

From the desk of G. A. Aaker, Jr., PE.

**Engineering Service, L.P., is cited in the new
Bureau of Safety and Environmental Enforcement (BSEE)**

WELL CONTROL RULE

²⁷ Several recent studies have estimated the probabilities of blowout failures under a wide range of circumstances. See, e.g., "Blowout Preventer (BOP) Failure Event and Maintenance, Inspection and Test (MIT) Data Analysis for the Bureau of Safety and Environmental Enforcement (BSEE)," American Bureau of Shipping and ABSG Consulting Inc., (under BSEE contract M11PC00027), June 2013; "Improved Regulatory Oversight Using Real-Time Data Monitoring Technologies in the Wake of Macondo," K. Carter, U. of Texas at Austin, 2014, published with E. van Oort and A. Barendrecht, Society of Petroleum Engineers, 2014; "Deepwater Horizon Blowout Preventer Failure Analysis Report to the U.S. Chemical Safety and Hazard Investigation Board," Engineering Services, LP, 2014. Given this accumulated knowledge of failure likelihoods under various circumstances, and analysis of how those likelihoods would be reduced by the rule, BSEE determined that 1 percent is a reasonable lower-bound of risk reduction that could occur as a result of the rule, although in BSEE's expert opinion, the actual risk reduction from the rule will likely be substantially higher than 1 percent.

²⁸ U.S. Department of the Interior. BOEM. 2012. Economic Analysis Methodology for the Five Year OCS Oil and Gas Leasing Program for 2012-2017. BOEM OCS Study 2012-022.

²⁹ The BOEM Case Study presents per-barrel costs associated with a catastrophic event. We use this estimate because the BOEM Case Study represents a recent estimate for the costs associated with an oil spill which includes data from the *Deepwater Horizon* incident.