

Proposed section	OOC comments	OOC rationale	MMS response
250.450(g)	(g) After drilling is completed, [retain all the records listed in this section for 2 years at the facility, at the lessee's field office nearest to the facility, or at another location conveniently available to the District Supervisor.] <i>the lessee must retain all the records listed in this section for 2 years and make them available at the District Supervisor's request.</i>	To require the lessee to maintain detailed drilling records at the facility or at the nearest field office nearest field location after drilling operations are completed is unreasonable, and places an unnecessary record-keeping burden on the operator. We do not maintain these records; however, they are typically maintained in a central record center. The need to maintain test results in the field after the drill operations are completed is unclear. Should the need to review these records arise, they can be supplied at that time.	We deleted paragraph (g) and moved the record-keeping requirements to §§ 250.466 and 250.467. See previous discussion on § 250.434.
250.457(a)	(a) You must have and maintain drilling fluid-testing equipment on the drilling rig at all times. You must test the drilling fluid, when circulating at least once each tour or more frequently if conditions warrant. You must perform the tests according to industry-accepted practices. Tests must include density, viscosity, and gel strength; hydrogenion concentration; filtration; and any other tests the District Supervisor requires <i>for monitoring and maintaining drilling fluid quality for safe operations, prevention of downhole equipment problems and for the detection of kicks.</i> You must record * * *.	There are many times on a rig when circulation does not occur during a tour, or longer, and testing twice per day (once each tour) has no added value. Therefore, we recommend that this be a requirement during circulation only. Furthermore, the proposed text is too broad in regards to what type and why might the District Supervisor require additional test. The recommended language is consistent with the existing requirements.	We agree with the comment and moved the paragraph to become § 250.456(i). The new paragraph says: "When circulating, you must test the drilling fluid at least once each tour or more frequently if conditions warrant. You tests must conform to industry-accepted practices and include density, viscosity, and gel and gel strength; hydrogenion concentration; filtration; and any other tests the District Supervisor requires for monitoring drilling fluid quality, prevention of downhole equipment problems and for kick detection. You must record"
250.460(a)	Clarity requested	The proposed language is confusing. The title of this section is "What are the requirements for well testing?" However, paragraph (a) discusses determining formation characteristics using formation fluid samples and logging. It seems appropriate to put this paragraph in a section titled "what type samples, survey and tests of the formation are required." Please refer to 30 CFR 250.401(e) in the existing regulations.	We agree with the comment that the two paragraphs don't fit under this title. We moved paragraph (a) to its own section (now § 250.407 "What tests must I conduct to determine reservoir characteristics?") under general requirements. We then re-titled this section "What are the requirements for conducting a well test?"
250.461(a)	(a) Survey requirements for a vertical well: (1) You must conduct inclination surveys on each vertical well and [digitally] record the results. Survey intervals may not exceed 1,000 feet during the normal course of drilling. (2) You must also conduct a directional survey that provides both inclination and azimuth, <i>and digitally record the results in electronic format:</i>	Digitally recording inclination surveys while drilling a vertical well is not necessary or practical. Inclination surveys are used as a process control check to ensure that the well remains near vertical. The subsequent surveys, which include both inclination and azimuth, can be digitally recorded in electronic format. The phrase "electronic format" has been add to clarify that the record should be stored electronically for submittal to MMS, not record as "fingers" on a paper copy.	We made the suggested changes.
250.461(e)	(e) If you drill within 500 feet of an adjacent lease, the Regional Supervisor may require you to furnish a copy of the well's directional survey to the affected leaseholder, <i>if the leaseholder has requested the survey.</i>	The adjacent leaseholder should request the survey.	We revised the paragraph by adding the following sentence: "This could occur when the adjoining leaseholder requests a copy of the survey for the protection of correlative rights."
250.462(d)	(d) MMS ordered drill. An MMS authorized representative. The MMS representative will consult with <i>your onsite representative</i> before requiring the drill.	Clarifies who will be consulted prior to conducting the drill.	We made the suggested change.