

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

NTL No. 2009-G33

Effective Date: November 4, 2009
Expiration Date: November 3, 2014

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

Well Naming and Numbering Standards

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2000-N07 on this subject. It clarifies the definitions of a sidetrack and bypass, provides additional guidance for naming subsea well completions, makes minor administrative and formatting changes, and includes a guidance document statement. Although NTL No. 2000-N07 and its predecessor (NTL No. 97-2N) were national in scope, this revision applies only to well naming and numbering in the Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR).

The MMS regulation at 30 CFR 250.150(a)(1) outlines the requirements for naming wells in the GOMR. The Attachment to this NTL, including its exhibits, outlines the updated policy for well naming and numbering in the MMS GOMR.

Guidance Document Statement

The MMS issues NTL's as guidance documents in accordance with 30 CFR 250.103 to clarify, supplement, and provide more detail about certain MMS regulatory requirements and to outline the information you provide in your various submittals. Under that authority, this NTL sets forth a policy on and an interpretation of a regulatory requirement that provides a clear and consistent approach to complying with that requirement. However, if you wish to use an alternate approach for compliance, you may do so, after you receive approval from the appropriate MMS office under 30 CFR 250.141.

Paperwork Reduction Act Statement

The information collection provisions of this NTL are intended to provide clarification, description, or interpretation of requirements contained in 30 CFR 250, Subparts A and D. The Office of Management and Budget (OMB) has approved the information collection requirements for these regulations and assigned OMB Control Numbers 1010-0114 and 1010-0141, respectively. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contacts

Please direct any questions concerning this NTL to either to the Drilling Engineer or the Workover/Completion Engineer from the appropriate MMS GOMR District office or the MMS GOMR Data Administration Unit at (504) 736-2801.

[original signed]

Lars T. Herbst
Regional Director

Attachment with Exhibits

Attachment

WELL NAMING AND NUMBERING STANDARDS IN THE MMS GOMR

General

The MMS GOMR uses four distinct names and numbers to uniquely identify each well, wellbore, and well completion. They are:

- American Petroleum Institute (API) well number.
- Producing interval code.
- Outer Continental Shelf (OCS) lease number, well or well completion name.
- Well name suffix.

The MMS GOMR primarily uses the API well number and producing interval code to manage digital data. The OCS lease number, well or well completion name, and well name suffix are still prevalent in reports, surveys, correspondence, and verbal communications. This document includes definitions, instructions, and exhibits showing how the MMS GOMR determines well names and numbers. The examples include many of the unusual or new types of wells, well completions, and producing situations where applying the standards is more complicated. The MMS GOMR District Offices assign and/or establish this nomenclature when well permits and reports are approved and/or processed. Additional examples can be found in the MMS Field Operations Reporter's Handbook which provides specific guidance on how to prepare and submit well permits and reports to the MMS GOMR District Offices. The handbook is available on the MMS Web site at <http://www.gomr.mms.gov/homepg/mmsforms/reportershandbook.pdf>.

This updated standard makes minor changes to, and supersedes, previous MMS standards. However, you should not file corrected permits or reports solely to comply with these changes. When the MMS GOMR discovers or you inform us of an unnumbered drilled hole, we will assign an MMS API number according to this standard if we have the basic data describing the well, such as offshore area, block, lease number, relevant dates, and key measured depths.

Definitions

Bypass means a remedial drilling effort in which you re-drill portions of a hole around junk (i.e., lost tools, pipe, or other material blocking the hole), re-drill "lost holes," are re-drilled, or make directional corrections (straighten "key seats" or "crooked holes). In general, the proposed bottom-hole location of the new borehole is within 500 feet of the proposed bottom-hole location of the previous borehole. This is also called a mechanical sidetrack (*see Exhibit 3*).

Capacity well means a well completion with two or more tubing strings producing or capable of producing from the same reservoir (*see Exhibit 10*).

Horizontal well means a well with a borehole whose angle of deviation is 75 degrees or greater for more than four consecutive directional survey points (*see Exhibit 13*).

Multilateral well - a well with two or more wellbores, usually but not necessarily drilled and completed horizontally or highly directionally, that share a common surface casing (*see Exhibit 14*).

Sidetrack means a drilling effort in which an additional hole is drilled by leaving a previously drilled hole at some depth below the surface and above the total depth. A whipstock or cement plug is set in the previously drilled hole, which is the starting point for the sidetracking operations. The drilling of a well after a slot reclamation (which previously had a well) is considered a sidetrack. This section of the hole is directionally drilled to a new objective bottom-hole location (target), which is generally more than 500 feet from the previously proposed bottom-hole location. This is also called a geologic sidetrack (*see Exhibit 1*).

Splitter wells means two or more wells drilled, cased, and completed, sharing a common borehole at the surface, but allowing independent production and individual access to each well (*see Exhibit 15*).

Well means one or more wellbores drilled into the Earth for the purpose of either finding or producing underground resources or providing services related to the production of underground resources.

Wellbore/borehole means a unique, oriented hole from the bottom of a drilled interval to the surface. If more than one path exists from a surface location to bottom-hole point(s), then more than one wellbore exists.

Well completion means a distinct physical arrangement within a wellbore that provides an isolated conduit for the production or injection from/to one or more sets of perforations or open-hole intervals.

API Well Number

For OCS wells, MMS assigns API well numbers according to the API Well Number and Standard State and County Numeric Codes Including Offshore Waters (API Bulletin D12A), published in January 1979, and the instructions and examples in this document. Where these two differ, the guidance in this NTL overrides the API standard. The differences result from when MMS issued NTL No. 97-2N and began assigning API well numbers to new bypasses and to historical bypasses to better manage the data collected from drilling operations. API Bulletin D12A recommended reserved sidetrack codes for remedial sidetracks only be assigned for proprietary use by companies and data systems. The API Bulletin D12A committee did not anticipate that MMS would want to manage the data as well.

The MMS GOMR assigns the API well number to the original wellbore(s) when we approve Form MMS-123, Application for Permit to Drill (APD). We also assign API well numbers for

subsequent sidetracks and bypasses with the APD. We sequentially increment the wellbore (WB) codes, consisting of the 11th and 12th digits of the API well number, for each subsequent wellbore (sidetrack or bypass) drilled. This includes all sidetracks and all bypasses for which you collect any geologic data (well logs, velocity surveys, core analyses, etc.), or run any directional surveys.

- If a bypass is less than 100 feet in length and has no associated geological data or directional survey, we will not assign an API well number.
- Unless a well deepening is to a new target location, the MMS GOMR will not assign a new API well number. In these cases, we will increment the API number WB code and use a sidetrack (ST) identifier for the well name suffix (see section below regarding well name suffixes).

The standard format 12-digit API well number is structured as follows:

<u>State Code</u>	<u>County Code</u>	<u>Sequence Code</u>	<u>WB Code</u>
99	999	99999	99

- **State codes** are two digits. Use the standard API state or pseudo state codes.
- **County codes** are three digits. Use the standard API county or pseudo-county codes
- **Unique well codes** are five digits. For OCS wells, MMS or the appropriate coastal state sequentially assigns a unique number from 1 to 60,000 for every well permitted for each county or pseudo-county.
- **WB codes** are two digits. The MMS identifies the original hole by using a WB code of “00.” For each and every sidetrack, bypass, or other wellbore drilled after the original hole (except well deepenings to the original intended target), MMS sequentially increments and assigns the WB code. The MMS changed the name of this code from the API Standard “ST” to “WB” to reflect the broader use of the code in this standard so as to identify all wellbores rather than just geological sidetracks.

For various reasons in the past, the MMS GOMR did not assign MMS API well numbers to some sidetracks and bypasses, and we accepted well name suffixes on various documents without any validation. For historical wells without MMS API numbers or validated well name suffixes, MMS will validate existing operator nomenclature or assign new names and numbers using WB codes in the range 70-89 when we obtain supporting data (*see Exhibit 3*). ***The MMS will not change existing API numbers already assigned, including WB codes, to comply with this standard.***

If MMS has not assigned an API well number for an OCS well, or if you or MMS cannot find the API number, then MMS will assign a temporary sequence number between 85,000 and 90,000 for you to use until MMS locates the permanent number or the appropriate District Office assigns a permanent number.

Producing Interval Code

The MMS establishes the *producing interval code*, sometimes referred to as the completion code, for each well completion when we process and accept Form MMS-125, End of Operations Report.

- The 3-character producing interval code (**ANN** where **A** = an alpha character and **NN** = numeric characters) is a separate identifier and is not part of the 12-digit API well number. However, it does complete the well number for reporting purposes.
- Select the first character (alpha) of the code based upon the number of tubing strings in the wellbore that are capable of production. For example, a producing interval code of “S01” indicates a single tubing string; “D01” indicates a dual completion (*see Exhibits 4 through 6*).

