“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- Confusion due to outdated wording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?
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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