

Oil and Gas and Sulfur Operations on the Outer Continental Shelf—Revisions to the Requirements for Exploratory Drilling on the Arctic Outer Continental Shelf

RIN 1082-AA05

Comments submitted by Elmer P. Danenberger, October 4, 2026

The proposed revisions to the Arctic drilling regulations will improve the prospects for responsible oil and gas exploration in the Beaufort and Chukchi Seas.

Removing the same-season-relief-well (SSRW) requirements is an essential precursor to the renewal of arctic drilling activity. The SSRW provision makes Arctic operations cost prohibitive, while at the same time increasing safety and environmental risks.

The SSRW requirement increases risks by dictating unnecessary and premature well suspensions, imposing time pressures, and increasing operational complexity. Keep in mind that the two worst well control incidents in the past 20 years, the Macondo (2010) and Montara (Australia, 2009) blowouts, occurred during well suspension operations.

While increasing risks, the SSRW requirements provide essentially no benefit. Given that there is at least a 50% chance that rig mobilization, relief well planning, drilling, repeated surveying, and plugging a flowing well would take more than the specified 45 days specified in the current regulation (30 CFR 250.472), a SSRW is not a realistic well control option. Also, note that since OCS regulators began keeping detailed records, no US OCS drilling blowout has been killed with a relief well. **Costly requirements that purport to mitigate risks, but in fact do the opposite, are the worst form of regulation.**

Use of a Subsea Isolation Device (SSID), as proposed for 250.472: An SSID should not be installed for the purpose of avoiding the problematic SSRW requirement, but to further reduce well control risks at appropriate locations. **The potential risks and benefits of an SSID should be assessed on a case-by-case basis** considering water depth, temperature related BOP failure risks, wellhead integration, ice and vessel traffic exposure, and other factors.

As is the case for floating drilling operations anywhere, the focus in the Arctic should be on well design, integrity, and control. By carefully verifying casing and cement integrity, ensuring complete barrier redundancy, and having standby capping and containment capability, the probability of a sustained oil blowout can be reduced to 10^{-6} or lower.

Lastly, the Arctic drilling regulations, which divide regulatory responsibilities that should be integrated, further demonstrate the importance of consolidating BOEM and BSEE in the Marine Minerals Administration. [Regulatory fragmentation](#) creates gaps, overlap, uncertainty, and confusion which divert safety management resources and increase operational risks.