Note: In the case of a tubingless or other completion where production from one reservoir flows through a tubing string and production from another reservoir through the annulus, the first alpha character of the producing interval codes will be “D.” In this case, this does not signify the presence of two tubing strings, but indicates there are two separate production streams with the annulus acting as a tubing string (*see Exhibit 7*).

- The numeric portion is uniquely and permanently related to a specific completion zone or producing configuration within a wellbore. Select the numbers sequentially beginning with the number “01” for the first reservoir completed within a wellbore, followed by consecutively increasing numbers assigned to successively completed reservoirs. For example, a producing interval code of “S01” indicates the first reservoir completed in the well; “S02” indicates the second reservoir completed. If, however, additional perforations are added to an “S01” completion in the same reservoir, the producing interval code remains “S01” since the completion is still producing from the same reservoir or commingled situation.

The components of the producing interval code are:

<u>1st Character</u> (Indicates No. of Tubing Strings)	<u>2nd and 3rd Characters</u> (Indicates Reservoir Completed) 01 through 99
Borehole -X	
Single -S	
Dual -D	
Triple -T	
Quadruple -Q	
Quintuple -V	

Use a producing interval code of “X01” when reporting only the wellbore, as in the following cases:

- Reporting an active or inactive drilling well.
- Reporting a wellbore in which all completions have been abandoned, but the wellbore itself has not been abandoned (e.g., temporary abandonment).
- Reporting a wellbore that has been permanently plugged.

Largely because of new technology, special completions and producing situations exist that require exceptional naming and numbering guidelines. In part, we address these cases by reserving and using blocks of producing interval codes for well completion identification purposes. These reserved producing interval code ranges are identified as:

<u>Producing Interval Code</u>	<u>Reserved For</u>
01-19	All “ <i>routine</i> ” producing completions not included in any of the following groups.
21-39	All completions that involve the combined production of unit and non-unit hydrocarbons in a single tubing string (<i>see Exhibit 8</i>).
41-59	All completions that cross lease/unit lines (<i>see Exhibit 9</i>).
61-79	All “ <i>capacity</i> ” completions (<i>see Exhibit 10</i>).
81-99	Unassigned.

OCS Lease Number/Well and Completion Name

The OCS lease number is the MMS-assigned identification for the lease at the targeted total depth of the well. The OCS lease number will change for wells subsequently sidetracked into another lease.

- You select and the MMS approves the well name (**AANN** where **A** = an alpha character and **N** = a numeric character) on Form MMS-123, Application For Permit To Drill (APD). You designate wells drilled from an existing platform with a platform prefix in the well name (e.g., A001, A002). The prefix also indicates whether a well is associated with a satellite subsea completion (e.g., SS001, SS002). Otherwise, you designate wells by a number only in the well name (001, 002). If the well is tied back to a subsequently installed platform, we change the name to include the platform (from 001 to A001). If more than one platform is to be installed in a field, it is named with the next available alpha character (e.g., B001). You may change the well name with subsequent operations when we approve a Form MMS-124, Application for Permit to Modify (APM). It should be noted that although the SS convention for naming satellite subsea completions provides a benefit to the MMS, operators frequently propose to name their multi-well development subsea completions by prospect or project name, drill center name, or some other type convention. MMS has been flexible in allowing alternative naming conventions as long as they are logical and satisfy the minimum field requirements to be captured in the MMS corporate data system. You should avoid starting the name of a subsea completion with a single alpha character.
- The MMS establishes the well completion name (**AANNNA**) when we accept and process the Form MMS-125, End of Operations Report, with similar identifying nomenclature (e.g., A001, JA002D, etc.) after the wellbore is completed. For multiple completions, you add a single alpha character to the end of the well name to distinguish the specific tubing string and productive interval (e.g., Well A001D). It should be noted that the MMS web-based well permitting system (eWell) does not allow you to add the alpha character completion identifier. In eWell, where there are multiple completions, each zone is distinguished through the Producing Interval Code only.

Well Name Suffix

The well name suffix is an extension to the well name; i.e., it identifies each wellbore and indicates the number of times a well has been sidetracked and the number of times each target has been bypassed. You provide and MMS approves the well name suffix on Form MMS-123, Application for Permit to Drill (APD) for each subsequent wellbore drilled.

- The well name suffix is an identifier (**AANNAANN**) with a maximum of 8 characters indicating whether the wellbore is a sidetrack or a bypass and the number of sidetracks and bypasses that have occurred.
- You will select and MMS will approve the alpha identifier(s) **AA** in the well name suffix to indicate whether the wellbore is a sidetrack or a bypass from the original hole or an earlier

sidetrack. You will select and MMS will approve the numerical identifier(s) **NN** in the well name suffix sequentially such that the number(s) will indicate the number of sidetracks associated with a well and the number of bypasses associated with the original hole or sidetrack. For example, if the original hole is bypassed, the assigned well name suffix is ST00BP01. If two sidetracks were drilled sequentially after the original hole, the assigned well name suffixes would be ST01BP00 and ST02BP00. If the second sidetrack was also bypassed, the assigned well name suffix would be ST02BP01.

- Identify sidetracks and well deepenings to a new target with an **ST** well name suffix. For well deepenings to the original intended target, such as in the case of batch set operations, the well name suffix remains unchanged and the API well number WB code is *not* incremented.
- You should propose revised well name suffixes previously assigned according to NTL No. 97-2N (e.g., WB01, WB02), with subsequent filings for other purposes on Form MMS-124, Application for Permit to Modify (APM). In the MMS GOMR, we will assign well name suffixes according to this standard to all existing wells with MMS assigned API numbers when the data are verified under the Historical Well Data Cleanup Project (refer to NTL No. 2006-G18).

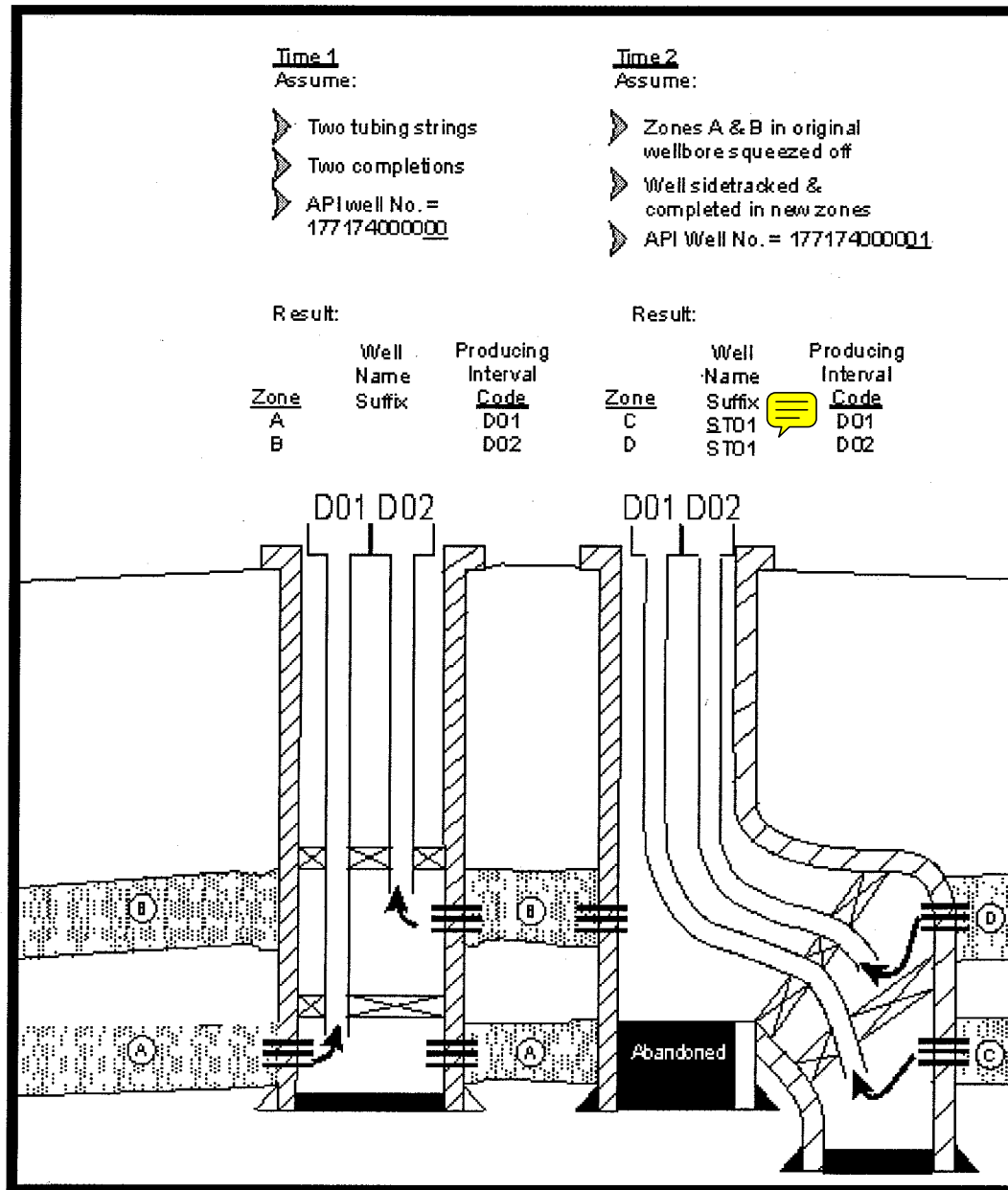
Well Numbering Examples

Examples of the correct well numbering standards are demonstrated on the attached exhibits.

