

Application for Permit to Modify (APM)

Lease P00440	Area SM	Block 6373	Well Name A014	ST 00	BP 03	Type Development
Application Status Approved		Operator 03280 Freeport-McMoRan Oil & Gas LLC				
Pay.gov Amount: \$145.00		Agency Tracking ID: EWL-APM-258135		Pay.gov Tracking ID: 27S5EJRU		
General Information						
API 560452007000		Approval Dt 14-OCT-2025		Approved By Bethram Ofole		
Submitted Dt 25-SEP-2025		Well Status Completed		Water Depth 242		
Surface Lease P00441		Area SM		Block 6374		
Approval Comments						
Conditions of Approval: 1)All operations must be conducted in accordance with the OCS Lands Act (OCSLA), the lease terms and stipulations, the regulations of 30 CFR Part 250, Notices to Lessees and Operators (NTLs), the approved (revised) Application for Permit to Modify (APM/RPM), and any written instructions or orders of the District Manager. 2)A copy of this permit (including all attachments) must be kept on location and made available to inspectors upon request during the permitted operation. 3)A revised PE certification is needed if (1) the plug type changes in any way including changes in cement properties, (2) any plug's base setting depth (even the ones that are not required per 250.1715), changes ± 100 ' TVD, (3) the pressure test changes on any plug, (4) less cement is to be pumped, (5) more cement is to be pumped in order to isolate a hydrocarbon zone that was not anticipated in the original permit, (6) a remedial cement job is required that was not included in the original permit, or (7) any plug change that makes you deviate from the §250.1715 table. You must have a PE certify these changes prior to these operations being performed. You must submit a revised permit with the PE certification for the revisions to this office within 72 hours. 4)While conducting operations, you must have a current OSFR Coverage for the lease (if applicable). If the lease's OSFR coverage will expire during OCS operations, you must submit an RPM to include the OSFR coverage to BSEE prior to the expired date. 5)If well pressures exceed the permitted MASP/SITP pressures, the well control equipment in use must be tested at a minimum to the new observed pressure plus 500psi. The appropriate District must be immediately notified of these pressure changes and an RPM submitted to document the change. If utilizing wireline, the wireline lubricator must be tested to equal to or greater than the new observed pressure. 6)High pressure blind shear ram close capability must be available from all BOP control panels. Each BOP control panel must be clearly marked to indicate that the accumulator system high pressure side is required for closing and shearing the drill pipe with the blind-shear rams. If the high-pressure bypass selector valve is not available at all BOP control panels, then the accumulator system must be set in the high-pressure position at all times except for pressure and function testing. 7)You shall not conduct operations that require the BOP on the well until a revised permit has been approved that includes an independent third party verification stating as per 250.731(c) that (2) The BOP was designed, tested, and maintained to perform under the maximum environmental and operational conditions anticipated to occur at the well; and (3) The accumulator system has sufficient fluid to operate the BOP system without assistance from the charging system. 8)In the event of BOP system failure or leak you must immediately contact the District Office and receive approval from the District Manager prior to resuming operations. Be advised that a revised permit will be required to capture 3rd party verification that the BOP is fit for service and will operate in the conditions it which it will be used. 9)At the end of this operation, a tree or dry hole tree must be installed and tested for the purpose of monitoring all non-structural casing annuli that are tied back to the						

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surface.

10)Notify the Permitting Section at Least 24 hours in advance of beginning these approved operations AND of any required BOP tests AND of any plug testing or tagging. You MUST NOT proceed with these operations until an inspector can arrive to witness the testing OR the Section Chief or his designee waives the witnessing.

11)Any casing or annuli that fail a pressure/bubble test must be reported and remediated.

12)Notify the Permitting Section at Least 24 hours in advance of beginning these approved operations AND of any required BOP tests.

Correction Narrative

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 WBSs.

