least 100' below the bottom to 100' above the top of oil, gas and fresh-water zones to isolate fluids in the strata.</p> <p>(b)(c)(d)(f) ... plugs....</p>	<p>(a) Zones with open hole. Cement plug(s) from at least 100' below the bottom to 100' above the top of oil, gas and fresh-water zones to isolate fluids in the strata.</p> <p>(b)(c)(d)(f) ... plug(s)...</p>	<p>Use of the term "plugs" (plural) implies that multiple cement plugs must be set to meet the requirement. The recommend revision would provide from the use either multiple plugs or a single plug.</p> <p>Same rationale as above.</p>

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	(d)(2) Cement retainers or permanent bridge plugs at least 50' to 100' above the stub and 100' below	(d)(2) Cement retainers or bridge plugs at least 50' to 100' above the stub and 100' below ...	Consistency. Remove the word permanent, as all other references to "bridge plugs" do not specify the type of bridge plug.
	(h) Cement Displacement Plugs. Tags to verify the position of each plug.	Delete this section.	This is a new unnecessary requirement. Since section 250.1710 (k) already addresses testing of plugs placed by displacement. Furthermore, it is not common practice to tag all cement plugs. For example, if intermediate casing is set at 10,000', open hole below this casing string to 12,000' and logged hydrocarbons at 11,200', an open hole plug would be spotted across the hydrocarbon zone (min. 100' above and below). Then a cement retainer would be set within the bottom 100' of the inter., establish injection and squeeze cement below the retainer, release from the retainer and dump min. of 50' on top of the retainer.
	(i)(2) Cement plugs set before freezing and have a low heat of hydration	(i)(2) Cement plugs <i>designed to set</i> before freezing and have a low heat of	To tag the open hole plug, would require a minimum of 6 to 8 hours of rig time waiting on the cement to set prior to tagging. If the plug has not set, the end of drillpipe could become plugged and require either pulling a wet string or perforating the drillpipe in order to circulate prior to tripping. Depending on the type rig and waiting time the cost impact to tag a cement plug could be \$15k to \$20k per plug.

Clarity

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250.1711	<p>(l) Fluid in the intervals between the plugs dense enough to exert a hydrostatic pressure that is greater than the respective formation pressures.</p> <p>What are the requirements if I temporarily plug a well that I plan to re-enter? You must do the following: ... (c) Set a retrievable or a permanent-type bridge plug or a cement plug at least 100 feet long in the casing within the first 200 feet below the mud line;</p>	<p>hydration.</p> <p>(l) Fluid in the intervals between the plugs dense enough to exert a hydrostatic pressure that is greater than the respective formation pressures at the time of abandonment.</p> <p>(c) Set a retrievable or permanent-type bridge plug or a cement plug at least 100' long in the inter-most casing. The top of the bridge plug or cement plug shall be no greater than 1000' below the mud line. Waivers to the requirement for surface plugs for sub-sea wells will be considered on a case-by-case basis.</p>	<p>Shallow plugs on wells intended for re-entry can be dangerous. Examples of hazards that can be experienced when attempting to remove a shallow plug are: 1). Bottom hole assemblies will be opposite the BOP's while drilling the surface plug out. This scenario would most likely prevent effective/safe well shut-in and may limit one to the use of the annular preventors only (reduced pressure capability over rams) in a high pressure situation. It would also severely impede the ability to safely strip HMDP/collars/subs/stabilizers through BOP's without significant risk of damage to sealing elements. Most importantly, it adds complexity to the stripping operation and creates a high potential condition in which significant volumes of gas could get into the drilling riser in the case of floating operations or escape to atmosphere in the case of surface systems. This contributes to concern for safety of personnel and environment. 2). Drill string weight may be insufficient to permit stripping in the event of a kick and shut in. 3). Gas trapped below a shallow plug may provide insufficient time to safely</p>

