

**Project ID:** REG-HQ-0018

**Project Title:** Oil and Gas and Sulphur Operations in the Outer Continental Shelf (OCS) - Data Release and Definitions

**Comment Period End Date:** 06/21/2005

**Comment ID:** REG-HQ-0018-C0000002

**Inbox Title:** Offshore Operators Committee Comments to REG-HQ-0018

OOC appreciates the opportunity to comment on the proposed rule making and offers the following comments and is attaching a more detailed review of the sections. It is requested that MMS include definitions for items listed in 250.196(b) specifying what MMS considers to be Geological Data, geophysical data, interpreted G&G data, analyzed geological information, etc. Without any definitions it is hard to know for sure when certain data types will be released such as pressure data, velocity surveys, geochemical data etc. OOC's specific comments are provided in the attached Word file for MMS use.

**Comment Title:** Offshore Operators Committee Comments to REG-HQ-0018

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**Oil and Gas and Sulphur Operations in the Outer Continental  
Shelf (OCS) - Data Release and Definitions  
REG-HQ-0018  
6-21-05**

250.105 Definitions

It is requested that MMS include definitions for items listed in 250.196(b) specifying what MMS considers to be Geological Data, geophysical data, interpreted G&G data, analyzed geological information, etc. Without any definitions it is hard to know for sure when certain data types will be released such as pressure data, velocity surveys, geochemical data etc.

250.194 Archeological report

Only concern with new wording is timing of when the Regional Director (RD) will notify operators that an archeological report is required. Request that it be reworded so if a lease is added to the blocks that will require an archeological survey for, that the RD notify the existing operator when it is added, not when an EP or DOCD is submitted to the MMS. This is too late in the process when the plan is submitted to have the survey performed. The same notification would be helpful if the archeological designation is removed by the MMS from an active lease.

250.195 Notification of Production Status of wells

NTL 2002-G10 allows 5 business days to notify the District Manager of placing a well in a production status, but this new rule says "on the date" that a well is placed in a production status. When a new well is turned on, there is a clean-up period and actual hydrocarbon production may not commence until several days later. It may be on a weekend or during the night.

The Supplementary Information to this proposed change, Paragraph 4, states that the "first production notice" is being added, "because this information has become one of the prime parameters in determining inspection and testing schedules for safety systems devices". There is also a requirement that when a new production system is started up that we notify the District Supervisor 48 hours in advance of starting up the production system. This could lead to confusion about which notice is being made since it is industry understanding that this is done to allow for inspection of the new system before start-up or shortly thereafter.

We request that industry be allowed the five business days as in the past for the notification after hydrocarbons are brought to the surface so that it will not be an unnecessary reporting burden.

Additionally if a EOR report is sent in with the status of shut in, waiting on production facilities, the public information copy of the EOR is without bottom hole or producing

interval information. The public is therefore denied access to this information as prescribed in this rule. Since the notice of first production is being formalized as a requirement, we request that it be made available to the public.

250.197(a) Data and Information to be made available to the public

We are concerned with the addition of or changes to the following forms:

123S (Supplemental APD) & 137(OCS Plan Information) are released when the well goes on production or according to paragraph (b) of the same section. We are concerned with the release when the well comes on production, since this is proposed information and actual data is available on the EOR, Subsequent APM and/or Final WAR. The 137 contains proposed bottom hole locations for all the wells in the plan and if only one well has been drilled and is producing, the other proposed bottom hole locations should still be confidential.

125 (End of Operations Report) Our previous understanding was that significant (geological) markers were not made available to the public. What category does the MMS classify this as in paragraph (b)?

127 (SRI) Release of fluid analysis data and volumetric data after two years makes proprietary data such as reserve estimates, recovery efficiencies, and recovery estimates public information. We would desire to keep this proprietary data non-releasable during production as we consider it to be competitive in nature.

Since the log data is available to the public two years after the submittal date, we feel this is sufficient data for the public if they want to look at the data and make their own estimates of reserves/recoveries without being privy to an operator's proprietary interpretations.

133 (WAR) It is our understanding that this form is used by the MMS to follow an operator's progress on a job for inspections and to ensure compliance with approved permits. We feel this detailed information of our day-to-day operations is proprietary data and to release it to the public gives others an unfair competitive advantage. Combined with the entire APD & 123S another operator can piece together our entire drilling plan. We feel enough data is available to the public on the EOR, Subsequent APM or/or final WAR. We would not have an issue with releasing the Special Well Events that are described in the Ewell War as they relate to possible safety issues.

250.197(b)

We would appreciate definitions of what is meant by " downhole locations", " operations", and "equipment" in the "MMS will release" column.

250.199(e)

The form names listed such as Sundry Notices, MER, and Well Summary Report are being replaced by those in 250.197(a).