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

## NTL No. 98-26 November 30, 1998

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

## Minimum Interim Requirements for Site Clearance (and Verification) of Abandoned Oil and Gas Structures in the Gulf of Mexico

This Notice to Lessees and Operators (NTL) supersedes NTL No. 92-02. It is issued to update the cited regulatory authorities and to include a statement regarding the Paperwork Reduction Act of 1995.

This NTL is provided under the authority of 30 CFR 250.104(b). According to 30 CFR 250.105(a), 250.702(i), 250.704, 250.913 (a), (b), and (c), and Section 22 of the Lease Agreement pertaining to removal of property on termination of the lease, the Minerals Management Service (MMS) has established a program designed to ensure that any object (i.e., wellheads, platforms, etc.) installed on an Outer Continental Shelf (OCS) lease is properly removed and the site cleared so as not to conflict with other uses of the OCS.

- Sections 250.702(i) and 250.913(b) of the regulations require lessees (or operators) to clear all abandoned well and platform locations of all obstructions present as a result of oil and gas activities. For clearance purposes, the locations are defined as:
  - a. Exploratory or delineation wells drilled with a Mobile Offshore Drilling Unit (MODU) The area covered by a 300-footradius circle centered on the well.
  - b. Platforms The area covered by a 1,320-foot-radius circle centered on the platform geometric center.
  - c. Single well caissons and well protectors The area covered by a 600-foot-radius circle centered on the well.
- 2. The lessee (you) must develop and submit a procedural plan for site clearance verification of platform or structure abandonments (paragraphs 1b and c above) to the MMS Regional Supervisor, Field Operations, for approval with the permit application for platform or structure removal. For well abandonments (paragraph 1a above), you must submit a similar plan to the District Supervisor for approval with the Sundry Notices and Reports on Well for well abandonment (Form MMS-124). As a minimum, you must verify site clearance by the applicable method listed in paragraph 2a. Vessels used for site clearance verification operations must be equipped with a navigational positioning system capable of providing position accuracy of ±30 feet. The navigational system proposed for use must be identified in the procedural plan.
  - a. Sites defined in paragraphs 1b and c above and located in water depths less than 300 feet must have their locations trawled over 100 percent of their limits in two directions (i.e., N-S and E-W) by a trawling contractor who has no corporate or other financial ties to the company that performed the salvage work. Sites defined in paragraph 1a above need not be trawled, but must have a high frequency (500 KHz) sonar search conducted over the defined area, and the sonar instrument operating frequency scanning range and deployment method (stationary or towed) must be stated in the procedural plan submitted for approval.
    - 1. Trawling contractors performing site clearance verification work must possess a valid commercial trawling license from one of the States of Louisiana, Texas, Mississippi, Alabama, or Florida, for both the vessel and its captain. Further, the captain must have prior experience in trawling operations.
    - 2. The trawling vessel used in verification activities must be equipped with a calibrated navigation system capable of producing a real-time paper track plot of the vessel position or capable of producing a hard-copy post plot on board the vessel of all or any specific lines in order to verify that the area has been satisfactorily covered prior to departure of the trawling vessel. The track of the vessel on the plot must be shown as a continuous line and the track plot must have a minimum scale of 1 inch = 400 feet (1:4800).
    - 3. The trawling vessel must be outfitted with trawling nets that are representative of the accepted shrimping industry standard of up to No. 18 twine (ribbon strength) size net strength. These nets must <u>not</u> be equipped with Turtle Excluder Devices (TED's), since they may serve as escape openings for objects picked up by the trawl. Trawls are to be picked up after a maximum drag time of 30 minutes and all shrimp caught in the trawl are to be released. The Eighth Coast Guard District Law Enforcement Branch should be notified of any site clearance verification trawling operations (where TED's are not used) 48 hours prior to commencing such activities. Further, when trawling is conducted in areas where pipelines, shipwrecks, or hangs (i.e., fisherman's contingency fund hangs) are known to exist, the following guidelines apply:
      - a. There are no restrictions to be placed on the trawling procedure or pattern for abandoned pipelines. It is the responsibility of the lessee (or operator) performing the site clearance verification activities to contact the former pipeline owner (or operator) and determine whether the pipeline will cause an obstruction to unrestricted trawling operations.

