

**MAK 0 6 2002**

**ExxonMobil**  
*Production*

March 6, 2002

Advanced Notice of Proposed Rulemaking  
30 CFR Part 250  
Procedures for Dealing with Sustained  
Casing Pressure  
Federal Register, November 9, 2001

Department of the Interior  
Minerals Management Service MS 4024  
381 Elden Street  
Herndon, Virginia 20170-4817

Attn: Rules Processing Team (MS 4024)

Gentlemen:

ExxonMobil Production Company is pleased to comment on the subject Advanced Notice of Proposal Rulemaking (ANPR) published in the Federal Register on November 9, 2001. ExxonMobil actively participated in the preparation of comments submitted by the Offshore Operations Committee (OOC) and urges you to fully consider the OOC comments, including the proposal to pursue a technical and risked-based approach to address the issues associated with sustained casing pressure (SCP).

This rulemaking goes far beyond placing into the regulations the current regulatory procedures for maintaining and record keeping for wells with SCP. It is not apparent how the MMS, in developing this ANPR, can interpret the current requirements of 30 CFR 250.517 (c) to mean that no SCP can be maintained on any OCS well. As the MMS notes in the preamble, the existing policy and procedures of addressing and operating wells with SCP have served both industry and MMS well since being initiated. Accordingly, the need to significantly alter this process is unclear and appears to be unwarranted.

Additionally, the change from existing MMS policy regarding subsea completions to the new requirement that subsea wells installed after January 1, 2005 have a method for monitoring all casing annuli for SCP, is particularly burdensome, in that it requires new technology to be developed in a short time frame. Furthermore, this requirement raises concerns associated with the safety and reliability risks of a new concept that is unproven and seemingly unnecessary. In addition, the estimated incremental cost to install this technology is substantial (\$750K to \$1,000K per well).

Since no highly reliable, safe and cost effective means of monitoring SCP in all annuli has been developed, the application or development of any potential methods to address the monitoring of subsea wells for SCP is of great concern. . Potential methods for monitoring subsea completion for SCP, along with concerns associated with each option are as follows:

1. Non-Intrusive method concerns (This method preserves the overall pressure integrity of the well system):
  - Substantial new product development required
  - Significant investment in time and resources required
  - Viable solution not guaranteed
  - Must be very accurate
  - May also require intrusive system for diagnostics purposes.
2. Vertical Intrusive method concerns (This method works through packoffs and hangers internal to the subsea wellhead):
  - Well environment (mud, cement, gumbo, hydrates, etc.) enhances plugging potential
  - Monitoring ports provided are susceptible to plugging
  - Internal connection between BOP or tree susceptible to damage(Alignment of heavy equipment to effect connection is an issue)
  - Alignment between wellhead and BOP becomes necessary to align critical elements and MODU's are not equipped to rotate riser for alignment
  - Ports may have to reseal (with sliding sleeves or similar) when BOP or tree is removed so wellhead pressure integrity is maintained for workovers.
  - Damage to internal connection(s) cannot be repaired and may provide leak paths to the environment when tree or BOP removed
  - Wellhead housing size may increase requiring larger and heavier connectors on all BOPs and subsea trees
  - Additional valves needed on the tree to isolate annuli
3. Horizontal Intrusive method concerns (This is achieved through penetrations in the wellhead):
  - Not consistent with current API Spec 17 D Paragraph 1001.5b(1)(c), which states that "body penetrations within the [high pressure wellhead] housing is not permitted."
  - Wellhead housing size may increase (taller, heavier, larger) requiring larger rotaries or installation of the wellhead in the moonpool area
  - Potential for plugging monitoring ports during and after well construction is possible.
  - Well environment enhances plugging potential (mud, cement, gumbo, hydrates, etc.)
  - Ports located near the trash hole increases the chances of plugging

- No way to determine if the ports are plugged until after all completion hardware is set.
- Additional valves required to isolate annuli
- Failure of valves due to long shut in time between exploration and production
- Plugging of valves due to bleeding fluid possible if casing shoe not cemented and hydrocarbons enter the annuli over time.
- No easy way to recover valves or actuators and repair
- Installation risk to valves and actuators during well construction
- Cathodic protection of valves and actuators

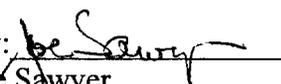
In addition, all of the above options raise concerns due to the complexity of the system creating operational issues including the difficulty and time necessary to bring wells on line and to shut down wells for a workover or during an emergency shut-in. As stated previously, these monitoring and operational concerns also carry substantial safety / reliability risks, such as:

1. Implementation of an active mitigation system to monitor/vent all annuli could compromise the integrity of a proven conventional subsea wellhead and tree system by adding complexity and more leak paths.
2. Some components used in the system may not be recoverable for repair
3. The placement of valves on the wellhead which may remain dormant for long periods of time and may not be operable when needed without a regular maintenance program(e.g., ROV functioning on a periodic basis)
4. Potential plugging of ports in the subsea wellhead during cementing operations (e.g., well construction phase) and during bleeding of annuli while producing the wells (e.g., operations phase).
5. Potential of damage to the system components during installation

In summary, it is recommended that the MMS withdraw or suspend this rulemaking activity and pursue a technical risk-based approach to the sustained casing pressure issue, instead of the highly prescriptive regulatory approach of the subject ANPR.

If you have any questions or need additional information, please contact Mr. Steve Brooks at 504-561-4753 or Mr. Steve Ledet at 504-561-4824.

Sincerely,

By:   
 Joe Sawyer  
 Manager  
 R/S/O Compliance  
 ExxonMobil Production Company  
 (a division of Exxon Mobil Corporation)