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Author: Jim Gormanson <JGormanson@noblecorp.com> at ~smtp
Date: 4/13/99 8:05 AM
Priority: Normal
Receipt Requested
TO: Rules Comments at -MMS-Herndon-OCS2
Subject: FW: MMS Rules for Electrical Installations [RIN 1010-AC55]

The email below is in reference to the NPRM appearing in Federal Register of 19Mar99 at 64 FR 13535, entitled Update of Documents Incorporated by Reference, affecting 30 CFR 250.

Jim Gormanson

-----Original Message-----

From: Jim Gormanson
Sent: Tuesday, April 13, 1999 7:39 AM
To: Cc: Tom Foyt; Rick Moore; Neville Franssen; Dave Beard; Wayne Wescovich; Norton Haviland; Francis Tubbs; Neil Mendoza; Paul Daigle
Subject: MMS Rules for Electrical Installations

Currently, 30 CFR 250.403(b) [Drilling Operations], and 250.802(e)4(I) and 250.803(b)(9)(i) [Production Safety Systems] require that the electrical installation on MODUs in hazardous areas to comply with API 500, Recommended Practice for Classification of Locations at Petroleum Facilities Classified as Class I, Division 1 and 2 (First edition). MMS has a proposed rule to amend 30 CFR 250.403(b), 250.802(e)4(I) and 250.803(b)(9)(i) to require that the electrical installation on Mobile Offshore Drilling Units (MODUs) in hazardous areas to comply with either API 500 (Second edition, November 1997) or API 505. API 505 is entitled Recommended Practice for Classification of Locations at Petroleum Facilities Classified as Class I, Zone 0, Zone 1 and Zone 2 (First edition, November 1997).

The hazardous areas for drilling operations on the Noble's current shipyard MODU projects conform to API 500 (Second edition, November 1997) currently. API 500 (1997) addresses other classified areas in addition to drilling operations. These areas include paint lockers and battery rooms already addressed by USCG regulations and American Bureau of Shipping MODU rules (classification society rules). The vast majority of Noble's rigs in the Gulf of Mexico should comply with the First Edition of API 500, USCG regulations and ABS MODU rules. There should be no additional impact of the proposed rule modification.

Jim Gormanson
Compliance Manager
Noble Drilling Services Inc.
10370 Richmond Avenue, Suite 400
Houston, TX 77042
Tele: 713-974-3131
Fax: 713-260-0306