

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

NTL 2001-G06

Effective Date: July 26, 2001

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

**Fire Prevention and Control Systems**

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2001-G05, effective June 20, 2001, on this subject. It makes technical amendments regarding approvals and inoperable firewater systems.

**Background**

The Minerals Management Service (MMS) regulation at 30 CFR 250.803(b)(8)(i) requires that you equip each OCS platform with a firewater system that provides needed protection in all areas where production-handling equipment is located. However, under 30 CFR 250.803(b)(8)(iii), you may use a fire prevention and control system that uses chemicals only in lieu of a firewater system if the appropriate Gulf of Mexico OCS Region (GOMR) District Supervisor determines that the use of a chemical system provides equivalent fire protection and control for personnel egress.

**Approval Requests.**

To obtain approval to use a chemical-only fire prevention and control system on a major platform or a minor manned platform, in lieu of a system that includes firewater, submit the following information to the appropriate MMS GOMR District Supervisor:

**Note:** A major platform is defined as a structure with either six or more completions or zero to five completions with more than one item of production process equipment.

A minor platform is defined as a structure with zero to five completions with one item of production process equipment.

A manned platform is defined as one that is attended 24 hours a day or where personnel are quartered overnight.

1. Your corporate philosophy concerning fire prevention, fire control, and firefighting on OCS platforms.

2. A risk assessment demonstrating that a chemical-only system would not increase the risk to human safety. Provide the following and any other important information in your risk assessment:

a. Platform Description that includes:

- (1) The type and quantity of hydrocarbons (i.e., natural gas, oil) that are produced, handled, stored, or processed at the facility.
- (2) The capacity of any tanks on the facility that you use to store either liquid hydrocarbons or other flammable liquids.
- (3) Whether the facility is manned or unmanned. If manned, the maximum number of personnel on board and the anticipated length of their stay
- (4) The proximity of the platform to other OCS platforms.
- (5) A diagram that depicts:
  - (a) Quarters location,
  - (b) Production equipment location,
  - (c) Fire prevention and control equipment location,
  - (d) Lifesaving appliances and equipment location, and
  - (e) Evacuation plan escape routes from quarters and all manned working spaces to primary evacuation equipment.

b. Hazard Assessment (Facility Specific) that:

- (1) Identifies the likely failures of installed equipment that could lead to a fire.
- (2) Identifies the likely maintenance or repair activities that could lead to a fire.
- (3) Identifies possible ignition sources on the facility.
- (4) Identifies the likely fire scenarios that could occur.
- (5) Estimates the fire/radiant heat exposure that personnel could be subjected to.
- (6) Identifies other possible activities or factors that could lead to a fire.

c. Human Factors Assessment (Not Facility Specific) that:

- (1) Describes the fire-related training your employees and contractors have received.
- (2) Describes the training your employees and contractors have received in fire prevention, control of ignition sources, and control of fuel sources when the facility is occupied.
- (3) Describes the instructions and procedures you have given to your employees and contractors on the actions they should take if a fire occurs.

d. Evacuation Assessment (Facility Specific) that:

- (1) Describes the type and quantity of lifesaving appliances available on the facility.
- (2) Describes the availability of support vessels, or the time needed for support vessels to arrive at the facility.
- (3) Estimates the worst case time needed for personnel to evacuate the facility should a fire occur.

e. Alternative Protection Assessment that:

- (1) Discusses the reasons you are proposing to use an alternative fire prevention and control system.
- (2) Describes the proposed alternative fire prevention and control system/equipment.
- (3) Lists the standards used to design, manufacture, and operate the system/equipment.

- (4) Describes the testing, inspection, and maintenance program you will use to maintain the fire prevention and control equipment in an operable condition.
- f. Conclusion of Risk Assessment that provides a summary of your technical evaluation showing that the alternative system provides an equivalent level of personnel protection for the specific hazards located on the facility.

### **Caveats**

1. If the MMS GOMR has approved your request to use a chemical-only fire suppressant system in lieu of a system that includes a firewater system, and if you make an insignificant change to your platform subsequent to that approval, document the change and maintain the documentation at the facility or nearest field office for MMS review and/or inspection. Do not submit this documentation to the MMS GOMR District Supervisor. If you make a significant change to your platform (for example, placement of a storage vessel with a capacity of 100 barrels or more on the facility), submit a new request, including an updated risk assessment, to the appropriate MMS GOMR District Supervisor for approval.
2. The MMS GOMR District Supervisors are not likely to approve requests to use chemical-only fire prevention and control systems on large or complex manned platforms with densely clustered equipment.

### **Automatic Approvals**

The MMS GOMR hereby grants approval for you to use a 30-pound portable dry chemical unit in lieu of a system that includes firewater, on all platforms that are both *minor* and *unmanned*, as long as you ensure that the unit is available on the platform when personnel are on board.

### **Previous Approvals**

The MMS has evaluated its policy regarding major platforms and minor manned platforms that currently have MMS GOMR approval to use a chemical-only fire prevention and control system in lieu of a firewater system. As a result, the MMS will be reviewing these approvals in the near future and likely will require you to submit the information described in this NTL therefore, we recommend that you review these facilities to determine if the chemical-only system provides the equivalent protection of a firewater system for the egress of personnel should a fire occur.

### **Inoperable Firewater Systems**

If you are required to maintain a firewater system and it becomes inoperable, either (1) shut in your production operations while making the necessary repairs, or make a request to the appropriate MMS GOMR District Supervisor that he grant you a departure under 30 CFR 250.142 to use a chemical-only fire-suppressant system on a temporary basis (for a period up to

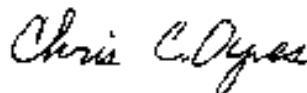
7 days) while you make the necessary repairs. If you are unable to complete repairs during the approved time period because of circumstances beyond your control, the appropriate MMS GOMR District Supervisor may grant extensions to your approved departure for periods up to 7 days.

### **Paperwork Reduction Act of 1995 Statement**

The information collection referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR 250, Subparts A and H. The Office of Management and Budget (OMB) has approved the information collection requirements in these regulations under OMB control numbers 1010-0114 for Subpart A and 1010-0059 for Subpart H. This NTL does not impose additional information collection requirements subject to the Paperwork Reduction Act of 1995.

### **Contacts**

Please direct any questions you may have regarding this NTL to the Production Engineer in the respective MMS GOMR District Office.



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Regional Director