<u>Exhibit</u>	<u>Example</u>
1	Sidetrack Well
2	Well Deepened
3	Historical Wellbore With No API Number Assigned
4	Recompleting a Well
5	Workover
6	Collapsed Tubing String
7	Tubingless Completion
8	Unit and Non-Unit Production Combined
9	Completion that Crosses Lease/Unit Line
10	Capacity Well
11	Downhole Commingling – Single Tubing String
12	Downhole Commingling – Dual Completion
13	Horizontal Well
14	Multilateral Well
15	Downhole Splitter Well

Exhibit 1

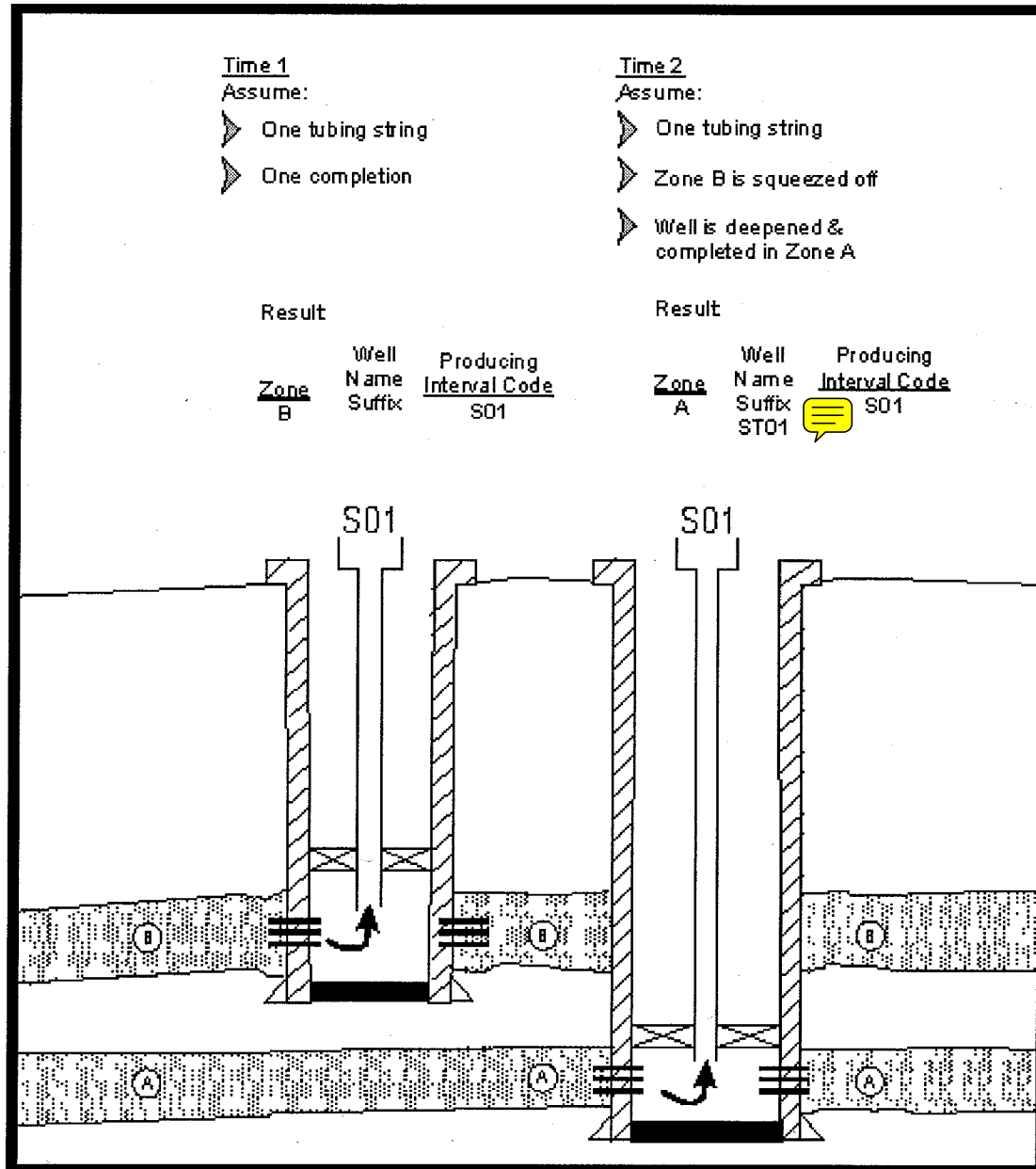
Sidetrack Well



Note: Since a sidetrack creates a unique API Well No. all completions are assigned new producing interval codes independent of original wellbore.

Exhibit 2

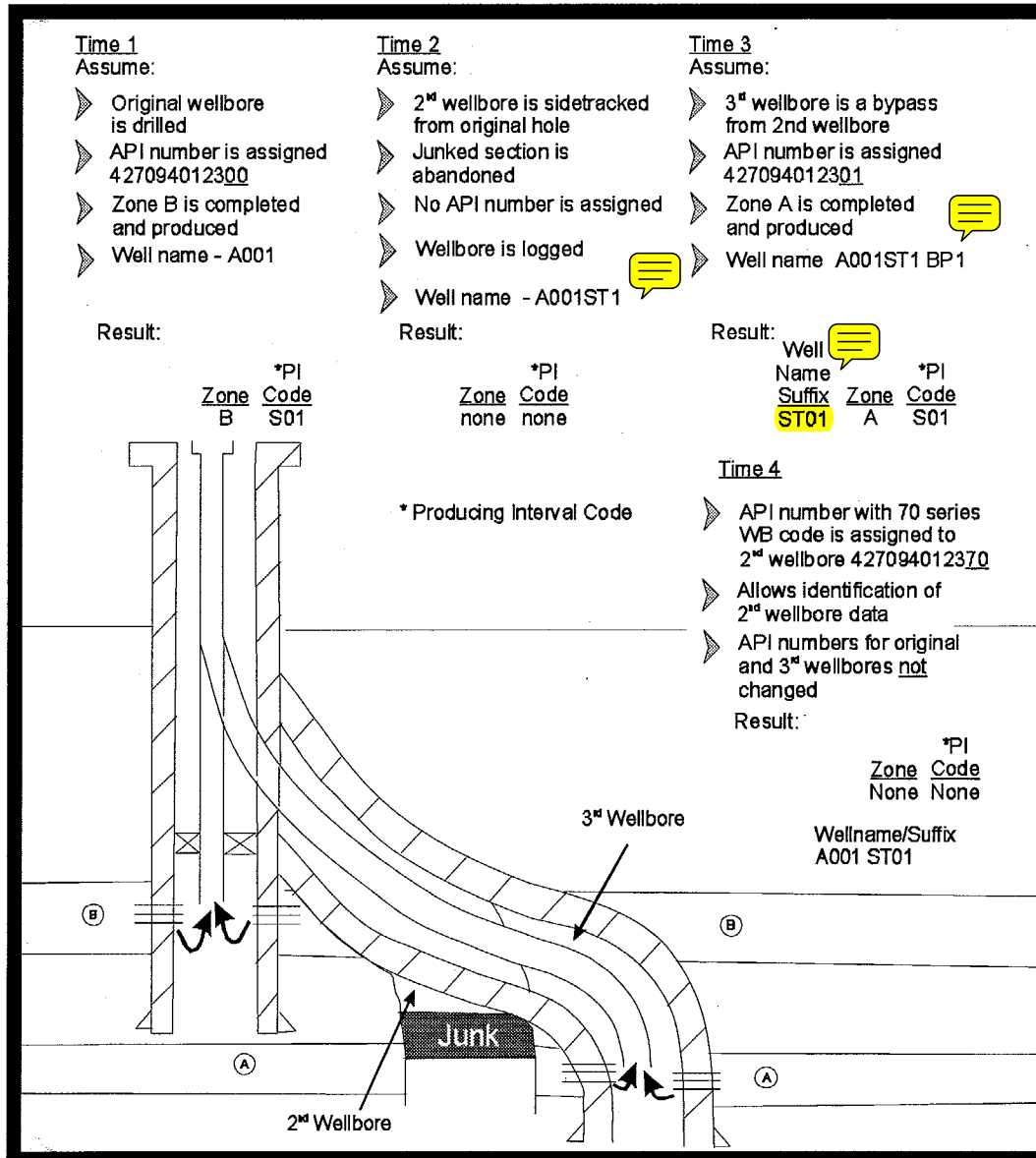
Well Deepened



Note: In this example, the well is initially completed and later deepened and recompleted in another zone. The API number WB code is incremented to 01. The producing interval code remains S01.

