

Departures to 30 CFR 250

THE FOLLOWING INFORMATION SUMMARIZES INFORMATION REQUIRED IN THE FEDERAL REGISTER, PART III, 30-CFR-PART 250, SUBPART D – OIL AND GAS DRILLING OPERATIONS DATED OCTOBER 14, 2010. FOR EACH ITEM, A DESCRIPTION OF OUR STRATEGY IS INCLUDED. THE LAST COLUMN INDICATES WHETHER THIS IS FOR A WAIVER OR INFORMATION.

Federal Register Item	Description	Request & Rationale	Info/Waiver
250.447 c	You must test your BOP system: Before drilling out each string of casing or a liner. The District Supervisor may allow you to omit this test if you didn't remove the BOP stack to run the casing or liner and the required BOP test pressures for the next section of the hole are not greater than the test pressures for the previous BOP test. You must indicate in your APD which casing strings and liners meet this criteria.	BHPB intends to test BOPE as follows: 1) Blind/Shear test pressures will be limited to the required casing test pressure in the APD. 2) The BOP test will not be conducted after setting any liner unless (a) the 14 day time interval have elapsed since the last test, or (b) the required BOPE test pressure at the wellhead for the next hole section is greater than the test pressure at the wellhead for the previous BOP test.	Waiver
250.447 c	You must test your BOP system: Before drilling out each string of casing or a liner. The District Supervisor may allow you to omit this test if you didn't remove the BOP stack to run the casing or liner and the required BOP test pressures for the next section of the hole are not greater than the test pressures for the previous BOP test. You must indicate in your APD which casing strings and liners meet this criteria.	Request waiver to test blind/shear rams only at each casing seat, commensurate with the casing test.	Waiver
250.448 b	The high pressure test must equal the rated working pressure of the equipment or be 500psi greater than your calculated MASP for the applicable section of hole. Before you may test BOP equipment to the MASP+500psi, the District Supervisor must have approved those test pressures in your APD.	The initial BOP test will be pressure tested with seawater per the APD. Request waiver to test sweep valves and upper choke fail-safes only to required annular test pressures (sweep valves and upper choke fail-safes located above the upper most pipe ram per BOP stack diagram).	Waiver
250.461b	Survey requirements for directional well. Conduct directional surveys on each directional well and digitally record the results. Surveys must give both inclination and azimuth at intervals not to exceed 500 ft during the normal course of drilling. Intervals during angle changing portions of the hole may not exceed 100 ft.	Request that MWD survey course lengths be allowed up to 135 ft to accommodate the stand length utilized on the rig Development Driller I (DDI). The standard stand length on the DDI is approximately 135 ft.	Waiver