Comments to the proposed rule RIN 1010-AC96: Minimum Blowout Prevention (BOP) System Requirements for Well-Workover Operations Performed Using Coiled Tubing With the Production Tree in Place

RULES PROCESSING TEAM

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Sec. 250.615 Blowout prevention equipment.

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(e) For coiled tubing operations with the production tree in place, you must meet the following minimum requirements for the BOP system:

(1) Surface BOP system components must be in the following order from the top down:

According to the proposed text, the blind-shear rams are required to be the lower most rams. If we option to place a set of dual combination rams below a flow cross, it would be a preference to have the pipe-slip combination ram as the lower most ram to enable holding the cut coiled tubing. From the provided text, it may stand to reason that the primary objective is to have a blind-shear ram configuration as part of the BOP system and the sequential order is of less importance.

(5) You must have a kill line and a separate choke line. You must equip each line with two full-opening valves. One of the full-opening valves on each line must be a remotely controlled valve, and the other valve must be a manual valve. The valves must have a working pressure rating equal to or greater than the working pressure rating of the connection to which they are attached, and you must connect them to the well control stack. For operations with expected surface pressure of 3,500 psi or greater, the kill line must be connected to a pump.

The placement of the two full opening valves is vague and left to interpretation. Connecting the valves to the well control stack could be accomplished by either directly to the stack or with 30 feet of connection line. A check valve in the kill line might need to be considered as a component requirement.

(7) All connections used in the surface BOP system must be flanged.

Lubricator sections are normally acceptable pressure containment devices and employ quick connections as end connections. Is the placement of lubricator below the stripper well control component and above the Quad Ram functions an acceptable configuration?

Sec. 250.616 Blowout preventer system testing, records, and drills.

(2) Ram-type BOPs, related control equipment, including the choke and kill manifolds, and safety valves must be successfully tested to the rated working pressure of the BOP equipment or as otherwise approved by the District Manager. Variable bore rams must be pressure-tested against all sizes of drill pipe in the well excluding drill collars. Surface BOP systems must be pressure tested with water. The annular-type BOP must be successfully tested at 70 percent of its rated working pressure or as otherwise approved by the District Manager.

There could be some confusion regarding the pressure test amount for the stripper well components. Are stripper well components classified as related control equipment?

(f) You must record test pressures during BOP tests on a pressure chart, or with a digital recorder, unless otherwise approved by the District Manager. The test interval for each BOP system component must be 5 minutes, except for coiled tubing, which must be for 10 minutes.

There could be some confusion regarding the test period. Is the coiled tubing pipe the only 10 minute test interval and the rest of the BOP system components a 5 minute test interval requirement?

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