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250.1711	<p>What are the requirements if I temporarily plug a well that I plan to re-enter? You must do the following:</p> <p>...</p> <p>(g) Except in deep water areas or other locations where there are no commercial fishing activities, protect subsea wellheads, casing stubs, mud line suspensions, or other obstructions remaining above the seafloor to allow fishing gear to pass over the structure without damage to the structure or fishing gear by using one of the following or other procedure, as approved by the Regional or District Supervisor:</p> <p>(1) A caisson designed according to Sec. 250.906 and equipped with aids to navigation;</p> <p>(2) A jacket designed according to Sec. 250.906 and equipped with aids to navigation; or</p> <p>(3) A subsea dome that does not extend more than 10 feet above the seafloor and over which you trawl when you install it and inspect annually.</p>	<p>(g) Except areas where a minimum distance of greater than 200 ft from the upper most part of the subsea obstruction to the water's surface exist or other locations . . . one of the following or other procedure, as approved by the District Supervisor:</p>	<p>shut the well in before the gas reaches the surface.</p> <p>4). Gas trapped below a surface plug from a low volume gas leak may reach sufficient pressure to rupture the casing below the plug if the migrating gas is unable to expand.</p> <p>Effective abandonment downhole makes the surface plug unnecessary.</p> <p>Need to define water depth when subsea dome covers are needed. We recommend 200 ft. of "clearwater" above the subsea equipment. It is unnecessary to go to the large expense of covering a subsea stub that would not impede commercial fishing or other OCS activities. The USCG policy regarding the marking of artificial submerged structures states in part that "these structures with less than 85 feet of water clearance over the top of the structure require marking for the protection of navigation and commercial fishing gear. This will be done with one lighted lateral system buoy. Structures which terminate between 85 and 200 feet beneath the surface of the water must be marked for the protection of commercial fishing nets and other fishing devices. The markings will be white with orange bands special purpose buoy of such construction as not to be a hazard itself." This policy further states that "markings are not required for submerged structures having more than 200 feet of water over them.</p> <p>Additionally, eliminate the reference to</p>

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250.1713	<p>When might MMS consider approving an alternate removal depth? MMS may allow you to depart from the requirement for removing subsea wellheads and casings to 15 feet below the mud line when:</p> <p>(a) The wellheads and casings would not become hazards to other users of the seafloor or area and geotechnical and other information you provide demonstrates that erosional processes capable of exposing the obstructions are not expected; or</p> <p>(b) The water depth is greater than 800 meters.</p>	<p>(3) A subsea dome that does not extend more than 10 feet above the seafloor and over which you trawl when you install it and inspect annually unless the District Supervisor approves an alternate height from the seafloor due to different well conditions that may exist.</p> <p>(a) Clarity requested.</p> <p>(b) The water depth is greater than 1000 feet.</p> <p>(c) Seafloor sediment stability poses</p>	<p>either the District Supervisor or Regional Supervisor for granting approval.</p> <p>By allowing installations greater than 10 feet above the seafloor, on a case-by-case basis would provide flexibility for certain well scenarios. OOC believes that 10 feet above the seafloor to be an arbitrary figure with no engineering or maritime justification. In fact, the majority of current installations are greater than 10 feet above the seafloor. If the site is consistent with other OCS operations such as navigation and fishing operations, the height above the seafloor, within reason, should not matter. Therefore by trawling initially and inspecting annually would verify consistency.</p> <p>It is not clear how to determine and/or prove that a particular obstruction constitutes a hazard.</p> <p>1000 feet of water depth should be applied which puts you beyond the Shelf areas of the GOM and is consistent with the DWOP depth for deepwater projects. The use of feet rather than meters to be consistent.</p> <p>When using divers, the 15 feet below</p>

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250.1714	<p>What must I do to clear a well site of obstructions?</p> <p>For each well site you must verify clearance and certify your verification.</p> <p>(a) For wells, you must verify site clearance by one or more of the following methods as approved by the District Supervisor:</p> <p>(1) Drag a trawl in a grid-like pattern across a 300-foot-radius circle centered on an exploration or delineation well drilled with a Mobile Offshore Drilling Unit;</p> <p>(2) Scan across the location with a sonar search of at least 500 KHz frequency; or</p> <p>(3) Use other radii or methods based on particular site conditions.</p> <p>(b) You must certify that the area was cleared of all obstructions and submit the following information on form MMS-124 within 30 days after you complete the verification activities:</p> <p>(1) The date the work was performed;</p> <p>(2) The extent of the area surveyed around the location; and</p> <p>(3) The survey method.</p>	<p>safety concerns.</p> <p>For each well site in less than 200 feet of water you must verify clearance and certify your verification.</p> <p>(a) For wells, you must verify site clearance by one or more of the following methods as approved by the District Supervisor:</p> <p>(1) Drag a trawl in a grid-like pattern across a 200-foot-radius circle centered on an exploration or delineation well drilled with a Mobile Offshore Drilling Unit;</p> <p>(ADDITION) (a) (4) Utilize Diver or ROV inspection and video documentation.</p>	<p>mudline requirement can be difficult to obtain in areas with soft sediments and cave-ins have lead to diver injuries.</p> <p>As presented by OOC in a letter to the GOM Regional Director Dated a September 22, 1992, data from the Louisiana department of Wildlife and Fisheries indicates that over 97% of shrimp fisher total catch occurs in less than 200 feet of water. Furthermore, analysis from 10 caisson clearance operations indicates recovery rate beyond a 200-foot radius has reached background levels.</p> <p>Many drilling rigs are now equipped with ROVs which provides for an efficient reliable inspection of the well site prior to rig departure.</p> <p>Will NTL 98-26 be rescinded or revised due to the new regulations regarding well abandonments? If so, the new rule is missing many details found in the NTL including: (1) The requirement that a procedural plan be submitted to the Regional Supervisor, (2) The requirement to notify the District Supervisor 48 Hours prior to conducting well clearance survey, and (3) the detailed trawling grid patterns.</p>

