

Revised Permit to Modify (RPM)

Lease P00444	Area SM	Block 6374	Well Name A028	ST 00	BP 01	Type Development
Application Status Approved		Operator 03280 Freeport-McMoRan Oil & Gas LLC				
Pay.gov Amount:		Agency Tracking ID:		Pay.gov Tracking ID:		
General Information						
API 560452008400		Approval Dt 27-AUG-2025		Approved By Junaid Ashfaq		
Submitted Dt 08-JUL-2025		Well Status Temporarily Abandoned		Water Depth 242		
Surface Lease P00441		Area SM		Block 6374		
Approval Comments						
Correction Narrative RPM being filed to include AC and departures.						
Permit Primary Type Abandonment Of Well Bore						
Permit Subtype(s) Temporary Abandonment						
☐ Proposed or ☐ Completed Work						
Operation Description						
Procedural Narrative Please refer to attached procedures and WBS.						
Subsurface Safety Valve Type Installed N/A Feet below Mudline Maximum Anticipated Surface Pressure (psi) 1615 Shut-In Tubing Pressure (psi) 0 Maximum Anticipated Wellhead Pressure (psi) Shut-In Wellhead Pressure (psi)						
Rig Information						
Name * HYDRAULIC WORKOVER UNIT		Id 47935	Type Hydraulic Workover	ABS Date 31-DEC-2049	Coast Guard Date 31-DEC-2049	
Blowout Preventers						
Preventer		Size	Working Pressure	--- Test Pressure --- Low High		
Wireline Luber			5000	2200		
Annular			5000	250 1400		
Rams		21.25	5000	250 2200		
Date Commencing Work (mm/dd/yyyy) 01-AUG-2025						
Estimated duration of the operation (days) 14						
Verbal Approval Information						
Official			Date (mm/dd/yyyy)			
Questions						
Number	Question	Response	Response Text			

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Questions

Number	Question	Response	Response Text
A	Is H2S present in the well? If yes, then comment on the inclusion of a Contingency Plan for this operation.	YES	Previously submitted.
B	Is this proposed operation the only lease holding activity for the subject lease? If yes, then comment.	NO	
C	Will all wells in the well bay and related production equipment be shut-in when moving on to or off of an offshore platform, or from well to well on the platform? If not, please explain.	YES	
D	If sands are to be commingled for this completion, has approval been obtained?	N/A	
E	Will the completed interval be within 500 feet of a block line? If yes, then comment.	N/A	
F	For permanent abandonment, will casings be cut 15 feet below the mudline? If no, then comment.	N/A	
G	Will you ensure well-control fluids, equipment, and operations be designed, utilized, maintained, and/or tested as necessary to control the well in foreseeable conditions and circumstances, including subfreezing conditions?	YES	
H	Will digital BOP testing be used for this operation? If "yes", state which version in the comment box?	YES	OTC Greenlight Version 2.0
I	Is this APM being submitted to remediate sustained casing pressure (SCP)? If "yes," please specify annulus in the comment box. If you have been given a departure/denial for SCP, include in the attachments.	YES	SCP, 9-5/8" = 298 psi and 13-3/8" casing = 31 psi

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J	Are you pulling tubulars and/or casing with a crane? If "YES" have documentation on how you will verify the load is free per API RP 2D. This documentation must be maintained by the lessee at the lessee's field office.	NO	
K	Will the proposed operation be covered by an EPA Discharge Permit? (Please provide permit number comments for this question).	N/A	
L	Will you be using multiple size work string/ tubing/coil tubing/snubbing/wireline? If yes, attach a list of all sizes to be used including the size, weight, and grade.	YES	Drillpipe - 3½", 13.3, S-135 Electric Line - 7/32", 0.092, GEIPS
M	For both surface and subsea operations, are you utilizing a dynamically positioned vessel and/or non-bottom supported vessel at any time during this operation?	NO	

ATTACHMENTS

File Type	File Description
pdf	Rig/Coil Tubing/Snubbing Unit BOP Schematic
pdf	Proposed Wellbore Schematic
pdf	Current Wellbore Schematic
pdf	20in Cmt Diff Analysis Calc
pdf	Cement Bond Index, Well Cementing, E.B. Nelson
pdf	Class G Cmt Compressive Strength & Shear Bond Strength
pdf	Equipment Layout
pdf	ISS degasser Calc
pdf	Narrative Ops
pdf	Procedures
pdf	Rig Up Analysis
pdf	Test Procedures
pdf	Test Schematic
pdf	Well A-28 CER

CONTACTS

Name	Aaron Novy
Company	Freeport-McMoRan Oil & Gas LLC

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Phone Number

E-mail Address

Contact Description

CONTACTS

979-739-1679

anovy@fmi.com

Nancy Rodriguez

Freeport-McMoRan Oil & Gas LLC

281-539-7640

nrodrigu@fmi.com

CERTIFICATION: I certify that information submitted is complete and accurate to the best of my knowledge. I understand that making a false statement may subject me to ci

Name and Title	Date
Nancy Rodriguez, Regulatory Supervisor	08-JUL-2025

PAPERWORK REDUCTION ACT OF 1995 (PRA) STATEMENT: The PRA (44 U.S.C. 3501 et seq. Requires us to inform you that we collect this information to obtain knowledge of equipment and procedures to be used in drilling operations. MMS uses the information to evaluate and approve or disapprove the adequacy of the equipment and/or procedures to safely perform the proposed drilling operation. Responses are mandatory (43 U.S.C. 1334). Proprietary data are covered under 30 CFR 250.196. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB Control Number. Public reporting burden for this form is estimated to average 11/4 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, N.W., Washington, DC 20240.

