RULES PROCESSING TEAM

AUG 2 6 2004

August 23, 2004

Rules Processing Team (RPT) MS 4024
Department of the Interior
Minerals Management Service
381 Elden Street
Herndon, Virginia 20170-4817

Re: Notice of Proposed Rulemaking
RIN 1010-AC96
Oil and Gas and Sulphur Operations in the Outer Continental Shelf
Coiled Tubing Operations

Gentlemen:

The Offshore Operators Committee (OOC) appreciates this opportunity to provide written comments on the subject proposed rulemaking regarding minimum blowout prevention systems for well workover operations utilizing coiled tubing on production trees in the OCS, as provided in the **June 22, 2004 Federal Register Notice**. The deadline of the comment period was **August 23, 2004**.

Listed below are the comments developed during the review process and are offered as improvements on the current wording or modifications to fit the technical aspects of the proposed process or component:

250.615 (e)(1) - The "Kill line outlet" referenced should be the "Kill line inlet". This line is used for pumping kill fluid into the well and is not commonly used to flow out of.

260.615 (e) (5) – The requirement for hydraulically controlled valves on both lines could be onerous for some situations such as P&A operation on dead or depleted wells with less than 3,500 expected psig surface pressure. We suggest wording be added to allow exceptions to be granted in special situations that would allow leaving the hydraulic actuation requirement off and using manual valves instead. Some circumstances require the ability to be able to flow back from both sides of the flow cross unit. We can comply with this Clause by use of the kill line inlet dual full opening valves. Would this BOP rig up configuration comply with this clause? Also, we question the need to require one valve to be remotely controlled in all BOP rig up cases.

Possibly for wells with no H_2S or for those wells which have lower wellhead pressures, the use of dual manual valves could be sufficient.

260.615 (e)(5) – "For operations with expected surface pressure of 3,500 psi or greater, the kill line must be connected to a pump." We recommend that this statement be appended to read: "For operations with expected surface pressure of 3,500 psi or greater, the kill line must be connected to a pump or manifold."

260.615 (e)(7) – "All connections used in the surface BOP system must be flanged." Please clarify that the statement means the equipment shown in the table and does not include kill or flow lines. We recommend the revision of the clause to state: "For BOP systems when expected surface pressures are greater than 3,500 psig, all riser connections from wellhead to below the stripper must be flanged." It is felt that for expected surface pressure less than 3,500 psig, the BOP kill line inlet valves can be two full opening manual plug (hammer union type) valves.

260.616 (a)(2) – "Ram-type BOP's, related control equipment, including the choke and kill manifolds, and safety valves must be successfully tested to the rated working pressure of the BOP equipment or as otherwise approved by the District Manager." We recommend that this clause be changed to state "Ram-type BOP's, related control equipment, including the choke and kill manifolds, and safety valves must be successfully tested to 1,500 psig above the maximum expected shut in wellhead pressure (not to exceed to wellhead working pressure) or as otherwise approved by the District Manager."

260.616 (a) (2) – "Variable bore rams must be pressure tested against all sizes of drill pipe in the well excluding drill collars." Our feeling is that this does not apply to coiled tubing functions and is a holdover from the source document used in writing this rule. Our recommendation is that this be deleted.

260.616 (f) – We request that the required pressure test duration on coiled tubing BOP tests be changed from 10 minutes to 5 minutes. The API Coil Committee originally agreed on the 10 minute duration and then, after further discussion, agreed that it should be changed back to 5 minutes. The recommended change to 5 minutes would save approximately ½ hour of testing time each week.

OOC is an organization of some 113 companies who conduct essentially all of the OCS oil and gas exploration and production activities in the Gulf of Mexico. Comments made on behalf of OOC are submitted without prejudice to any member's right to have or express different or opposing views. Again, OOC appreciates this opportunity to provide comments.

Sincerely,

Allen Verret, PE
Executive Director

CC: Mr. Phil Smith-Shell Ms. Sandi Fury-CVX Mr. Charlie Duhon-KMG