

Proposed section	OOC comments	OOC rationale	MMS response
250.414 (a), (b), (d), (e), (f) and (g).	Clarity is requested for lines (a), (b), (d), (e), (f) and (g)—What items must my drilling prognosis include? (a) Projected plans for coring at specified depths; (b) Projected plans for logging; (d) Estimated depths to the top of significant marker formations; (e) Estimated depths to significant porous and permeable zones containing fresh water, oil, gas, or abnormally pressured formation fluids; (f) Estimated depths to <i>major</i> faults; and (g) Estimated depths of permafrost, if applicable.	Currently the majority this of data is captured in the APD Information Spreadsheet. However, will the proposed form MMS-123S include other required data, such as estimated depths to the top of significant marker formations, major faults, etc? OOC assumes that the intent of the requirement is to identify faults that can potentially lead to problems while drilling. Therefore, it is recommended that the language be modified to include major faults only.	With the exception of providing the estimated depths to faults, these requirements were contained in § 250.415(f)(5) of the current regulations. You may use form MMS-123S to provide as much of this information as appropriate. Information you do not include on that form must be included with the drilling prognosis. As for estimating the depths to faults, we made the suggested change to require only the estimated depths to major faults.
250.415(a)	Hole sizes and casing sizes, including: weights; grades; [tension] collapse, and burst values; types of connection; and setting depths (measured and TVD).	The requirement for including the tension value has been deleted from the proposed language. This information has not been required in the past. The need to now require this information is unclear. If this requirement remains, will the ADP Information Spreadsheet/form MMS-123S, be revised to capture these values?	We made this suggested change. We will continue to require the tension casing design safety factor which is covered in paragraph (b).
250.417(a)	(a) If sufficient environmental information and data are not available, the District Supervisor may require you to collect and report this information <i>during the period of operation. The information to be collected and reported will be related to the structural integrity of the drilling unit and the safe conduct of operations.</i>	Clarity. The proposed language is too broad and does not present under which conditions the additional data would be required.	We added the phrase “during operations” to the requirement as suggested. We did not add the second sentence because it is unnecessary. The context of the section sets the limits for the type of information to be collected.
250.417(b)	(b) The District Supervisor may require you to conduct additional surveys and soil borings before approving the APD, <i>if the District Supervisor cannot make a determination that the proposed drilling unit can be supported at the specific site.</i>	Clarity. The proposed language is too broad and does not present under which conditions the additional data would be required.	The sentence was revised as follows: The District Supervisor may require you to conduct additional surveys and soil borings before approving the APD if additional information is needed to make a determination that the conditions are capable of supporting the drilling unit.
250.420(b)(1)	(b) Casing Requirements. (1) You must design casing (including liners) to withstand the anticipated stresses imposed by tensile, compressive, and buckling loads; burst and collapse pressures; thermal effects; and combinations thereof].	OOC recommends that the phrase “and combinations thereof” be deleted because this statement is vague as to what combinations must be considered.	We did not make the suggested change. This is not a new requirement (currently in § 250.404(a)(3)). You must design casing to withstand all combinations.
250.420(b)(2)	(2) The casing design must include safety measures that ensure well control during drilling [and safe operations during the life of the well].	OOC recommends that the phrase “and safe operations during the life of the well” be deleted because it is too broad.	We did not make the suggested change. You must design your casing for the life of the well.
250.421(b)	(b) Use enough cement to fill the annular space back to the mud line. Verify annular fill by observing cement returns. If you cannot observe cement returns, use additional cement to ensure fill back to the mud line. <i>Excess cement may be washed out from the annulus below the mud line to a sufficient depth as necessary to facilitate well abandonment operations.</i> For drilling * * *	Cement in the annular area between the conductor and the drive/structural pipe can cause difficulty in cutting pipe and clearing the location below the mud line.	We did not make this suggested change. Washing out or displacing cement is covered by § 250.418(g). That paragraph now says that washing out cement must be addressed in the APD.