

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

NTL No. 2009-G25

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NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL AND GAS
LEASES AND PIPELINE RIGHT-OF-WAY HOLDERS
ON THE OUTER CONTINENTAL SHELF, GULF OF MEXICO OCS REGION

Shutting In Producing Wells During Rig Moves

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2004-G09, effective May 17, 2004. It specifies that the guidance regarding when you must shut in producing wells during rig moves applies to rigs and related equipment used during well-completion, well-workover, and well decommissioning operations, as well as drilling operations; makes amendments to Appendices B, C, and D; and provides a guidance document statement.

Authority

The regulation at 30 CFR 250.406(b) requires you to shut in all producing wells located in the affected wellbay below the surface and at the wellhead when you: (1) move a drilling rig or related equipment on or off a platform, (2) move or skid a drilling unit between wells on a platform, or (3) move a mobile offshore drilling unit (MODU) within 500 feet of a platform.

The regulations at 30 CFR 250.502 and 250.602 requires all wells in the same well-bay, which are capable of producing hydrocarbons, to be shut in below the surface with a pump-through-type tubing plug, and at the surface with a closed master valve prior to moving well-completion and well-workover rigs and related equipment, unless otherwise approved by the District Manager.

The regulation at 250.1703(f) requires that all decommissioning activities must be conducted in a manner that is safe, does not unreasonably interfere with other uses of the OCS, and does not cause undue or serious harm or damage to the human, marine, or coastal environment.

Procedures

The four appendices to this NTL provide guidance on how you may comply with 30 CFR 250.406(b), 250.502, 250.602, and 250.1703(f). They describe the various types of rigs and phases of rig movement, specify when wells must be shut in (wells need not be shut in if the rig is stacked on location), and delineate the documentation you submit to the appropriate MMS

Gulf of Mexico OCS Region (GOMR) District Office if you request approval of a departure under 30 CFR 250.142.

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 alternative approach for compliance, you may do so, after you receive approval from the appropriate MMS office under 30 CFR 250.141.

Paperwork Reduction Act of 1995 (PRA) 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, D, E, F, and Q. The Office of Management and Budget (OMB) has approved the information collection requirements for Subparts A, D, E, F, and Q under OMB Control Numbers 1010-0114, 1010-0141, 1010-0067, 1010-0043, and 1010-0142, respectively. This NTL does not impose any additional information collection subject to the PRA.

Contact

If you have any questions regarding this NTL, please contact the appropriate MMS GOMR District Office

[original signed]

Lars T. Herbst
Regional Director

Appendices

Appendix A (Mat-supported Jack-up Rigs)

Appendix B (Independent Leg Jack-up Rigs)

Appendix C (Platform Rig Move On/Off; Requires Use of Barge/Heavy Lifting Vessel)

Appendix D (Platform Rig Move On/Off; Requires Use of Rig Crane and Workboats)

APPENDIX A **MAT-SUPPORTED JACK-UP RIGS**

Moving On Location

ACTIVITY	SHUT IN?		INFORMATION NEEDED FOR A DEPARTURE REQUEST
	YES	NO	
Move Rig Within 500 feet/Pin to Seafloor	X		A.1
Jack-up to Airgap		X	
Skid/Cantilever	X		A.2
Install Lines, Hoses, and Ladders		X	
Hammer/Drive Pipe	X		A.3
Move BOP Stack and Riser (Bell Nipple)	X*		A.4

* Only affected wells (i.e., those wells that could be hit by a falling BOP stack)

Moving Off Location

ACTIVITY	SHUT IN?		INFORMATION NEEDED FOR A DEPARTURE REQUEST
	YES	NO	
Move BOP Stack and Riser (Bell Nipple)	X*		A.4
Cantilever Back	X		A.2
Jack Down		X	
Jack Mat Off Bottom and Bring Mat to Tow Position	X		A.1
Move Rig Off Within 500 feet	X		A.1

* Only affected wells (i.e., those wells that could be hit by a falling BOP stack)

DEPARTURE DOCUMENTATION FOR MAT-SUPPORTED JACK-UP RIGS

A.1 Provide the following in your departure request:

- (1) A diagram indicating the horsepower rating of the tow vessels and showing the tow line positioning relative to the rig hull and the well/platform position;
- (2) A statement that you will provide tow vessels with horsepower sufficient to exert an immediate pull from location, and that the tow vessels will remain attached with towlines in tension until the jack-up rig is pinned to seafloor;
- (3) A diagram that shows all prior spud can/mat locations, bottom obstructions, hull standoff distance to platform at water line, mat position and standoff to platform at seafloor, and location of reflectors/buoys used for rig positioning; and
- (4) A statement that all vessels will remain attached and in tension from a time prior to when the mat is pulled off the bottom until the rig is more than 500 feet from the platform.

