

Comments on Regulatory notice 30 CFR 250.807

The condition #1 that describes HPHT environment is confusing as currently worded. What does the #1 condition cover that environment condition #2 does not already cover? Suggest that condition #1 be eliminated or clarified.

Having the rule based on 'HPHT environment' being defined as the pressures and temperatures at the wellhead, whether a surface wellhead or subsea wellhead, is not necessarily appropriate for the 'related' equipment, including the SCSSV. It would be more appropriate to define HPHT environment by the anticipated worst case service conditions at each piece of related equipment. When the significant physical distance between the related equipment and the wellhead is combined with the anticipated fluid gradients and temperature gradients, it can result in conditions that push related equipment into >15k or >350 °F conditions in wells that may not be considered a HPHT environment by the current wording. Wells/environments that would not fall into the categorization of HPHT as the rule is currently drafted, could actually need related equipment that is greater than 15,000 psi or 350 °F rated working pressure. As written the rule could be interpreted such that in these applications it would not be necessary for operators to supply supporting design verification for this related greater than 15,000 psi or 350 °F rated working pressure equipment, unless the pressures or temperature at the wellhead deemed the environment as HPHT. If it is intended that operators planning to use related equipment >15k or 350 °F working pressure provide design verification then this should be clearly conveyed.