

BOEMRE

UNITED STATES DEPARTMENT
OF THE INTERIOR

Bureau of Ocean Energy Management,
Regulation & Enforcement

Departures Discussion

Troy Trosclair

Deputy Regional Supervisor for District Operations



Discussion:

- What is an alternate procedure? Or alternate equipment?
- What is a departure?
- What is not a departure?
- Departure Consistency



30 CFR 250.141

- **May I ever use alternate procedures or equipment?**
- You may use alternate procedures or equipment after receiving approval as described in this section.
- (a) Any alternate procedures or equipment that you propose to use must provide a level of safety and environmental protection that equals or surpasses current MMS requirements.
- (b) You must receive the District Manager's or Regional Supervisor's written approval before you can use alternate procedures or equipment.
- (c) To receive approval, you must either submit information or give an oral presentation to the appropriate Supervisor. Your presentation must describe the site-specific application(s), performance characteristics, and safety features of the proposed procedure or equipment.



Sec. 250.408

- **May I use alternative procedures or equipment during drilling operations?**
- You may use alternative procedures or equipment during drilling operations after receiving approval from the District Manager. You must identify and discuss your proposed alternative procedures or equipment in your Application for Permit to Drill (APD) (Form MMS-123) (see Sec. 250.414(h)). Procedures for obtaining approval are described in section 250.141 of this part.



Example 250.141/250.408

- Digital BOP Testing Software
- Utilizes alternate procedures and alternate equipment
- You should identify and discuss the alternate procedure/equipment you are requesting in your APD (see Sec. 250.414(h)).



30 CFR 250.142

- **How do I receive approval for departures?**
- We may approve departures to the operating requirements. You may apply for a departure by writing to the District Manager or Regional Supervisor.



30 CFR 250.409

- **May I obtain departures from these drilling requirements?**
- The District Manager may approve departures from the drilling requirements specified in this subpart. You may apply for a departure from drilling requirements by writing to the District Manager. You should identify and discuss the departure you are requesting in your APD (see Sec. 250.414(h)).



Example 250.142/250.409

- Requests to extend blind shear function testing beyond 7 days to avoid unnecessary trips and their associated pipe handling and well control risks. Shear/Blind rams can be function tested immediately when the drill string is above the BOP.
- This could be considered an alternate procedure if an operator could show that increasing the timeframe is as safe or safer???
- This request may enhance operational efficiency, however, is it as safe?
- A Departure may be considered due to the overall operational safety
- You should identify and discuss the departure you are requesting in your APD (see Sec. 250.414(h)).



What is NOT a departure?

- **§ 250.421 What are the casing and cementing requirements by type of casing string?**
- The table in this section identifies specific design, setting, and cementing requirements for casing strings and liners. For the purposes of subpart D, the casing strings in order of normal installation are as follows: drive or structural, conductor, surface, intermediate, and production casings (including liners). **The District Manager may approve or prescribe other casing and cementing requirements where appropriate.**



Example

- 30 CFR 250.421(c) *for surface casing*: requires the operator to use enough cement to fill the calculated annular space to at least 200 ft inside the conductor casing.
- But the Operator does not want to cement the annular space inside the conductor due to thermal expansion concerns.
- The District Manager can approve, it is not considered a departure. It only needs to be addressed, preferably in the Drilling Prognosis, and approved through the permit.



Additional regulations that allows the District Manager to approve alternate requirement ~ no departure needed:

- Subpart D

- § 250.423
- § 250.425
- § 250.442(c)
- § 250.447(c)
- § 250.456 (f)(2)
- § 250.459(a)(3)
- § 250.463



Consistency of Departures

- BOEMRE is currently working on OOC's "green list" of departures
- BOEMRE is currently working to address inconsistencies between Districts in granting departures
- BOEMRE will use OOC's prioritization based on highest impact to operations
- Some decisions may need to be elevated to BOEMRE HQ
- Departures or alternate procedures/equipment that are determined to be routine will be pursued to be codified
- Decisions on departures and alternate procedures/equipment will be communicated to the district as they are made
- Decisions on those request that are not considered departures or alternated procedures will be listed and communicated to the Districts in the form of Policy
- BOEMRE is proposing to communicate the decisions to operators through quarterly OOC meetings



Thank You

Contact Information

Email troy.trosclair@boemre.gov

Phone 504-736-2923

