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*****FAX***** page 1 of 2
 September 15, 1997

S.D. McCoy
 1370 H Plaza Office Building
 Bartlesville Oklahoma 74004
 918-661-8456
 918-661-8143 Fax
 e-Mail admccoy@bvenx.poco.com

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Engineering and Technology Division
 MS 4700
 Minerals Management Service
 381 Eiden Street
 Herndon, Virginia 20170-4817
 Fax No. 703-787-1555

Attention: William S. Hauser

Re: BOP Study Results and MMS Workshop-Comments

Phillips Petroleum Company has reviewed the MMS Regulation proposal and offers the following comments for MMS consideration in preparation of the final rule.

TEST PRESSURES- Comment

We have reviewed a few of the methods to calculate the Maximum Anticipated Surface Pressure. Due to the variety of methods that operators can use to calculate a MASP, it is suggested that these calculations NOT be the basis for establishing the test pressure for BOP equipment.

For drilling operations, MMS currently has a method to calculate a MASP to determine a BOPE test pressure, based on fracture gradient at the casing shoe and a gas gradient, and a second method using BHP, a 70% gas gradient and a 30% mud gradient. For completion operations the MASP calculations, based on a gas column and BHP are different than those for drilling.

If MMS proposes to pursue a "standard" method of calculating MASP for BOP test purposes only, then an industry review and general consensus should be considered before final inclusion in the rule. Two separate methods for calculating Drilling MASP and Completion MASP will be required.

It is recommended that the current system of addressing the MASP and BOP test pressures in the APD be maintained.

PLAIN ENGLISH - Comment

The plain english is acceptable.

250.57 D-4.

We assume that the intent of this section of the proposed rule is to capture the blind or blind/shear rams separately. Suggest adding "provided same are not routinely tested during the 14 day pressure test.

250.57 D-8.

Please define a casing safety valve. From our interpretation, what is meant here is to actuate the a valve installed on a casing swage to facilitate circulation while running casing.

Drilling Operations - Crew Drills

Nothing is stated regarding Weekly drills by the drilling crews under 250.57. Weekly drills are required under Section 250.86.


S.D. McCoy
Phillips Petroleum Company

cc: N.P. Omsberg(r) J.R. Soybel - Houston
L.H. Hoover III - Lafayette
S.A. Siemens