Exhibit 3

Historical Wellbore With No API Number Assigned



Note: Historical sidetracks, bypasses, well deepenings, etc., that were not initially assigned an API number can be assigned an API number with a 70 series WB code at a later time, so that any wellbore data can be identified. API numbers already assigned will not be changed.

Exhibit 4

Recompleting A Well

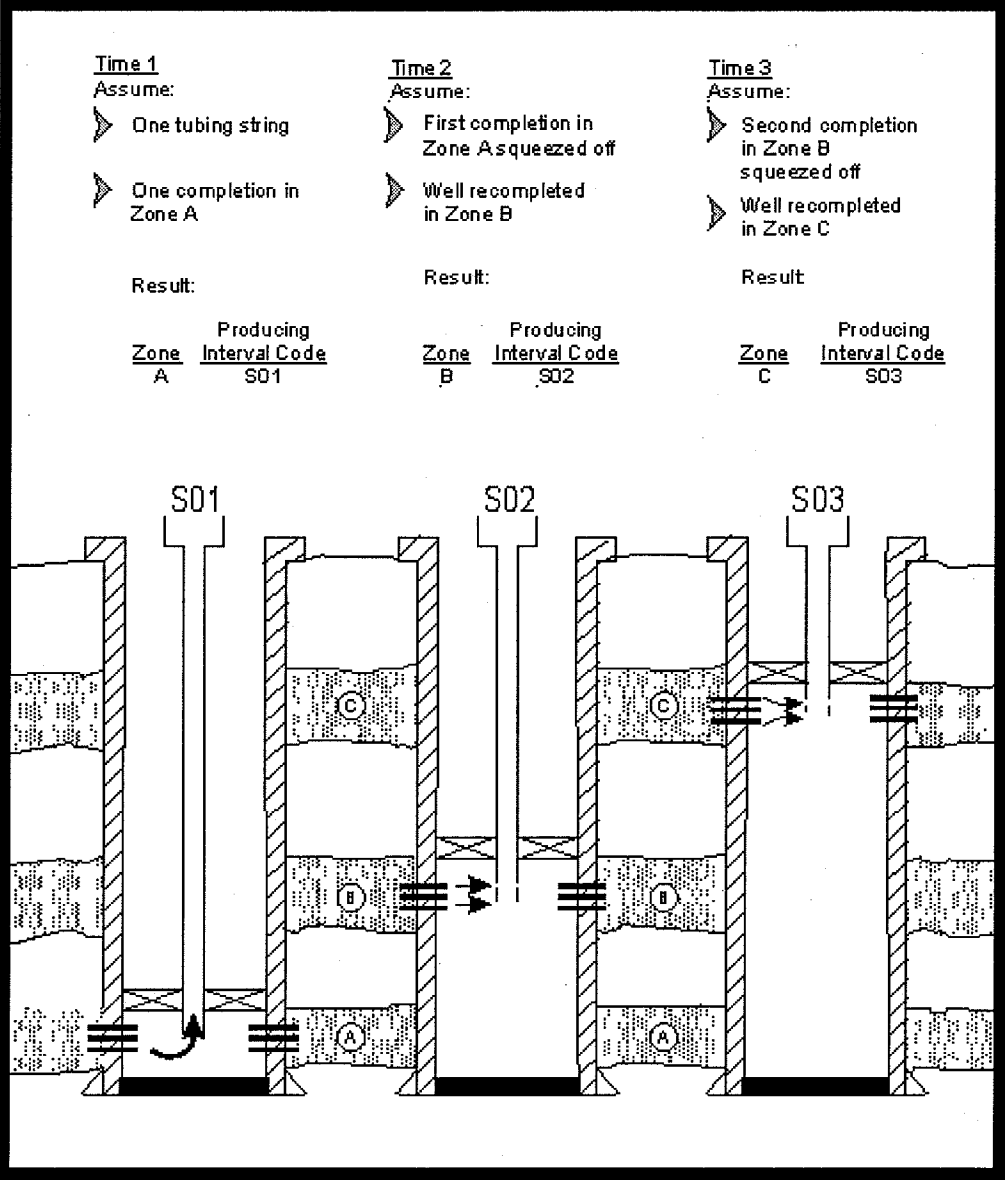
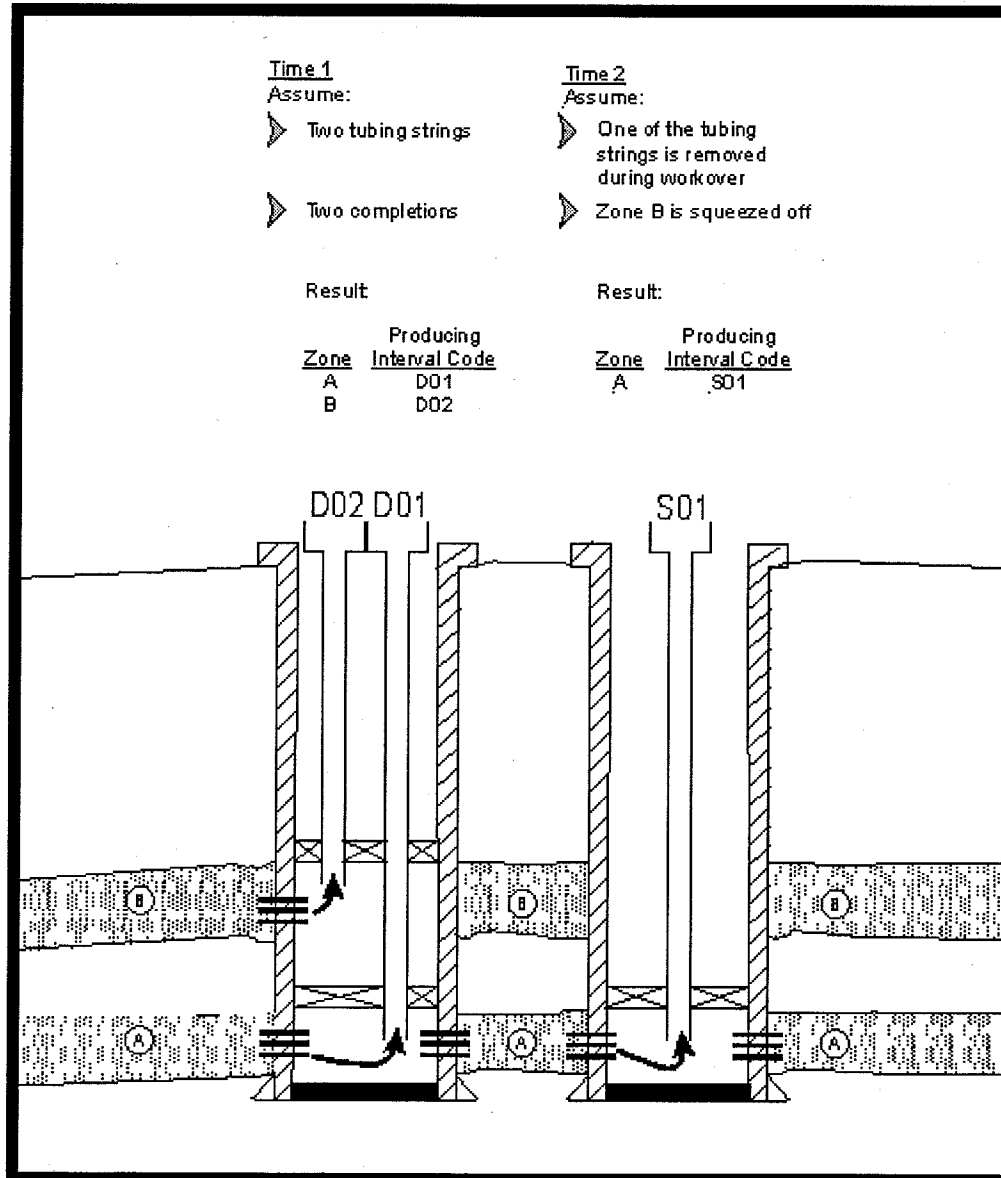


