



30CFR250 Subpart G Proposed Rule Changes – AADE

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Agenda

Why are Changes to the Rule Being Proposed?

General Comments

Discussion of high Impact changes

- BAVO

- Shearing

- Well Compatibility

- Real-time monitoring

- ROV Requirements

- Dedicated Accumulator Capacity

- Other Changes

Questions?



Why are Changes to the Rule Being Proposed?

March 28, 2017 – U.S. President Trump issued Executive Order 13783 which is titled Promoting Energy Independence and Economic Growth (82 FR 16093).

April 28, 2017 - The President issued Executive Order 13795 called Implementing an America-First Offshore Energy Strategy (82 FR 20815). As part of its response to Executive Orders 13783 and 13795, and Secretary's Order Number 3350, the BSEE reviewed the well control rule (WCR) (§30CFR250 Subpart G) and is proposing revisions to the WCR that **could reduce unnecessary burdens** on industry **without impacting** key provisions in the rule that have a significant impact on improving **safety** and equipment reliability.

General Comments

The information presented in this document is still under development and may change.

Most of what is proposed is **rolling back** and clarifying regulations, not adding new regulations.

The proposed rule changes are more **in alignment with Standard 53**.

Documents incorporated by reference will be updated.

There are various clarifications on wording not mentioned in this presentation. The goal of the presentation is to capture **major** proposed changes, not **all** changes.

The rule changes are expected to be published in the federal register shortly, and there will likely be a reduced (30 day) comment period.

§250.732(a) BSEE Approved Verification Organization (BAVO)

All references to BAVO are likely to be replaced with Independent 3rd Party (I3P) as defined in 732(a)(2). I.E **Bye bye BAVO.**

Well Compatibility Verifications per §250.731(c), Shear Verifications per §250.732(b), Statements of Fact per §250.738(b)(4),(i),(m) and (o), and 5-year major inspection reports per §250.739(b), and HPHT reports per §250.732(c) are proposed to still be required.

The I3P will **not be required to be present** at 5 year major inspection, but will be required to review the results (documentation).

The Mechanical Integrity Assessment (MIA) is proposed to be **removed.**

§250.732, §250.734 Shearing

Removal of the requirement for a shear ram **centering mechanism** per §250.734(a)(16)(i) and subsequent verification in §250.732(b)(1)(iv).

Removal of the ability to **mitigate compression** between shear rams per §250.734(a)(16)(ii) is proposed to be removed.

Proposal to revise the hold time of a sealing test after shearing to **5 minutes from 30 minutes** as stated in §250.732(b)(2)(ii).

Proposed changes to §250.734(a)(1)(ii) to add clarification that a **“combination of the”** shear rams must be capable of shearing all items listed in this section. I.e. Casing rams don't have to shear wire and blind shears don't have to shear casing.

§250.731 (c),(d) Well Compatibility Verification

§250.731(d)(1) and (3) are proposed to be removed since they are considered redundant. §250.731(d)(2) is proposed **to be moved to §250.731(c)**.

(d) Additional certification by a BAVO, if you use a subsea BOP, a BOP in an HPHT environment as defined in §250.807, or a surface BOP on a floating facility, Verification that:

- (1) The BOP stack is designed and suitable for the specific equipment on the rig and for the specific well design;**
- (2) The BOP stack has not been compromised or damaged from previous service; and**
- (3) The BOP stack will operate in the conditions in which it will be used.**

§250.724 Real-Time Monitoring (RTM)

Real-Time Monitoring is expected to **still be required**.

RTM requirements are expected to be **more performance-based** rather than prescriptive.

The performance will likely include independent, automatic and continuous monitoring and recording, storing and transmitting data of the BOP control system, fluid handling system, and downhole conditions (if tools are installed).

§250.734(a)(3) ROV and Accumulator Capacity

Proposed changes to §250.734(a)(3)(ii) includes **high flow rate ROV's can now be used** as well as flying leads to meet the closing time requirements of Standard 53.

The requirement of §250.734(a)(4) ROV **open functions** for each shear ram, ram locks and one pipe ram are **proposed to be removed**.

737(d)(4)(v) is proposed to verify closure through ROV hot stab through a **1,000 psi test for 5 min**.

The requirement of “**dedicated**” accumulator capacity subsea per §250.734(a)(3)(iii) for deadman and autoshear is proposed to be **removed**.

Other items of Interest (1 of 2)

Alternate cutting devices per §250.733(a)(1) will likely remain an option for shearing wireline, slickline until surface shear rams can be upgraded.

Align dates of **surface and subsea BOP stack configuration** requirements to be identical.

New paragraph §250.733(e) will clarify the minimum BOP system requirements for completion, workover and decommissioning operations where estimated **well pressures are low**.

Clarification added that subsea testing must **begin** within 30 days of stump test

Other items of Interest (2 of 2)

§250.737(d)(12)(iv), **deadman testing on the seafloor**, is proposed to change from monitoring discharge pressures of the subsea accumulator system **throughout the test** to at **end of test**.

§250.737(d)(12)(vi), **pressure testing blind shear rams after deadman test** will recommend a 1000 psi test for 5 min to verify closure.

BOP pressure testing frequency is still being debated (7, 14, 21 days?).

Coiled tubing moved from §250.616 and §250.1706 to §250.750.

Questions ??

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