



Plug and Abandonment

Guidelines, Challenges, the Future
May 8, 2015

“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”

Overview

- Regulatory Distinction
 - TA vs PA, etc.
- Upcoming Revisions
- Departure/Alternate Compliance
- Regulations Going Forward

Classifications

- Zonal Isolation
 - Defined by NTL 2010-G05
 - Well isolated downhole without further barriers (1715(a)(1),(a)(2), or (a)(3))
 - May be left in this condition for two years
 - Requires Alternate Compliance, if applicable

Classifications

- Temporary Abandonment
 - Governed by 30 CFR 250.1721
 - Must meet all of 1715 minus 1715(a)(8)
 - 100' surface plug must be placed within 1000' of mud line
 - Annular isolation still required per 1715(a)(6)

Classifications

- Permanent Abandonment
 - Must abide by 1715
 - Casing cut 15' BML unless below 800 m (2624 feet)
 - All zones must be plugged as per regulation or with District Manager approval
 - All annuli must be isolated

Upcoming Changes

- 30 CFR 1715(a)(3)(iii)(B)
 - Confusion due to outdated wording
 - (B) refers to casing bridge plug
 - (E) refers to tubing bridge plug
 - (A),(B),(C) original PA regulation
 - (D),(E) added to accommodate tubing left in hole
 - Regulation (B) will be written to refer to “casing bridge plug” when practical

Regulatory Deviations

- Alternate Compliance
 - Allows operator to meet the “intent” of regulation
 - Require PE certification to read as above.
 - Example: Program meets intent of 1721, etc.
 - Granted at District level

Regulatory Deviations

○ Departure

- Requested when operator cannot meet regulation
 - Example: Deepwater casing annulus lacks 200' of cement
- PE certification must read “cannot meet” regulation
- Granted, rarely, at the Regional level

Going Forward

- Annular isolation
 - Balanced cement plugs (“Horse collar”)
 - Potential for filter cake on casing
 - Hole cleaning
 - Quality of isolation?

Going Forward

- Annular isolation
 - Deep Penetration (DP) guns
 - Effectiveness?
 - Testing?
 - Quality of cement job

Going Forward

- Annular isolation

- Deepwater

- No monitoring of outer annuli

- Mud line hanger wells without annular mechanical barriers

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