UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT

NTL No. 2015-N06 Effective Date: Immediately

NATIONAL NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL, GAS, AND SULPHUR LEASES, OUTER CONTINENTAL SHELF

<u>Clarification of Cementing Requirements</u> <u>Following Indications or Identification of an Inadequate Cement Job</u>

This Notice to Lessees and Operators (NTL) provides guidance and clarification of the regulations related to cementing requirements and the steps necessary to address indications or identification of an inadequate cement job.

The Casing and Cementing regulations are found in 30 CFR 250.420-250.428. Section 250.420 provides general casing and cementing requirements. Section 250.421 provides the casing and cementing requirements by type of casing string. Section 250.422(a) provides that "after cementing surface, intermediate, or production casing (or liners), you may resume drilling after cement has been held under pressure for 12 hours." For conductor casing, you may resume drilling "after the cement has been held under pressure for 8 hours." One acceptable method of holding cement under pressure is to use float valves to hold the cement in place. In addition, 30 CFR 250.428 identifies actions that lessees must take in the event that certain casing and cementing situations are encountered, including indications or identification of inadequate cement jobs.

BSEE provides this guidance to clarify that when indications of an inadequate cement job (such as, but not limited to, lost returns, cement channeling, gas cut mud, or failure of equipment, per 30 CFR 250.428(c)) or confirmed inadequate cement jobs (30 CFR 250.428(d)) are encountered, the regulations require that the corresponding responsive action be completed prior to moving forward with drilling or other downhole operations. The standard set by 30 CFR 250.422(a) supplements, but does not replace or obviate, compliance with other casing and cementing requirements. When there are indications of an inadequate cement job, pursuant to 30 CFR 250.428(c), you must "(1) Run a temperature survey; (2) Run a cement evaluation log; or (3) Use a combination of these techniques" to determine whether the cement job meets the requirements of 30 CFR 250.421. If it is determined that the cement job meets the requirements of 30 CFR 250.421, you can proceed to evaluating whether the cement job meets the requirements of 30 CFR 250.422(a).

If it is determined, whether through the above-described analyses or otherwise, that the cement job does not meet the requirements of 30 CFR 250.421, 30 CFR 250.428(d) requires that you either re-cement the well to meet the requirements of 30 CFR 250.421 or obtain approval of other remedial actions from the District Manager prior to resuming drilling or other operations (e.g., completion, abandonment, etc.) Oral approval may be obtained initially from the applicable BSEE district office if appropriate, and then followed up with an official request on an

Application for Permit to Modify (APM) in accordance with 30 CFR 250.465(a). (In Alaska Region, you should obtain approval from the Regional Supervisor of Field Operations). Following satisfactory completion of the identified remedial actions, you can proceed to evaluating whether the cement job meets the requirements of 30 CFR 250.422(a). Completing a successful pressure test pursuant to 30 CFR 250.422(a) is a necessary, but not sufficient, condition prior to resuming drilling or other operations (e.g., completion, abandonment, etc.)

Guidance Document Statement

BSEE issues NTLs as guidance documents in accordance with 30 CFR 250.103 to clarify or provide more detail about certain BSEE regulatory requirements and to outline the information you must provide in your various submittals.

Paperwork Reduction Act of 1995 Statement

The information collection referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR 250, subpart D, Oil and Gas Drilling Operations and an Application for Permit to Modify (APM). The Office of Management and Budget (OMB) has approved the information collection requirements in this regulation and form under OMB Control Numbers 1010-0018 and 1014-0026, respectively. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contacts

For information or questions regarding this NTL, please contact the relevant Regional office as follows:

- Gulf of Mexico OCS Region: Regional Supervisor for District Field Operations at (504) 736-2845.
- Pacific OCS Region: Regional Supervisor for Office of Field Operations at (805) 384-6325.
- Alaska OCS Region: Regional Supervisor of Field Operations at (907) 334-5300.

12/14/15

Douglas Morris

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