

FILES PROCESSING TEAM

OCT 9 - 2000

James E. May
1322 Farnsworth
Mobile, AL

September 27, 2000

Department of Interior
Minerals Management Service, Mail Stop 4024
381 Elden Street
Herndon, VA 20170-4817

Re: Oil and Gas Drilling Operations Regulations

Dear Sirs:

I am writing in response to your *Federal Register* Notice proposing modifications to the regulations governing oil and gas drilling operations on the Outer Continental Shelf (OCS).

I do not believe that your proposed regulations do enough to protect the environment. You are well aware that substantial numbers of OCS wells are leaking oil, both to the surface and between formations, because of inadequate isolation practices. The proposed rules foster this by their terminology, i.e., "cementing."

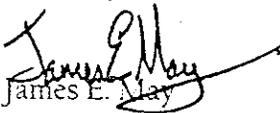
Why cement and not other sealants? Because it is inexpensive, and because many of the other sealants are proprietary, so the oil companies can't bid down the price.

The 12 hour setting time is also arbitrary, 12 hours should be stated as a minimum time, with an additional regulatory requirement that the sealant must be held under pressure until at least 90% of its ultimate compressive strength can be assured.

Specifying only minimum compressive strength of the sealant is also inadequate and reflects the agencies acquiescence to cheapest available alternatives rather than best available technology, as required by law. If cement is the allowed sealant, it should be required to meet minimum elastic properties, since typical cement fails quickly in tension and it cannot be assured that it will remain in compression in the well bore.

Finally, you should identify areas of faulting or other known geologic instability as areas to be isolated by cementing.

Sincerely,


James E. May