

PUBLIC SUBMISSION

As of: August 26, 2013 Received: August 25, 2013 Status: Posted Posted: August 26, 2013 Tracking No. 1jx-878g-2mbn Comments Due: September 16, 2013 Submission Type: Web

Docket: BSEE-2013-0003
1014-0006 Subpart P IC

Comment On: BSEE-2013-0003-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Sulphur Operations

Document: BSEE-2013-0003-0003
Comment from Mark Sokolow 8-25-13

Submitter Information

Name: Mark Sokolow

Address:

338 Wedgerock
Webster, TX, 77598

Email: mark@mtsokolow-attorney.com

Organization: NA

General Comment

COMMENTS ON PROPOSED RULES, REGULATIONS OR AGENCY ACTIONS:

I am concerned that you are flooding the oil and gas companies with too many reporting regulations. You need to enter into the digital age. I would recommend that the federal government and the oil and gas industry simply work on a software program, wherein this information can be electronically entered into at the rig from certain key personnel and that it is immediately available to the companies representatives on land, to the BSEE, to BOEM and to emergency responders. Also, in many cases, inspections can be done by cameras.

The issue gets down as to who in charge of the rig in case of an emergency. You are going to have a problem if you have inexperienced inspectors telling seasoned professional engineers what to do in the case of an emergency.

I would recommend that permit fees and royalties be lowered as to assist the oil and gas companies in utilizing the latest electronic monitoring equipment and reporting software.

Also, please post a notice with one list of all the information that you expect to receive from an oil and gas company.

MARK SOKOLOW
ATTORNEY AT LAW

338 Wedgerock
Webster, Texas 77598
<http://mtsokolow-attorney.com>
mark@mtsokolow-attorney.com