- b. In general, trawling should not be conducted closer than 300 feet to any existing shipwreck, but this distance may be reduced depending on the conditions existing at a particular site.
- c. Active pipelines that are buried, and for which no obstructions (such as valves) exist above the mud line, are to be trawled without any restrictions placed on the trawling procedure or pattern. It is the responsibility of the lessee (or operator) performing the site clearance verification activities to contact the pipeline owner (or operator) and determine the condition of the pipelines within the area to be trawled.
- d. For unburied active pipelines that are eight inches in diameter or larger, and for unburied smaller diameter pipelines that have obstructions (e.g., valves) present, trawling must be conducted no closer than 100 feet to either side and in the same direction as (parallel to) the pipeline. Trawling must not be conducted across the pipeline.
- e. For unburied active pipelines that are smaller than eight inches in diameter and have no obstructions present, trawling is to be conducted parallel to the direction of the pipeline and trawling on top of the pipeline is acceptable. Trawling must not be carried out across the pipeline.
- f. We recommend that the operator or trawling contractor contact the MMS "Fisherman's Contingency Fund Hangs Data Base" to see if any recorded hangs are located within the area to be trawled.
- 4. Trawling grid patterns must be as follows for the trawling equipment specified:
  - a. 40-foot grid pattern for vessels trawling with two 50- to 65-foot nets or four 30-foot nets.
  - b. 60-foot grid pattern for vessels trawling with two 66- to 80-foot nets or four 31- to 40-foot nets.
  - c. 80-foot grid pattern for vessels trawling with two 81-foot or larger nets or four 41-foot or larger nets.
- b. The Regional Supervisor, Field Operations must approve any modification of the trawling requirements at a site. You must remove all oil- and gas-related objects encountered by the trawl from the seabed and report as specified below unless we approve otherwise. You must remove any snag on a grid line that is not recovered by the trawl and retrawl the line. For those cases where the trawling effort is interrupted for any reason and then resumed, specification of the necessary overlap of areas trawled (or to be trawled) to ensure 100 percent coverage of the location must be at the discretion of the trawling contractor.
- c. For a well site (paragraph 1a), you must notify the District Supervisor at least 48 hours prior to conducting the clearance survey. For a caisson or platform site (paragraph 1b or c), you must notify the Regional Supervisor, Field Operations, at least 48 hours in advance.
- a. Unless we approve otherwise, within 60 days after you complete a platform or structure removal/abandonment operation, you must complete site clearance verification as specified in the approved plan. Until site clearance verification procedures have been completed, you must mark the location as a hazard to navigation in accordance with U.S. Coast Guard regulations, unless we approve otherwise.
- b. No later than 30 days after you complete site clearance verification activities, you must submit all reports, forms, and letters to the MMS. As appropriate, you must include the following:
  - 1. The date(s) the work was performed and the vessel involved.
  - 2. A statement from the trawling contractor that no objects were recovered, or categorical descriptions and estimated size, quantity, volume, and general location of the objects that were recovered in each category during the trawling activities. The trawler must note the contents of the nets on each trawling pass. However, objects weighing less than 40 pounds and that are of such a shape or configuration that they are unlikely to snag or damage shrimping or fishing devices need not be recorded. Categories of recovered debris to be reported include, but are not limited to, the following:
    - (a) pipe (d) structural shapes (g) long wire rope
    - (b) grating (e) large tires (h) large hoses
    - (c) plate (f) batteries

Additionally, items recovered from diver-assisted snag removals as well as instances of torn nets must be recorded as described above.

- 3. Details and results of the trawling operations, i.e., post-trawling job plot or map showing (minimum scale 1"=200') the pattern in which the trawl was pulled, the size and description of the trawl, grid line numbers corresponding to those used in the trawler's report, center location latitude and longitude, the positioning system and calibration method(s) used, and any interruptions experienced during the survey.
- 4. A letter signed by an authorized lessee/operator company representative stating that he/she witnessed the verification trawling survey (submit with Form MMS-124 or report of platform or structure removal).

**Paperwork Reduction Act of 1995 Statement:** The Paperwork Reduction Act of 1995 (44 U.S.C. 3501 <u>et seq</u>.) requires us to inform you that we collect this information to ensure that any object (i.e., wellheads, platforms, etc.) installed on an OCS lease is properly removed and the site cleared so as not to conflict with other uses of the OCS. Responses are mandatory. No proprietary information unless it displays a currently valid Office of Management and Budget (OMB) control number. We estimate the reporting burden for the collection of information discussed in this NTL to average 6 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the information. Direct comments regarding the burden estimate or any other aspect of this notice to the Information Collection Clearance Officer, Mail Stop 4230, Minerals

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Management Service, Department of the Interior, 1849 C Street, NW., Washington, DC 20240; and to the Office of Information and Regulatory Affairs, Attn: Desk Officer for the Department of the Interior (OMB control number 1010-0058), Office of Management and Budget, Washington, DC 20503.

This NTL also refers to information collection requirements in 30 CFR 250, Subpart G, and on Form MMS-124 (OMB control numbers 1010-0079 and 1010-0045, respectively).

If you have any questions on this NTL, please contact Mr. Arvind Shah at (504) 736-2894.

Chris C. Oynes Regional Director

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