



# MARINER ENERGY, INC.

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L. V. "Bud" McGuire  
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**RULES PROCESSING TEAM**

October 18, 2000

**OCT 19 2000**

**RULES PROCESSING TEAM**

**OCT 20 2000**

United States Department of the Interior  
Minerals Management Service  
381 Elden Street; Mail Stop 4024  
Herndon, Virginia 20170-4817

Attention: Rules Processing Team

**RE: 30 CFR Part 250 RIN 1010 AC43 Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Oil and Gas Drilling Operations Proposed Rule (FR June 21, 2000; Pages 38453-38474)**

Gentlemen:

Mariner Energy Inc. appreciates the opportunity to submit comments on the proposed revisions to 30 CFR 250, Subpart D Oil and Gas Drilling Operations. Mariner Energy is an independent oil and gas exploration, development and production company with principle operations in the Gulf of Mexico and along the U.S. Gulf Coast.

The reorganization of Subpart D, expressing requirements in plain language and incorporating best practices is a vast improvement over prior regulations. As a member of the Offshore Operators Committee and the American Petroleum Institute, Mariner has reviewed comments prepared by the two trade associations regarding the proposed regulatory changes. Mariner supports the OOC/API position, and would like to offer an additional comment and recommendation concerning the application of the regulations to subsea drilling and completions.

## **250.449 (b) Subsurface BOP Tests**

Mariner believes that the requirement for stump testing subsurface BOP systems prior to installation should be coupled with a subsequent requirement for function testing only, after landing the BOP stack. Mandatory pressure testing of the BOP system after landing is not justified considering the extremely low failure rate of BOP components; and the fact that the physical act of running the stack imposes little to no stress on functional components of the BOP system. Function testing after installation will ensure that all control circuits are operating properly. This minor revision to the proposed regulations has a potentially huge beneficial impact. The additional time (18-24 hours) for pressure testing BOPs can add \$150,000-\$300,000 or more to the cost of an individual subsea well.