



## Comment on BSEE-2014-0002-0001

This is a Comment on the **Bureau of Safety and Environmental Enforcement (BSEE) Proposed Rule: Oil and Gas and Sulphur Operations in the Outer Continental Shelf: Incorporated Cranes Standard**

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### Comment

These is not my wording but I am in complete agreement with it as an operator in the GOM.

250.108(e) If you mount a crane on a fixed platform after [EFFECTIVE DATE OF FINAL RULE], the crane must meet the requirements of API Spec. 2C, Seventh Edition.

This requirement does not take into account the use of temporary cranes that may have been manufactured prior to 2003 and still in service using the current RP 2D requirements. As written, this new language will require that ALL temporary cranes installed after the effective date must meet the 7th Ed requirements. Currently the 6th edition of API RP 2d is in place and 7th edition allows for temporary crane to meet the 3rd edition or higher. This also states that any refurbished crane or relocation crane will have to meet the 7th edition requirements. This would mean if a drilling rig comes on location and you send it in from offshore to refurb it cant return. Also 5th edition and prior edition cranes are not able to be brought up to the 7th edition requirements. This would not allow older cranes to be refurbished and brought back offshore. This poses 2 problems that will affect our industry in a negative manner. There are not enough temporary cranes that meet 7th edition and will not allow refurbishment of older cranes. The ruling should be specific to new cranes ONLY and platforms installed after the March 17, 2003. This will allow newer cranes to start being put in the Gulf of Mexico and as old platforms are pulled only API 2C Latest edition cranes are installed on newer platforms. We should be able to still refurbish and replace cranes on platforms installed prior to March 17, 2003 with cranes that meet API RP 2D Latest Edition. This will encompass Temporary cranes as well as there is a section to cover Temporary cranes that states they must meet a minimum of the 3rd edition of API 2C.

### Document Information

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