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2501715	<p>What must I do to clear a facility of obstructions? To clear a facility of obstructions, you must comply with the Regional Supervisor's clearance requirements and, at minimum:</p> <p>(a) Clear obstructions from: (1) A 1,320-foot-radius circle centered on the geometric center of the facility; or (2) A 600-foot-radius circle centered on a single well caisson and well protectors. (b) In less than a 300-foot water depth, trawl 100 percent of the limits described in paragraph (a) of this section in two directions, and in greater than a 300-foot water depth, scan across the location with a sonar of at least 500 KHz frequency;</p>	Request for Clarity.	<p>Redundancy in regulatory documents should be minimized if at all possible. What are the requirements for site clearance?</p>
250.1716	<p>What must I do to clear a buried pipeline of obstructions? For buried active pipelines, you must trawl without any restrictions; however, you must contact the pipeline owner or operator to determine the condition of the pipelines to be trawled.</p>	Request for clarity.	<p>As presented by OOC in a letter to the GOM Regional Director Dated September 22, 1992, data from the Louisiana department of Wildlife and Fisheries indicates that over 97% of shrimp fisher total catch occurs in less than 200 feet of water. Furthermore, analysis from 10 caisson clearance operations indicates recovery rate beyond a 200-foot radius has reached background levels. Analysis of 9 platform clearance operations indicates recovery rate beyond 800-foot radius has reached background levels.</p>
250.1717	<p>What must I do to clear a trawling operation of obstructions? For trawling operations for both facilities and pipelines, you must do all of the following to clear obstructions:</p>		<p>Need clarification of "active" pipelines. Additionally, NTL 98-26 clarifies the requirements for abandoned pipelines and for unburied active pipelines. No mention of these occurs in the proposed regulation. We recommend that they be addressed in the regulations or rescind NTL 98-26.</p>

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	<p>..</p> <p>(g) Ensure that the company performing the location clearance sends a letter to the Regional Supervisor certifying it cleared the location of all obstructions. The company must send the letter within 30 days after site clearance is verified and must include the following information:</p> <p>(1) The date the work was performed and the vessel involved;</p> <p>(2) The extent of the area surveyed;</p> <p>(3) The survey method used;</p> <p>(4) The results of the survey, including a list of any debris removed or statement from the trawling contractor that no objects were recovered;</p> <p>(5) A post-trawling job plot or map showing trawled area; and</p> <p>(6) An additional letter signed by an authorized lessee/operator company representative stating that they witnessed the trawling survey.</p>	<p>(g) Verify location clearance by sending a letter to the Regional Supervisor certifying the location is clear of all obstructions and the lessee/operator witnessed the trawling survey, if applicable. Include in this letter a letter from the company performing the location clearance certifying the site has been cleared to the Regional Supervisor within 30 days after site clearance is verified and must include the following information:</p> <p>...</p> <p>(5) A post-trawling job plot or map showing trawled area.</p> <p>Remove line 6.</p>	<p>The lessee should send the clearance report to the Regional Supervisor along with the completion report to ensure that all the right paperwork is submitted to the MMS on time.</p>
250.1718	<p>What are the requirements for removing platforms and subsea facilities?</p> <p>...</p> <p>(d) You must remove subsea trees, jumper assemblies, umbilicals, manifolds, and termination skids in conjunction with well plugging activities;</p> <p>(e) You must flush and remove all production and export risers with seawater from the seabed; and</p> <p>(f) Within 1 year after lease termination or right-of-way relinquishment, you must remove all platforms and subsea facilities, including those listed in paragraphs (c) and (d) of this section, according to the</p>	<p>(Addition) (f)(3) Approval from the Regional Supervisor to abandon in place subsea equipment in greater than 1000 feet of water.</p> <p>(Addition) (f)(4) A waiver to defer</p>	<p>Past Deepwater Operating Plans (DWOPs) have requested that umbilicals and flowlines would not be removed at the end of the project life, but flushed and abandoned in place. The MMS has approved DWOPs with such language on prior subsea projects.</p> <p>These deepwater structures pose no hazard or obstruction in deepwater depths greater than 1000 ft and serve to enhance the environment for sealife without fishing interference in these water depths. The abandonment in place of subsea equipment (i.e. manifolds, termination skids) has also been</p>