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Variances Requested for this Permit

Variance Status:	APPROVED
Variance Type:	Alternate Compliance
Variance Title:	TA operations
Regulation Number:	30 CFR 250.1715(a)(4)
Oper. Justification:	FMOG requests an Alternate Compliance to 30 CFR 250.1715(a)(4)(ii) in setting the 20" inflatable bridge plug within less than 50' of the 13-3/8" stub end at 682' MD due to only milling a 20' window in the 13-3/8" casing to accommodate 10' of cement in the 20" casing.
Variance Date:	
BSEE Decision Remarks:	accepted 27-AUG-25

Variance Status:	APPROVED
Variance Type:	Departure
Variance Title:	TA operations
Regulation Number:	30 CFR 250.1715(a)(6)
Oper. Justification:	#1. FMOG requests a departure to 30 CFR 250.1715(a)(6) to section mill a window of sufficient length in the 13-3/8" casing to accommodate setting a mechanical barrier and spot less than 200' of cement in the 20" casing to isolate the 13-3/8" x 20" hole section. FMOG will mill a 20' window in the 13-3/8" casing and set 10' of cement on the mechanical barrier set in the 20" casing. . The departure is requested for the following justification: o Milling a window in the 13-3/8" casing sufficient enough to accommodate a mechanical barrier and 200' of cement in the 20" casing is not necessary to accomplish the primary objective of: - Isolating the 13-3/8" x 20" hole section, by setting an inflatable bridge plug in the 20" casing, thus isolating the 13-3/8" casing and 20" casing. - The more exposure the section tool has to cuttings from the 13-3/8" casing could limit the success of pulling the section tool back to surface. - The 20" casing is the outer most casing in the well. The longer the milling tools scrape or hone the ID of the 20" casing with a longer length window, the greater the risk is of puncturing a hole in the 20" casing and thus exposing the well to open hole conditions. o At 65% cement bond strength, which is considered the pessimistic case for cement bond in an open hole situation, of the 15.6 ppg Class G Cement, the differential pressure of 10' of cement inside the 20", 94 ppf, J-55 casing is 3,426 psi. The MASP of the well is 1,615 psi, which is the worst-case exposure to the 20" casing in the event of reservoir repressuring or channeling pressure. 3,426 psi > 1,615 psi. Please see the attached document labeled, Cement Bond Strength Differential Analysis for 10' of 15.6 ppg Class G Cement in the 20" Casing. o As per procedure FMOG is performing the following procedure to
Variance Date:	

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		ensure that the inflatable packer is holding pressure from below the inflatable packer prior to performing cementing operations. - Manufacturer pull test on the inflatable packer once the packer is set against the 20" casing ID. - Bubble test of the packer for 90 minutes. - Release from packer. - Bubble test of the packer for 90 minutes. - FMOG will subsequently bubble test the 20" casing from surface after the packer and cement are set.
BSEE Decision	accepted	
Remarks:	27-AUG-25	
Variance Status:	APPROVED	
Variance Type:	Alternate Compliance	
Variance Title:	TA operations	
Regulation Number:	30 CFR 250.737(b)(1)	
Oper. Justification:	FMOG requests an Alternate Compliance to 30 CFR 250.737(b)(1) and CFR 250.737(b)(2) to only test the inside of the choke and kill side outlet valves.	
BSEE Decision:	accepted	
Remarks:	27-AUG-25	
Variance Status:	APPROVED	
Variance Type:	Alternate Compliance	
Variance Title:	TA operations	
Regulation Number:	30 CFR 250.737(b)(2)	
Oper. Justification:	FMOG requests an Alternate Compliance to 30 CFR 250.737(b)(1) and CFR 250.737(b)(2) to only test the inside of the choke and kill side outlet valves.	
BSEE Decision:	accepted	
Remarks:	27-AUG-25	
Variance Status:	APPROVED	
Variance Type:	Alternate Compliance	
Variance Title:	Digital BOP testing	
Regulation Number:	30 CFR 250.737(c)	
Oper. Justification:	FMOG requests an alternate compliance to 30 CFR 250.737(c) to use BOPE testing software, OTC Greenlight Version 2.0.21, in a predictive mode.	
Variance Date:	accepted	

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BSEE Decision 27-AUG-25
Remarks:

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Existing Variances

No previously approved variances exist for this permit

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Reviews

Review:	APM - District Production Engineering Review
Sent:	30-JUL-25
Review Started:	20-AUG-25
Review Finished:	20-AUG-25
Info Adequate:	Y
Review Remarks:	

Review:	BOP Control System Drawing Review
Sent:	20-AUG-25
Review Started:	20-AUG-25
Review Finished:	20-AUG-25
Info Adequate:	Y
Review Remarks:	

Review:	Determination of NEPA Adequacy
Sent:	10-JUL-25
Review Started:	10-JUL-25
Review Finished:	10-JUL-25
Info Adequate:	Y
Review Remarks:	

Review:	Regional Concurrence Departure Review
Sent:	27-AUG-25
Review Started:	27-AUG-25
Review Finished:	27-AUG-25
Info Adequate:	Y
Review Remarks:	