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Sent: Mon Jan 18 18:19:46 2010

To: Douglas, Scherie D; Halverson, Teri; Mix, Kurt; Shanks, Forrest E (DTC International)

Subject: Updated: High Pressure drilling risers

Importance: Normal

Attachments: High Pressure 2RD 11-17-09.doc; Draft Policy Completion Case MASP 11-18-09.doc

I will be at two OOC meetings tomorrow where Mike Connor and Russell Hoshman will be speaking and answering questions about high pressure drilling risers and MASP (notes and attachments below). I would like a few minutes of your time if possible today to get an update on what we have already communicated to MMS and any questions or comments I should be prepared to present. Thanks in advance.

A) Drilling Risers

High pressure drilling risers. Wells are being drilled from SPARs and TLPs using surface BOP's and high pressure drilling risers in up to 8000' of water. The MMS is trying to understand the risk of drilling wells with surface BOP's and high pressure drilling risers relative to drilling the same wells with subsea BOP's and a low pressure drilling riser or drilling the same well with a surface BOP, high pressure drilling riser and a mudline isolation device. When ever a DWOP is submitted, we are asking for a risk assessment before we approve of drilling with a surface BOP and high pressure drilling riser. Since we have started this, one DWOP was approved to drill with a high pressure drilling riser and the other was approved for a high pressure drilling riser but a mudline isolation device was required. Policies that are being considered are the following:

1. When is a mudline isolation device required when drilling with a surface BOP and high pressure drilling riser? (no draft yet but a hot topic with Lars) 2. Inspection requirements for a high pressure drilling riser with a surface BOP.

D) Maximum anticipated surface pressure (MASP)

The MMS is currently seeing Drilling and Completion request in deep water where the operating company is using an oil gradient in there calculation for determining the maximum anticipated surface pressure (MASP). They are doing this to keep their MASP below 15,000 psig because subsea equipment with a pressure rating above 15,000 psig currently does not exist. The MMS is drafting a policy to define when must an gas gradient be used when calculating the MASP and when may an oil gradient be used. The policy will also address how must the MASP for the completion case be calculated.

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