Subsurface Safety Valve

Type Installed N/A

Feet below Mudline

Maximum Anticipated Surface Pressure (psi) 735

Shut-In Tubing Pressure (psi) 280

Maximum Anticipated Wellhead Pressure (psi)

Shut-In Wellhead Pressure (psi)

Rig Information

Name	Id	Type	ABS Date	Coast Guard Date
* HYDRAULIC WORKOVER UNIT	47935	Hydraulic Workover	31-DEC-2049	31-DEC-2049

Blowout Preventers

Preventer	Size	Working Pressure	Low	High
Rams	21.25	5000	250	1300
Annular		5000	250	1300
Wireline Luber		5000		1300

Date Commencing Work (mm/dd/yyyy) 05-OCT-2025

Estimated duration of the operation (days) 14

Verbal Approval Information

Official	Date (mm/dd/yyyy)
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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.

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Questions

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B	Is this proposed operation the only lease holding activity for the subject lease? If yes, then comment.	N/A	
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, 13-3/8" casing = 219 psi & 20" Casing = 20 psi
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	

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Questions

Number	Question	Response	Response Text
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	ISS degasser Calc
pdf	Complete Shear Test Report
pdf	Equipment Layout
pdf	Initial Test Schematic
pdf	Sub Test Schematic
pdf	Test Schematic
pdf	Test Procedures
pdf	20in Cmt Diff Analysis Calc
pdf	Irene Snubber Seismic Analysis
pdf	Cement Bond Index, Well Cementing, E.B. Nelson
pdf	Class G Cmt Compressive Strength & Shear Bond Strength
pdf	Procedures
pdf	Well A-14 CER

CONTACTS

Name	Nancy Rodriguez
Company	Freeport-McMoRan Oil & Gas LLC
Phone Number	281-539-7640
E-mail Address	nrodrigu@fmi.com
Contact Description	Aaron Novy

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CONTACTS

Freeport-McMoRan Oil & Gas LLC
979-739-1679
anovy@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	09-OCT-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
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:	Approved. 14-OCT-25

Variance Status:	APPROVED
Variance Type:	Departure
Variance Title:	TA
Regulation Number:	30 CFR 250.1715(a)(6)
Oper. Justification:	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. Note: The 13-3/8" casing pressure will be eliminated via the perforation and circulation method. The 40' milled window in the 9-5/8" casing is to get access to the 13-3/8" casing so the 20" casing annulus can be isolated. The 9-5/8" casing will not be pulled to provide additional stability to the wellbore and the weight of the 21-1/4", 5M Riser and BOPE's. . 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", 133 ppf, X-56 casing is 3,498 psi. The MASP of the well is 1,058 psi,
Variance Date:	

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which is the worst-case exposure to the 20" casing in the event of reservoir repressuring or channeling pressure. 3,498 psi > 1,058 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 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 13-3/8" and 20" casing from surface after the packer and cement are set.

BSEE Decision
Remarks: Approved.
14-OCT-25

Variance Status: APPROVED
Variance Type: Alternate Compliance
Variance Title: TA
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: Approved.
Remarks: 14-OCT-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.
BSEE Decision: Approved.
Remarks: 14-OCT-25

Variance Status: APPROVED
Variance Type: Alternate Compliance
Variance Title: TA

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Oper. Justification: FMOG requests an Alternate Compliance to 30 CFR 250.737(b)(1) and
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side outlet valves.
BSEE Decision: Approved.
Remarks: 14-OCT-25

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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:	08-OCT-25
Review Started:	09-OCT-25
Review Finished:	09-OCT-25
Info Adequate:	Y
Review Remarks:	

Review:	BOP Control System Drawing Review
Sent:	08-OCT-25
Review Started:	09-OCT-25
Review Finished:	09-OCT-25
Info Adequate:	Y
Review Remarks:	

Review:	Determination of NEPA Adequacy
Sent:	30-SEP-25
Review Started:	30-SEP-25
Review Finished:	30-SEP-25
Info Adequate:	Y
Review Remarks:	

Review:	Regional Concurrence Departure Review
Sent:	14-OCT-25
Review Started:	14-OCT-25
Review Finished:	14-OCT-25
Info Adequate:	Y
Review Remarks:	