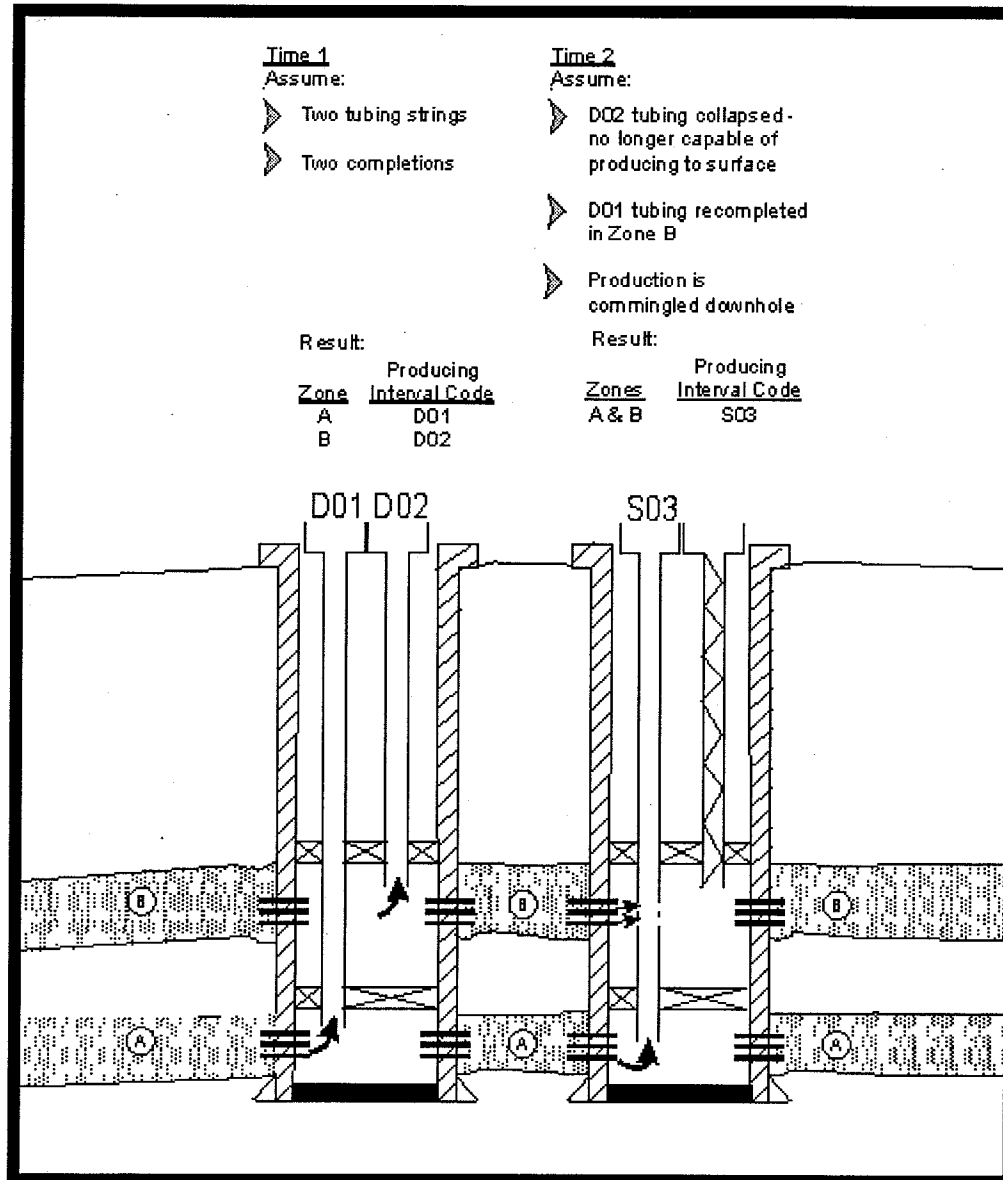
Exhibit 5 Workover



Note: The D02 completion must be reported as abandoned (status code = 15) on the OGOR-A in the same month that the S01 completion begins reporting.

Exhibit 6

Collapsed Tubing String



Note: The D01 & D02 must be reported as completion abandoned (status code = 15) on the OGOR - A in the same month that the S03 begins reporting.

Exhibit 7

Tubingless Completion

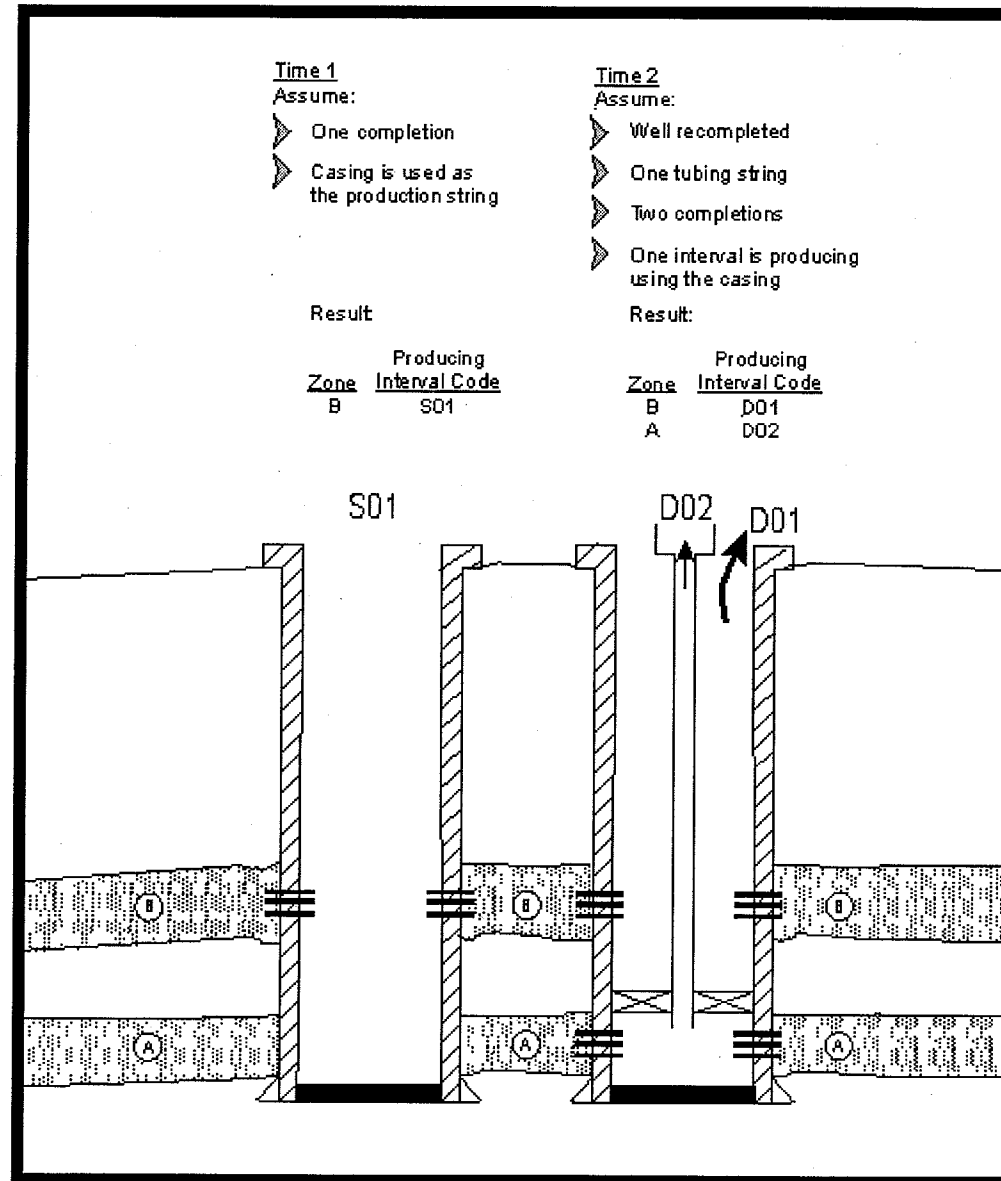
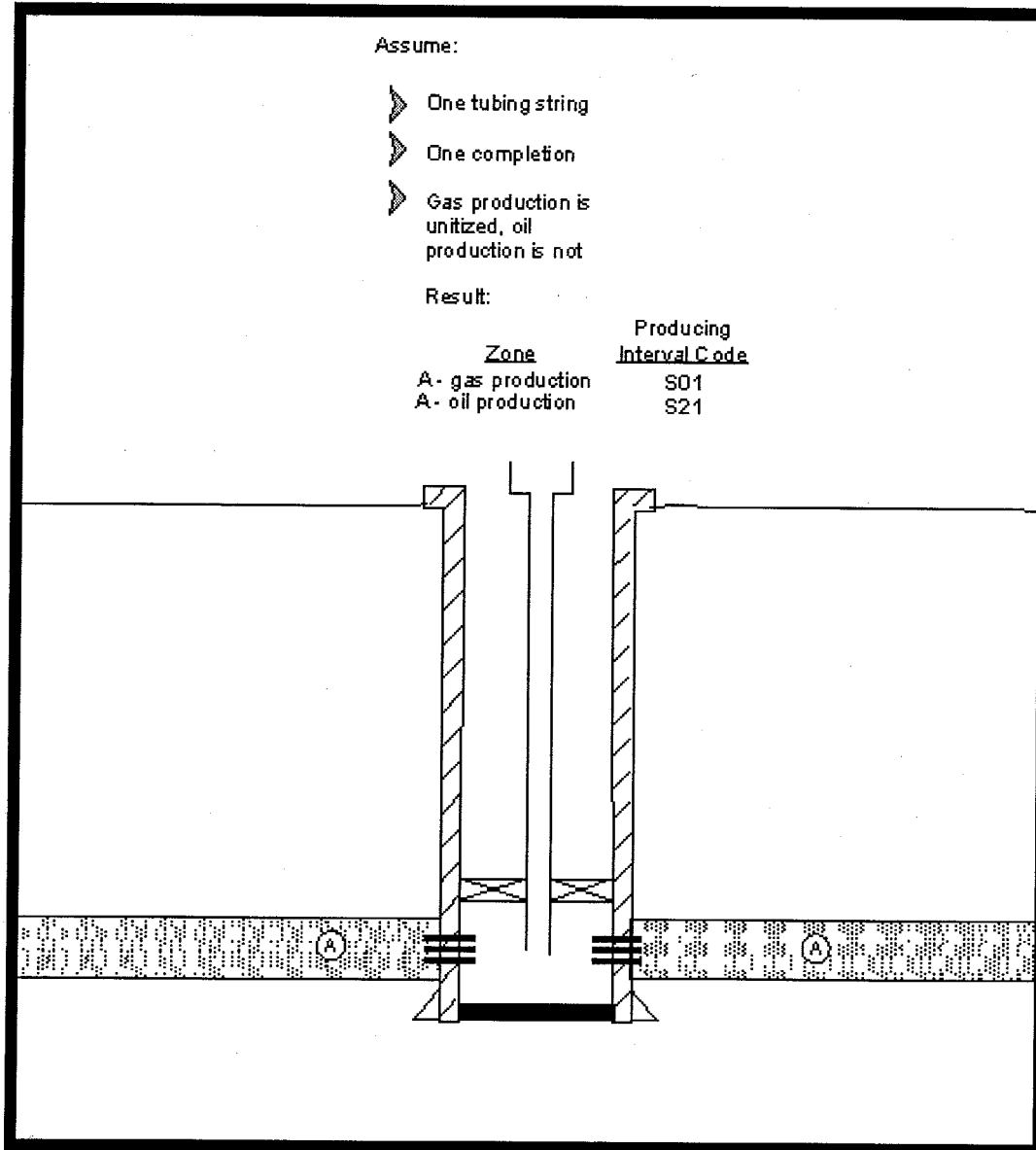


