

# PUBLIC SUBMISSION

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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Sulphur Operations

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Mark Sokolow 8-11-13

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## Submitter Information

**Name:** Mark Sokolow

**Address:**

338 Wedgerock  
Webster, TX, 77598

**Email:** mark@mtsokolow-attorney.com

**Organization:** NA

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## General Comment

### COMMENTS ON PROPOSED RULES, REGULATIONS OR AGENCY ACTIONS:

Your notice indicated the following:

“Regulations at 30 CFR part 250, subpart P, implement these statutory requirements. The BSEE uses the information collected to ascertain the condition of drilling sites for the purpose of preventing hazards inherent in sulphur drilling and production operations and to evaluate the adequacy of equipment and/or procedures to be used during the conduct of drilling, well-completion, well-workover, and production operations. The BSEE uses the information to:

- Ascertain that a discovered sulphur deposit can be classified as capable of production in paying quantities.
- Ensure accurate and complete measurement of production to determine the amount of sulphur royalty payments due the United States; and that the sale locations are secure, production has been measured accurately, and appropriate follow-up actions are initiated.
- Ensure the adequacy and safety of firefighting plans; the drilling unit is fit for the intended purpose; and the adequacy of casing for anticipated conditions.
- Review drilling, well-completion, well-workover diagrams and procedures, as well as production operation procedures to ensure the safety of the proposed sulphur drilling, well-completion, well-workover and proposed production operations.
- Monitor environmental data during sulphur operations in offshore areas where such data are not already available to provide a valuable source of information to evaluate the performance of drilling rigs under

various weather and ocean conditions. This information is necessary to make reasonable determinations regarding safety of operations and environmental protection.”

On July 21, 2010, the API issued a press release on a new rapid response system to protect the Gulf formed by Exxon Mobil, Chevron, Conoco Phillips and Shell. This interim containment system has been demonstrated by Marine Well Containment Company. The members of this company include Exxon Mobil, Chevron, Shell, Conoco Phillips, bp, Apache, Anadarko, Bhp billiton, Stat Oil and Hess. They have invested over a billion dollars into this program and apparently, BOEM has authorized exploration based on this program.

I have a concern as to the permitting of companies in the Gulf who do not belong to this association or who do not affirmatively show that they have an interim containment system in place.

Also, a comparative risk analysis of blowout scenarios should be attached to each permit application comparing the probability and consequence of risks, similar to what was suggested by Delmar Engineering.

If a company is affiliated with the Marine Well Containment Company, their permits should be expedited.

MARK SOKOLOW  
ATTORNEY AT LAW  
338 Wedgerock  
Webster, Texas 77598  
<http://mtsokolow-attorney.com>  
[mark@mtsokolow-attorney.com](mailto:mark@mtsokolow-attorney.com)