

U.S. Department of the Interior Minerals Management Service Gulf of Mexico OCS Region

Notice No. 152

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Circulating with Natural Gas Through Coil Tubing

Some lessees have requested coil tubing operators to circulate with natural gas to bring in anoil well. There are numerous hazards associated with this procedure.

30 CFR, Section 250.46, Safe and Workmanlike Operations, requires the lessee to perform all operations in a safe and workmanlike manner and take all necessary precautions to control, remove, or otherwise correct any hazardous oil and gas accumulation or other safety, health, or fire hazard.

Minerals Management Service has determined that using natural gas as the lift medium in coil tubing operations does not conform to Section 250.46. This practice should not be used because the potential exists for release of high pressure natural gas into the work environment as a result of tubing or equipment failure.

[signed] D. J. Bourgeois

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Field Operations

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