Exhibit 8

Unit and Non-Unit Production Combined



Note: Gas production would be reported on unit OGOR - A; oil production would be reported separately on lease OGOR - A

Exhibit 9

Completion That Crosses Lease Line

Assume:

- ▶ Directional or horizontal well is completed with the perforated interval crossing a lease line.

Result:

Two completion records set up, one for each lease.

API number, including WB code, and well name suffix will be the same for both records.

Producing interval codes will be S41 and S51.

Production and test data will be allocated to each lease based on method specified by MMS.

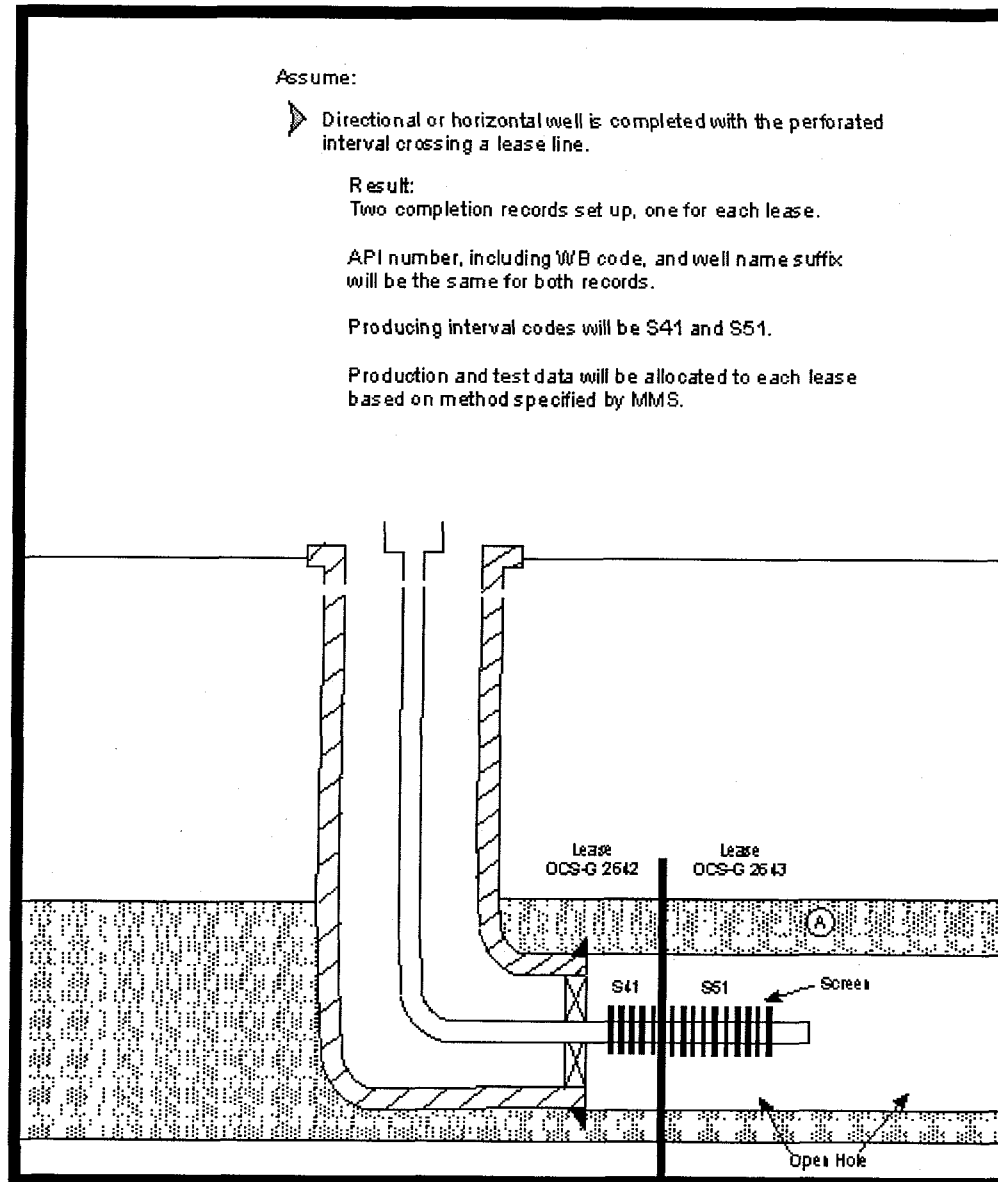
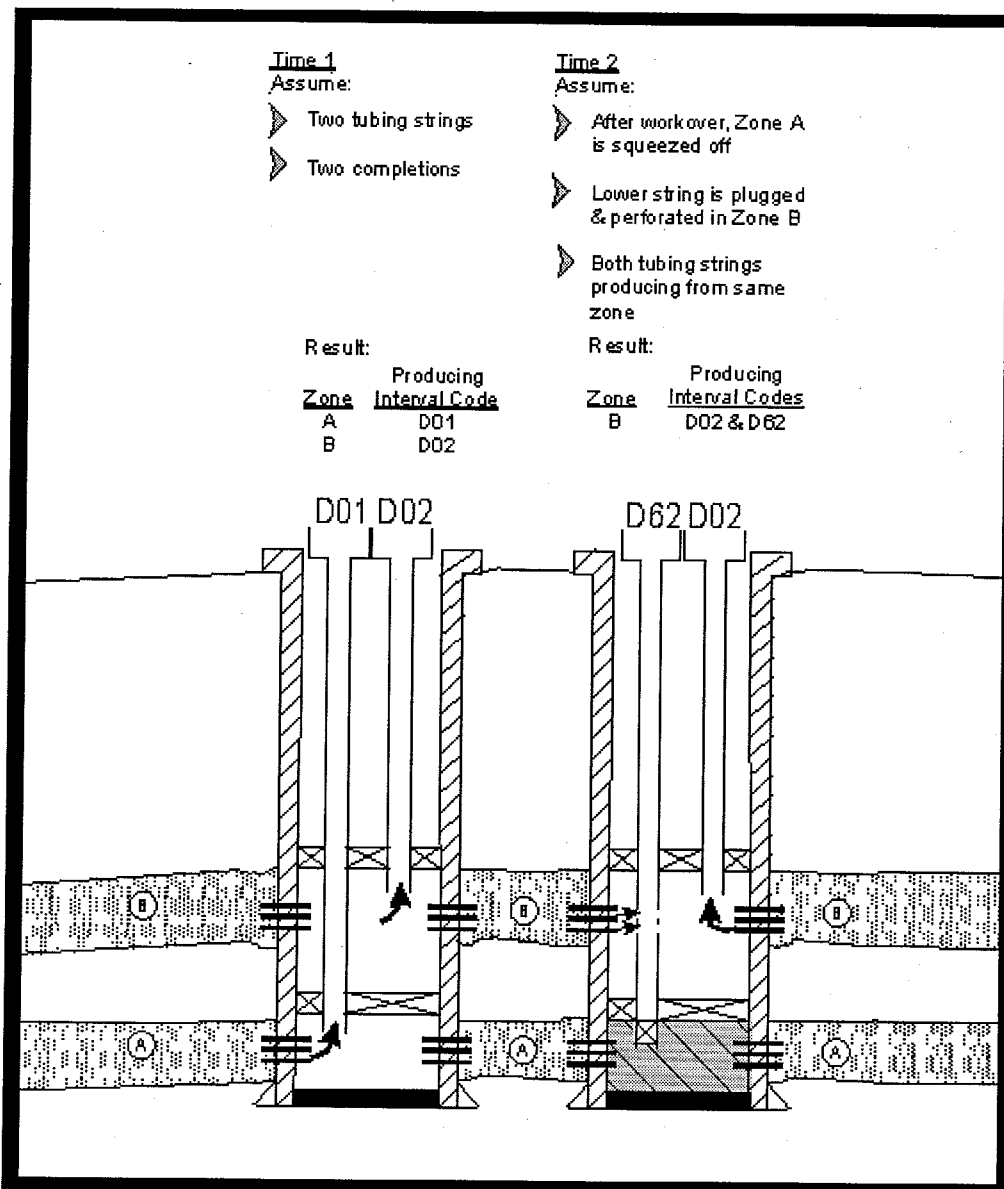


