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From: Simon, John [JSimon@hess.com]
Sent: Wednesday, September 27, 2000 4:01 PM
To: 'rules.comments@mms.gov'
Subject: Comments on Proposed Rule (30 CFR Part 250, RIN 1010-AC65)

Ladies/Gentlemen:

My comments on the captioned rule are specific to proposed Section 250.1711, pertaining to requirements for trawling over a subsea dome well protector after installation.

This requirement is ostensibly intended to ensure dome performance as a stub protector and effective preventer of obstruction to future trawling.

The more robust available configurations of subsea well protector domes are made of metal with sloped sides. The primary purpose of their design is to deflect trawling gear. Inevitably, though, there will be modes of impact that will result in damage, and in extreme cases even some movement, of any well protector. Consequently, it is entirely possible that the net result of post-installation trawling would be a damaged (and/or moved) and less effective well protector, which would clearly be counterproductive.

I suggest that a more sensible approach would be for the oil industry, the MMS, and the shrimping industry to collaborate and agree on a well protector configuration that would satisfy both industries for well and trawl gear protection (which the MMS could then mandate for use in appropriate applications). Hopefully the configuration currently in use is satisfactory (have there been reported failures?), but if not, I would certainly support modifying the design in response to credible evidence supporting the need for modifications.

I am assuming that comments via e-mail are acceptable. If, however, I must submit comments by mail to have them officially received, please let me know.

Sincerely,

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