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Bureau of Ocean Energy Management,
Regulation and Enforcement

UNITED STATES DEPARTMENT OF THE INTERIOR

Technical Permitting Workshop

Containment Plans

August 30, 2011

by Bryan Domangue



NTL 2010-N10 Containment: Common Submittal Errors

- Not providing the Houma District with a hard copy of the containment plan.

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NTL 2010-N10 Containment: Common Submittal Errors

- Inconsistency between operator divisions/business units in submitting plans.

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NTL 2010-N10 Containment: Common Submittal Errors

- Not providing the most up to date BOEMRE recognized plan, and/or responsible party checklist, and/or exhibits.
 - MWCC – latest recognized functional spec is Rev. 3
 - HWCG – latest recognized base plan is Rev. 1

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NTL 2010-N10 Containment: Common Submittal Errors

- (HWCG) Not providing a signature for who (internal to the operating company) has approved the plan. The plan has a signature location on the cover page.
- (MWCC) Operators have failed to submit the “MWCC Certification Statement”, Exhibit J

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NTL 2010-N10 Containment: Common Submittal Errors

- Not providing a operator/well specific response PFD (Process Flow Diagram). Each plan should include a PFD that is specific to each operators' response capability. The generic version provided by MWCC and HWCG should be updated to be company specific.

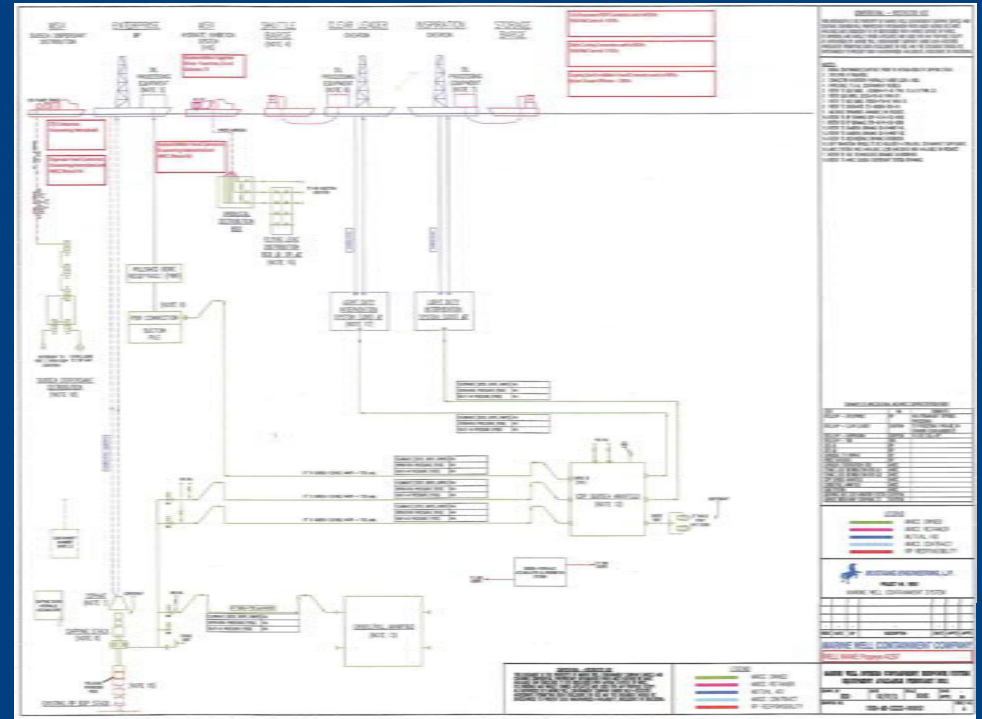
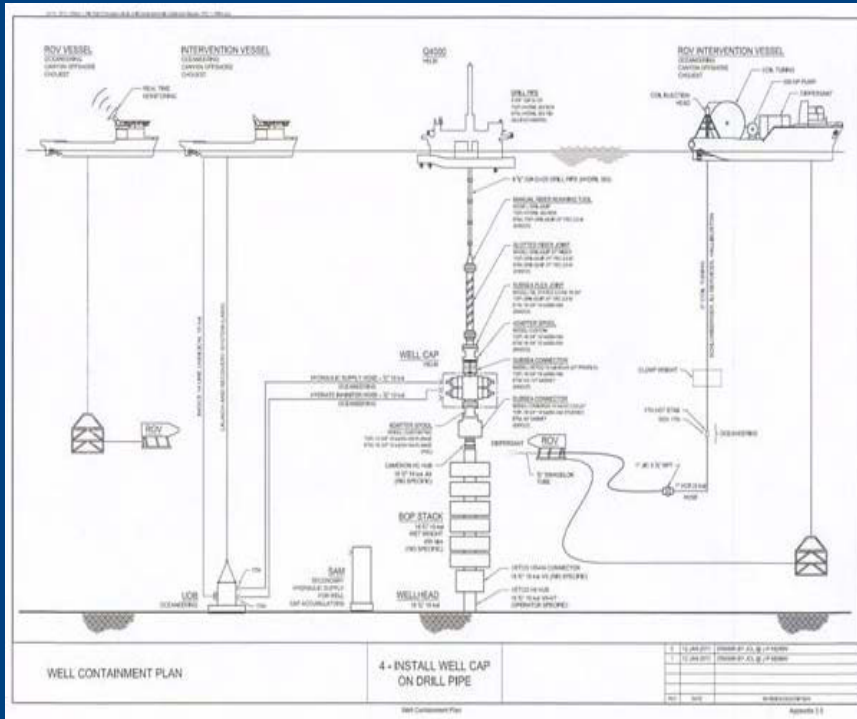
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- Not specifying pressure ratings for all capping stack connectors. Internal to all plans is a “Capping Stack Connector/Transition Summary”. This document needs to specify the pressure ratings for all connectors.
- General failure to consider the possibility of a hydraulic connector release mechanism failure. We have seen an unwillingness to consider mechanical un-bolting of a flex joint connector.