Exhibit 10

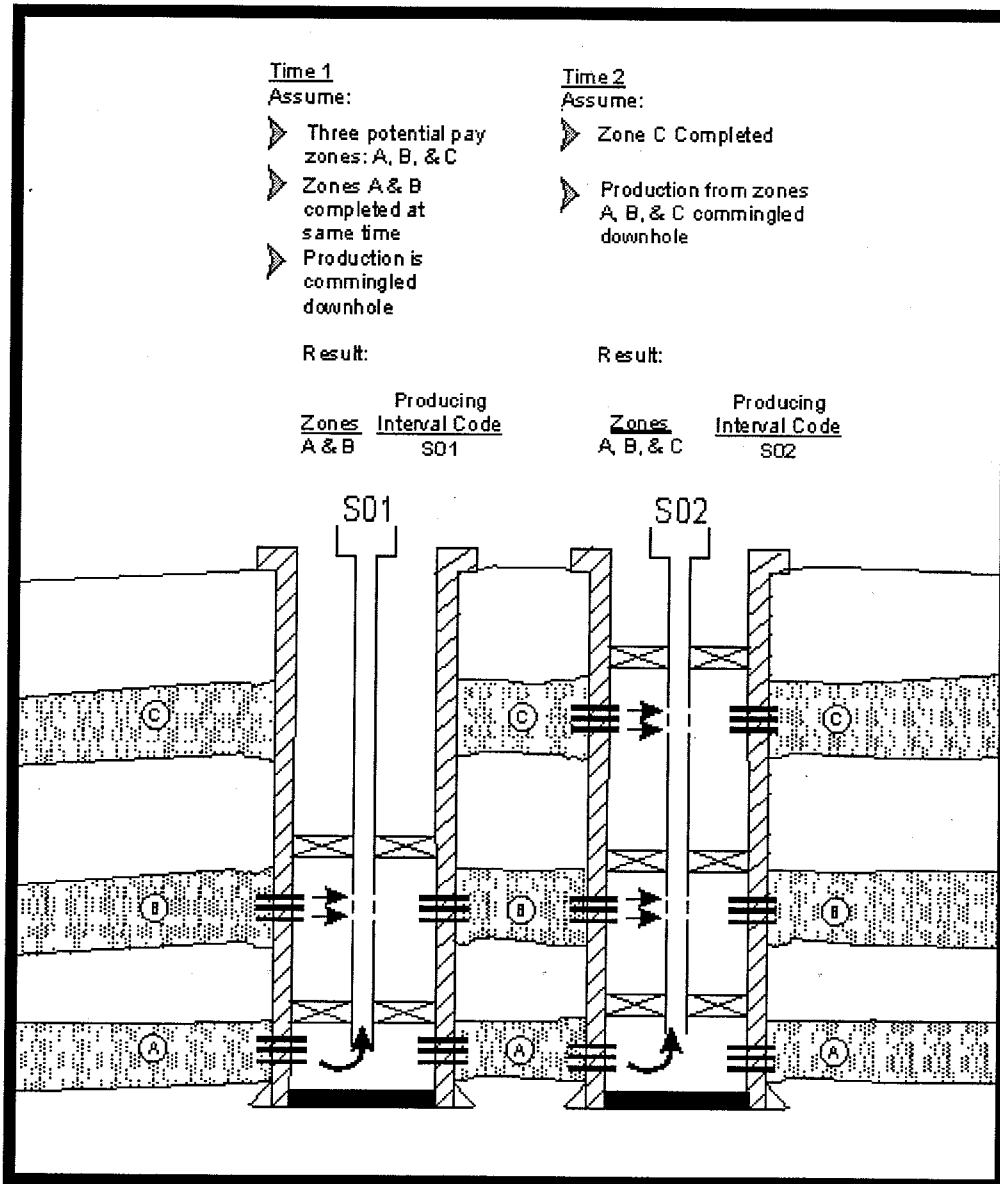
Capacity Well



Note: The D01 completion must be reported as a completion abandoned (status code 15) on the OGOR-A in the same month that the D02 and D62 completions begin reporting.

Exhibit 11

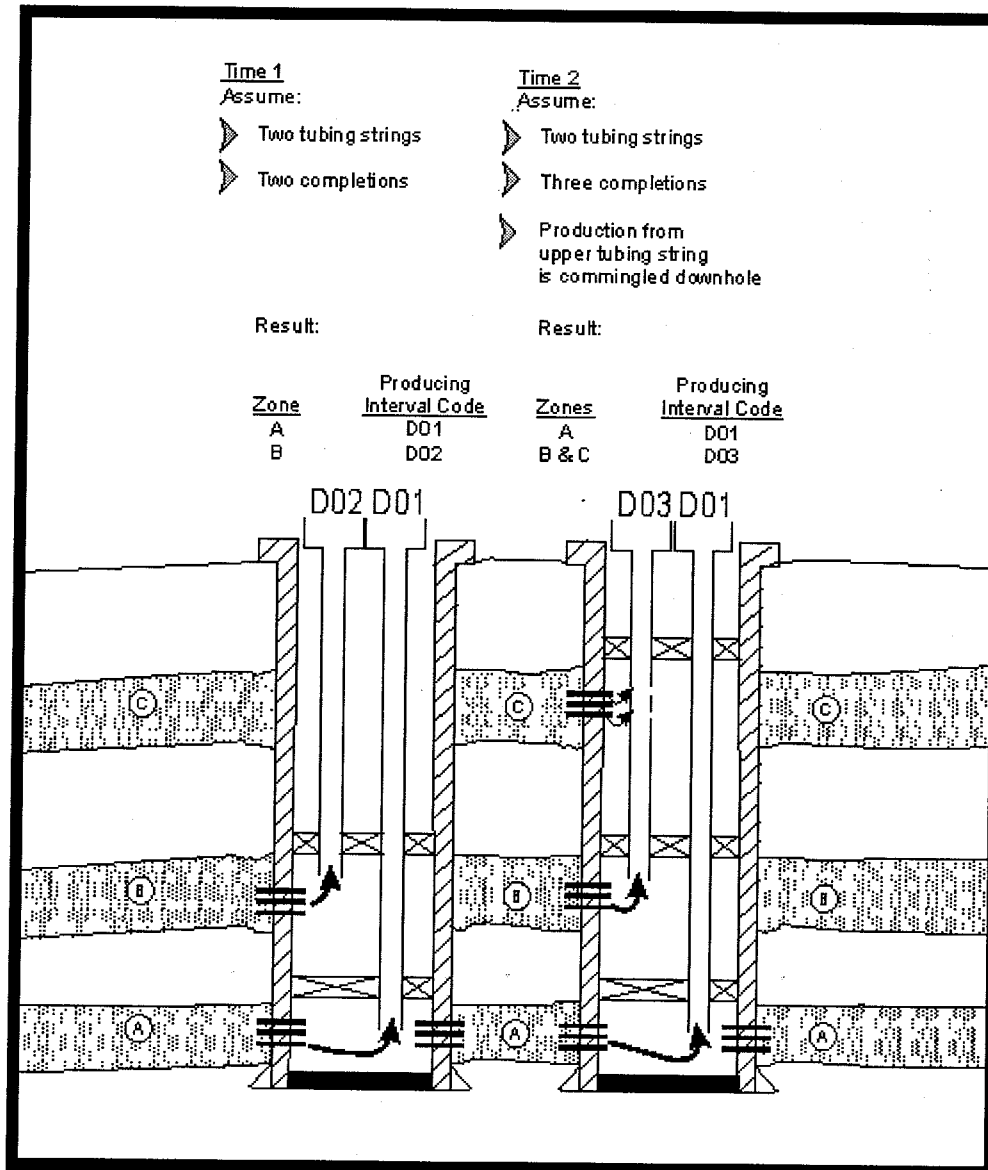
Downhole Commingling Single Tubing String



Note: The S01 must be reported as a completion abandoned (status code = 15) on the OGOR - A in the same month that the S02 begins reporting.