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	<p>approved final platform removal application. This paragraph does not apply if you receive either:</p> <p>(1) Approval to maintain the platform and subsea facilities to conduct other operations; or</p> <p>(2) A waiver to conserve the structure as an artificial reef.</p>	<p>removal as a part of a joint industry program to remove multiple platforms of facilities.</p>	<p>approved in DWOP submittals by the MMS.</p> <p>The execution of a joint industry program to remove multiple platforms or facilities (e.g. SWARS Program in the Pacific Region) may require that platforms remain for longer than one year after lease termination, but this may also be the preferred alternative due to lower environmental impacts.</p> <p>OOC recommends that language be inserted to include the requirements of the removal application for subsea equipment.</p>
250.1719	<p>What information must I include in my final platform removal application?</p> <p>You must submit three copies of the final platform removal application if you are proposing to use explosives or two copies if you are not using explosives to the Regional Supervisor. Include all of the following information:</p>	<p>What information must I include in my final platform, or subsea equipment removal application?</p> <p>You must submit three copies of the final platform, or subsea equipment removal application if you are proposing to use explosives or two copies if you are not using explosives to the Regional Supervisor. Include all of the following information, if applicable:</p>	<p>What is the rationale for the 800-meter departure possibility? OOC suggests 1000' of water depth should be applied which puts you beyond the Shelf areas of the GOM. Why is the depth expressed in meters when other depths in this subpart are expressed in feet?</p>
250.1721	<p>When might MMS consider approving an alternate removal depth?</p> <p>The Regional Supervisor may approve an alternate removal depth if:</p> <p>(a) The remaining structure or other facility would not become a hazard to other users of the seafloor or area and geotechnical and other information you provide demonstrates that erosional processes capable of exposing the obstructions are not expected; or</p> <p>(b) The water depth is greater than 800 meters.</p>	<p>b) The water depth is greater than 1000 feet.</p>	
250.1722	<p>What is MMS' policy on converting a platform or other facility to an artificial reef or other use?</p>	<p>MMS would allow the re-use of obsolete offshore platforms and other facilities as artificial reefs or for other public and</p>	<p>The purpose of this section is unclear since it does not impose requirements. However, if the MMS chose to include</p>

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250.1723	<p>MMS supports and encourages the re-use of obsolete offshore petroleum structures as artificial reefs in U.S. waters.</p> <p>(a) The structure must not pose an unreasonable impediment to existing facilities such as active pipelines or future mineral development.</p> <p>(b) The re-use plan must comply with the artificial reef permitting requirements of the U.S. Corps of Engineers (Corps) and the criteria in the National Artificial Reef Plan (NARP).</p> <p>(c) The state agency responsible for managing marine fisheries resources must accept title and liability for the structure before MMS will release the Federal lessee from obligations in the lease instrument.</p> <p>(d) As appropriate, MMS may facilitate cooperation between Federal lessees, States, and other Federal agencies concerning the re-use of the structure. MMS will share information with others concerning the environmental, social, and economic consequence of re-using the structure.</p>	<p>private uses, e.g., mariculture, research, etc., under the following conditions:</p> <p>(1) The reuse plan must comply with the artificial reef permitting requirements of the U.S. Army Corps of Engineers (Corps) and the criteria in the National Artificial Reef Plan (NARP).</p> <p>(2) The state agency responsible for managing marine fisheries resources must accept title and liability for the structure before MMS will release the Federal lease from obligations in the lease instrument.</p> <p>(c) Re-use for other purposes require an assumption of regulatory authority for that re-use by the appropriate Federal/State agency.</p>	<p>this section, the policy should clearly address the conversion of platforms to other uses such as mariculture, research, etc.</p>
	<p>When might MMS approve partial structural removals for conversion to an artificial reef or other use?</p> <p>The Regional Supervisor may approve a partial structural removal if you meet all of the following conditions:</p> <p>(a) The remaining structure becomes part of the NARP and the State agency responsible for managing marine fisheries resources acquires a Corps permit and accepts title and liability for the structure; and</p>		<p>The provision of an unobstructed water column above the structure may require the removal of significant marine life. An analysis of environmental vs. navigational impacts should be allowed under the policy.</p>

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250.1725	<p>(b) You provide an unobstructed water column above the structure sufficient to ensure safety of navigation.</p> <p>What are the requirements for decommissioning a pipeline in place? You must do the following to decommission a pipeline in place:</p> <p>...</p> <p>(i) Remove a previously decommissioned pipeline if MMS subsequently determines that a pipeline is a hazard.</p>	<p>(b) You satisfy U.S. Coast Guard navigational requirements for the remaining structure.</p> <p>None offered. Clarity requested.</p>	<p>Hazard needs to be better defined and what criteria the MMS would use to deem a decommissioned pipeline a hazard.</p>