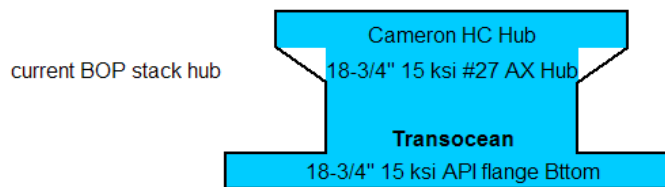
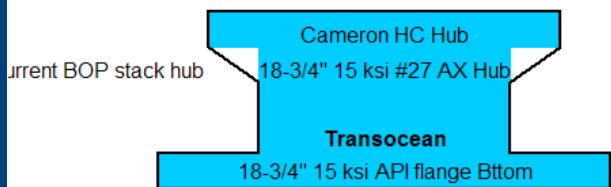
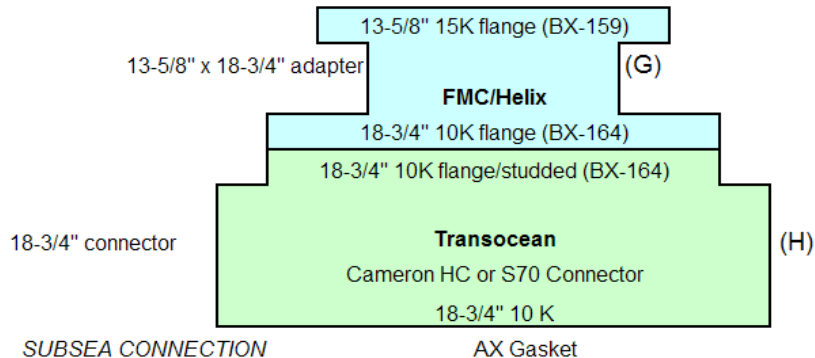
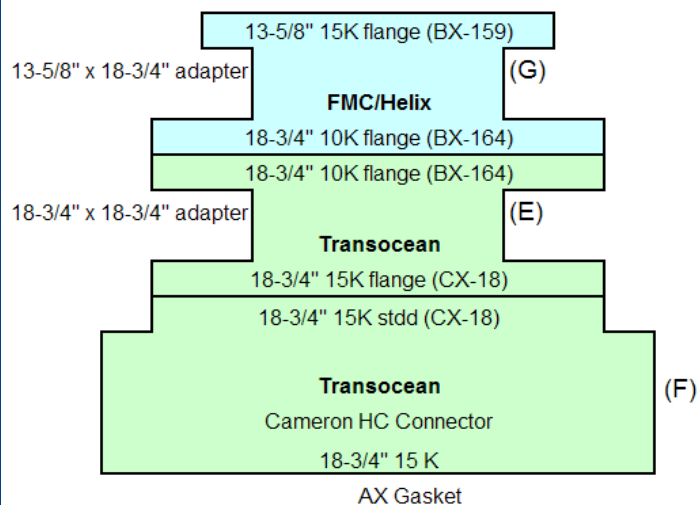
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- Failing to invest the time into generating and/or researching the specific procedures to perform a manual disconnect of the BOP and/or LMRP, or specialty connectors for risers associated with Spars/TLPs.
- Failure to provide documentation to justify Spar/TLP survivability.

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NTL 2010-N10 Containment: Cap and Flow Update

- All plan approvals to date have been “cap only”.
- Currently working with members of HWCG and MWCC on two wells regarding a cap and flow option.

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NTL 2010-N10 Containment: Cap and Flow Update

- Currently using our internal WCD model to determine a safe flowing pressure at the mud line that will prevent collapse, burst, and/or broach.
- This flowing pressure must then be modeled in the free water column and across the production process plant to ensure that no bottlenecks exist that would result in raising the flowing well head pressure above the safe limit.

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Thank you

