

7/17/98



Department of Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Virginia 20170-4B17

Attention: Rules Processing Team (Comments)

Newfield Exploration Company would like to submit the following comment to the proposed changes to 30 CFR Part 250.6

MMS proposed wording is as follows:

250.6 (g)(5)

You may not weld while you drill, complete, workover, or conduct wireline operations unless the fluids in the well are noncombustible and you have precluded the entry of formation hydrocarbons into the wellbore.....

Proposed Change:

You may not weld while you drill, complete, workover, or conduct wireline operations unless the fluids in the well, **(being drilled, completed, worked over, or having wireline operations conducted)**, are noncombustible and you have precluded the entry of formation hydrocarbons into the wellbore **either by mechanical means or by a positive overbalance toward the formation.**

The intent is to limit welding activities on or near wells that are being serviced or drilled, not limit welding because other wells in the well bay are live. Other provisions cover that situation. The proposed wording by the MMS does not limit which well must have noncombustible fluids in it, i.e. only the well being serviced or all wells.

The MMS proposal also dropped the provision of a positive overbalance toward the formation. However to clarify that this is still acceptable, but not to only limit overbalance situations as the only method of precluding entry of hydrocarbons into the wellbore, we would like to add "mechanical means or overbalance toward the formation" as acceptable means of limiting entry of formation hydrocarbons.

If you have any questions, please contact Gary Harrington at 281-847-6000. Three copies of this letter will be mailed to your address, along with the faxed copy sent today.

Regards

Gary Harrington

07/17/98

MMS_welding_response.doc

Newfield Exploration Company 363 N. Sam Houston Pkwy. E. Suite 2020 Houston, Texas 77060 (281) 847-6000 Fax (281) 847-6006

TOTAL F