

Proposed section	OOC comments	OOC rationale	MMS response
250.421(f)	If you use a liner as conductor or surface casing, you must set the top of the liner at least 200 feet above the previous casing/liner shoe. If you use a liner as an intermediate or production casing, you must set the top of the liner at least 100 feet above the previous casing shoe, <i>unless otherwise approved by the District Supervisor.</i>	It is common practice to achieve the liner-lap lengths discussed herein. However, there are instances when this is undesirable and, in those cases, a liner top packer is typically installed to ensure a good seal. The recommended language change will provide the District Supervisor the flexibility to approve a shorter liner-lap.	We did not make the suggested change of adding "unless otherwise approved by the District Supervisor." In fact, we have removed that phrase from many sections because it is unnecessary. The District Supervisor has the flexibility to approve many requests without that phrase in the regulations. To emphasize this flexibility, we have added to the drilling regulations two sections: § 250.408, "May I use alternative procedures or equipment during drilling operations?", and § 250.409, "May I obtain departures from these drilling requirements?"
250.421(f)	* * * If you use a liner as an intermediate or production casing, you must set the top of the liner at least 100 feet above the previous casing shoe.	Existing regulations include language that prohibits the use of a production liner when landed in a surface casing. Is this no longer the case?.	We have revised this paragraph to read "If you use a liner as an intermediate string below a surface string or production casing below an intermediate string, you must set the top of the liner at least 100 feet above the previous casing shoe." MMS does not allow production liner to be set inside the surface casing, thereby to be used for production except in very limited conditions. Each such liner set departure must be individually reviewed.
250.422(b)	When may I resume drilling after cementing? * * * (b) If you plan to nipple down your diverter or BOP stack during the 8- or 12-hour waiting time, you must determine, [in advance] when it will be safe to conduct this activity. Your determination must be <i>based on a knowledge of formations conditions encountered, presence of potential drilling hazards, actual well conditions while drilling, cementing and post cementing as well as past experience.</i>	The term "in advance" in the proposed text is very vague. We recommend it be removed and the actual information necessary to make the determination be stated. However, we do agree that the performance-based language as written in § 250.422(b) is appropriate. That is, making the operator responsible for assessing when it is safe to nipple down well control equipment. As a prudent operator, this assessment is made based on a knowledge of formations conditions encountered, presence of potential drilling hazards, actual well conditions while drilling, cementing and post cementing as well as past experience.	We made the following changes to this requirement: We replaced the phrase "in advance" with "before nipping down" because we wanted to ensure that no one made the determination after nipping down. We revised the last sentence of the requirement to include most of the wording suggested.
250.423(b)	(b) Change casing setting depths more than 100 feet TVD from the approved APD.	It is recommended that approval be obtained if the casing depth change is more than 100 feet TVD, not measured depth. Additionally, if the casing becomes stuck while running or other hole conditions prevent the running of casing to the projected setting depth, the operator should be allowed to cement the casing without seeking approval, and notify the District Supervisor subsequently.	We changed this paragraph to allow an increase of casing setting depth of up to 100 feet total vertical depth before requiring a submittal to the District Supervisor. In the case where the casing setting depth fell short of the planned depth, you would have to contact the District Supervisor only if the well conditions warranted revising your casing design (see § 250.423(a)).
250.423(h)	Submit geologic data and information to the District Supervisor that demonstrates the absence of shallow hydrocarbons or hazards. This information must include logging, [and] drilling fluid-monitoring <i>and other available geologic data</i> from wells previously drilled [within 500 feet] <i>in the immediate vicinity</i> of the proposed well path down to the next casing point.	The 500-foot limit is too prescriptive. This waiver should be based on the geologic data from an applicable analogous well.	We did not make the suggested change. The 500-foot distance was selected by MMS geologists and drilling engineers as a reasonable distance. MMS can best serve the industry by keeping the 500-foot distance in the regulations (see § 250.428(g)).