

**UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE
GULF OF MEXICO OCS REGION**

NTL No. 2007-G08

Effective Date: April 2, 2007

**NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL AND GAS LEASES IN THE
OUTER CONTINENTAL SHELF, GULF OF MEXICO OCS REGION**

**Using a Motion Compensator when Conducting
Coiled Tubing Operations on a Floating Production Platform**

This Notice to Lessees and Operators (NTL) is issued pursuant to 30 CFR 250.103. It establishes procedures for ensuring well control when you conduct coiled tubing operations on a floating production platform or other floating vessel.

The Minerals Management Service (MMS) regulation at 30 CFR 250.615(a) regarding oil and gas well workover operations states that “The blowout preventer (BOP) system, system components and related well-control equipment shall be designed, used, maintained, and tested in a manner necessary to assure well control in foreseeable conditions and circumstances, including subfreezing conditions.”

There may be relative motion between the surface wellhead of a hybrid well (dry tree well with a subsea wellhead on the seafloor) and a floating production platform. This motion can be less than one inch or as much as several inches and may have a short period or long period, or be a combination of motions. The motion may vary according to tides, winds, currents, and sea state. The wellhead angle relative to the floating production platform also may change over the same period. When this motion occurs over a long period, it is not obvious.

For coiled tubing operations, relative motion as small as one inch could result in significant tension/compression/bending forces in the BOP components between the wellhead and the coiled tubing injector head. These forces could contribute to a failure of the BOP system during coiled tubing operations and could result in a loss of well control. These BOP components are not considered structural components but are pressure-containing bodies.

To address the concerns that such failures might occur when you conduct coiled tubing operations on a floating production platform or other floating vessel,

1. Use a motion compensator or other similar devices in the coiled tubing rig up, and
2. Evaluate your procedures and hardware before you begin actual work to prevent tension/compression/bending forces in the BOP components between the surface wellhead and the coiled tubing injector head, resulting from the motion between the wellhead and the floating production platform or other floating vessel.

Paperwork Reduction Act of 1995 Statement

The information collection referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR 250, Subpart F, Oil and Gas Well-Workover Operations. The Office of Management and Budget (OMB) has approved the information collection requirements in these regulations under OMB Control Number 1010-0043. This NTL does not impose additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contact

Please contact Mr. Russell Hoshman by e-mail at russell.hoshman@mms.gov or by telephone at (504) 736-2627, or send inquires to the Minerals Management Service, Technical Assessment and Operations Support Section (MS 5220), 1201 Elmwood Park Blvd., New Orleans, Louisiana 70123-2394 with any questions regarding this NTL.

[original signed – Michael Prendergast]

For Lars T. Herbst
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