

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

NTL No. 2006-G04

Effective Date: February 22, 2006

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-G09 on this subject. It changes the provision under “Automatic Approvals” to allow for the use of a U.S. Coast Guard type and size rating “B-II” portable dry chemical unit (with a minimum UL Rating (US) of 60-B:C) or a 30-pound portable dry chemical unit, in lieu of a water system, on all platforms that are both minor and unmanned.

**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 water system if the appropriate MMS Gulf of Mexico OCS Region (GOMR) District Manager determines that the use of a chemical system provides equivalent fire protection and control for personnel egress. Please be advised that the MMS GOMR District Managers 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.

**Definitions**

Terms used in this NTL have the following meanings:

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 one on which personnel are quartered overnight.

## Information for 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 water system, submit the following information to the appropriate MMS GOMR District Manager:

1. Your operating philosophy concerning fire prevention, fire protection, fire control, and firefighting on the platform.

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 the following:

- (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) The total volume of flammable liquids (other than produced hydrocarbons) stored on the facility in containers other than bulk storage tanks. Include flammable liquids stored in paint lockers, storerooms, and drums.
- (4) Whether the facility is manned or unmanned.
  - (a) If manned, provide the maximum number of personnel on board and the anticipated length of their stay.
  - (b) If unmanned, provide the number of days per week the facility will be visited, the average length of time spent on the facility per day, the mode of transportation, and whether or not transportation will be available at the facility while personnel are on board.
- (5) The proximity of the platform to other OCS platforms. Identify the platforms you have designated and will use as “safe harbor” in the event an evacuation is necessary. For each, include the heading, distance, operator, whether the platform is manned or unmanned, and whether the platform is equipped with a heliport and/or crane. Discuss the factors you used (e.g., prevailing sea conditions, manned status, accessibility) to determine these designated “safe harbor” platforms.
- (6) 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 all likely fire initiation scenarios (including those resulting from maintenance and repair activities). For each scenario, discuss its potential severity and identify the ignition and fuel sources.
- (2) Estimates the fire/radiant heat exposure that personnel could be subjected to. Show how you have considered designated muster areas and evacuation routes near fuel sources and have verified proper flare boom sizing for radiant heat exposure.

c. Human Factors Assessment (Not Facility Specific) that

- (1) Describes the fire-related training your employees and contractors have received. Include details on the length of training, whether the training was hands-on or classroom, the training frequency, and the topics covered during the training.
- (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. Include those instructions and procedures specific to evacuation. State how you convey this information to your employees and contractor on the platform.

d. Evacuation Assessment (Facility Specific) that

- (1) Provides a general discussion of your evacuation plan. Identify your muster areas (if applicable), both the primary and secondary evacuation routes, and the means of evacuation for both.
- (2) Describes the type, quantity, and location of lifesaving appliances available on the facility. Show how you have ensured that lifesaving appliances are located in the near vicinity of the escape routes.
- (3) Describes the types and availability of support vessels, whether the support vessels are equipped with a fire monitor, and the time needed for support vessels to arrive at the facility.
- (4) 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) Lists the specific standards used to
  - (a) Design the system,
  - (b) Locate the equipment, and
  - (c) Operate the equipment/system.
- (3) Describes the proposed alternative fire prevention and control system/equipment. Provide details on the type, size, number, and location of the prevention and control equipment.
- (4) Describes the testing, inspection, and maintenance program you will use to maintain the fire prevention and control equipment in an operable condition. Provide specifics regarding the type of inspection, the personnel who conduct the inspections, the inspection procedures, and documentation and recordkeeping.

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.

### **Changes After Approval**

If the MMS GOMR has approved your request to use a chemical-only fire suppressant system in lieu of a water 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 Manager. However, if you make a significant change to your platform (e.g., placing a storage vessel with a capacity of 100 barrels or more on the facility, adding production equipment) or if you plan to man an unmanned platform temporarily, submit a new request, including an updated risk assessment, to the appropriate MMS GOMR District Manager for approval.

### **Automatic Approvals**

The MMS GOMR hereby grants approval for you to use a U.S. Coast Guard type and size rating “B-II” portable dry chemical unit (with a minimum UL Rating (US) of 60-B:C) or a 30-pound portable dry chemical unit, in lieu of a water system, 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 water system. As a result, we 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 water 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 (2) request that the appropriate MMS GOMR District Manager grant you a departure under 30 CFR 250.142 to use a firefighting system using chemicals 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 MMS GOMR District Manager may grant extensions to your approved departure for periods up to 7 days.

## Contacts

Please direct any questions you may have regarding this NTL to the Production Engineer in the respective MMS GOMR District Office, as listed below:

District Office	Production Engineer	Telephone	E-mail Address
Houma	Bryan Domangue	(985) 853-5894	bryan.domangue@mms.gov
Lafayette	Michael Hebert	(337) 289-5105	michael.hebert@mms.gov
Lake Charles	Guy Thibodeaux	(337) 480-4605	guy.thibodeaux@mms.gov
Lake Jackson	Stephen Martinez	(979) 266-1006	stephen.martinez@mms.gov
New Orleans	Stephen P. Dessauer	(504) 736-2508	stephen.dessauer2@mms.gov

## 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.

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Chris C. Oynes  
Regional Director