Exhibit 12

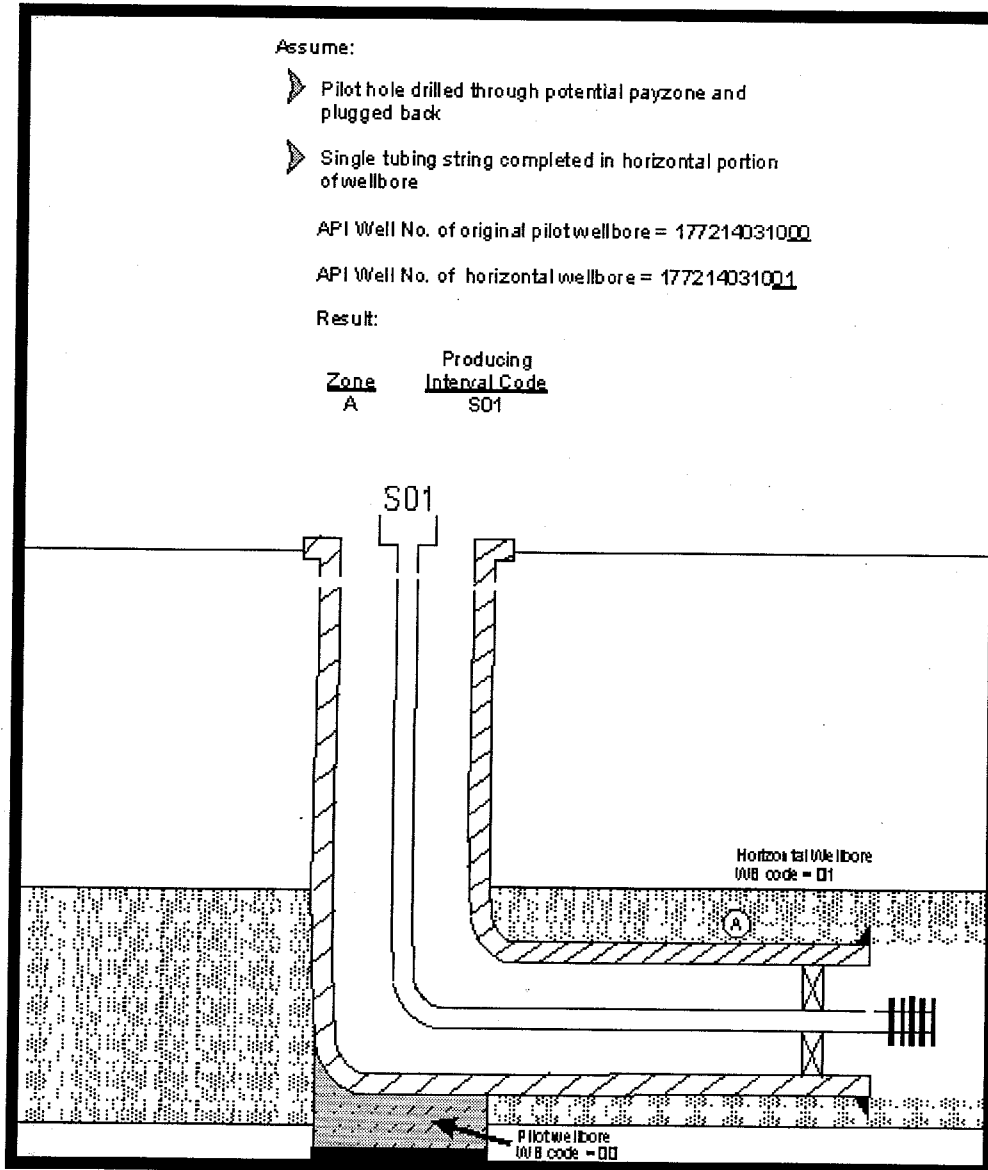
Downhole Commingling Dual Completion



Note: The D02 must be reported as a completion abandoned (status code = 15) on the OGOR - A in the same month that the D03 begins reporting.

Exhibit 13

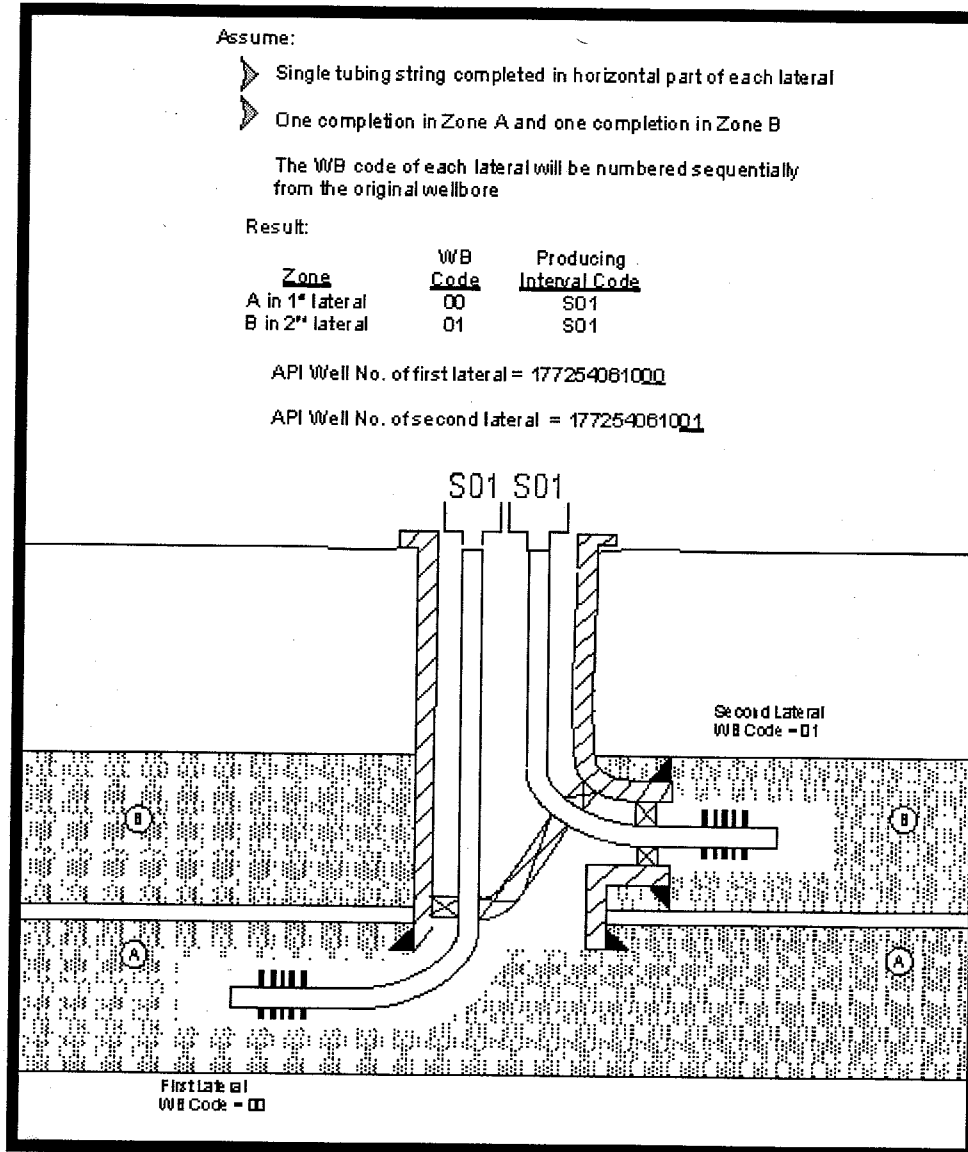
Horizontal Well



Note: Pilot wellbore is reported as plugged and abandoned (status code = 16) on the OGOR-A.

Exhibit 14

Multilateral Well



Note: Both laterals are open to production. The producing interval codes of S01 are unique to each wellbore segment.

Exhibit 15

Downhole Splitter Well

Assume:

- Single tubing string in each wellbore completed in horizontal position of well
- Since each wellbore has separate production casing & trees at surface, API Well No. of each wellbore will be numbered separately.
- WB code remains 00 for each wellbore.
- Each splitter well has a different well name (eg., A-1 and A-2).

Result:

API Well number of first wellbore drilled = 177244021000
First wellbore, Zone A - S01

API Well number of second wellbore drilled = 177244021100
(or next available API well number)
Second wellbore, Zone A - S01