A.2 Provide the following in your departure request:

- (1) A diagram or photograph showing the storage position and restraint system for the diverter and blowout preventer (BOP) stack; and
- (2) A statement that this equipment will remain properly secured in this storage position during all skid/cantilever operations.

A.3 Provide the following in your departure request:

- (1) Documentation of how the equipment will be moved and properly secured in reference to existing producing wells;
- (2) A description of the well bay area including its height and the distance from the rig floor to the platform deck;
- (3) A description of the method you will use to protect the surrounding producing wells;
- (4) The type of material construction of the platform deck (grating vs. solid decking or steel plate);
- (5) The point load calculations; and
- (6) A diagram from an overhead view indicating the potential fall path radius for a single joint of dropped drive pipe.

A.4 Provide the following in your departure request:

- (1) A diagram indicating the position of the BOP stack, the stack height, and the height of well bay;
- (2) A plat showing the well bay and the path the rig will follow to or from the affected well;
- (3) If there is a deck between the BOP stack and the well bay, a description of the deck protection type and the point load calculations; and
- (4) If the BOP stack is located within the well bay, a statement that affected wells will remain shut in until the BOP stack is secured.

APPENDIX B **INDEPENDENT LEG JACK-UP RIGS**

Moving On Location

ACTIVITY	SHUT IN?		INFORMATION NEEDED FOR A DEPARTURE REQUEST
	YES	NO	
Move Rig Within 500 feet/Pin to Seafloor	X		B.1
Preload	X		B.2
Jack-up to Airgap		X	
Skid/Cantilever	X		B.3
Install Lines, Hoses, and Ladders		X	
Hammer/Drive Pipe	X		B.4
Move BOP Stack and Riser (Bell Nipple)	X*		B.5

* Only affected wells (i.e., those wells that could be hit by a falling BOP stack)

Moving Off Location

ACTIVITY	SHUT IN?		INFORMATION NEEDED FOR A DEPARTURE REQUEST
	YES	NO	
Move BOP Stack and Riser (Bell Nipple)	X*		B.5
Cantilever Back	X		B.3
Jack Down		X	
Jet Legs Free (Legs to MPD) **		X	
Jet Legs Free (Legs from MPD to Free from Seafloor and Rig Within 100 feet)	X		B.6
Rig More than 100 feet and Moving Off Within 500 feet	X		B.6

* Only affected wells (i.e., those wells that could be hit by a falling BOP stack)

** Minimum Penetration Depth (MPD) means the rig hull's buoyant draft during jetting operation in feet, plus twenty (20) feet of mudline penetration on all legs. Example: For a rig with a hull draft of 18 feet during jetting operation, MPD is the point where all legs have a minimum of 38 feet of penetration below the mud line.

DEPARTURE DOCUMENTATION FOR INDEPENDENT LEG JACK-UP RIGS

B.1 Provide the following in your departure request:

- (1) A diagram indicating the horsepower rating of the tow vessels and showing the tow line positioning relative to the rig hull and the well/platform position;
- (2) A statement that you will provide tow vessels with horsepower sufficient to exert an immediate pull from location, and that the tow vessels will remain attached with towlines in tension until the jack-up rig is pinned to seafloor; and
- (3) A diagram that shows all prior spud can/mat locations, bottom obstructions, hull standoff distance to platform at water line, spud can position and standoff to platform at seafloor, and location of reflectors/buoys used for rig positioning.

B.2 Provide the following in your departure request:

- (1) If this is the first independent leg rig at this location, a site-specific soil boring and leg penetration analysis provided by a Geotechnical Engineer having experience in the area to ensure there is no risk of punch through at the specific location or encountering shallow hazards; or
- (2) If this is not the first independent leg rig at this location
 - (a) If you will use existing can holes,
 - (i) The method you intend to use to align the can holes;
 - (ii) Previous preload weight and resulting leg penetration, and the proposed preload weight for this operation. If the planned preload is larger or the spud can size is smaller than historical rig moves, a site-specific soil boring and spud can penetration analysis provided by a Geotechnical Engineer having experience in the area to ensure there is no risk of punch through at the specific location or encountering shallow hazards. If the planned preload is less than or equal to the historical preload(s) and the spud can size is the same or larger than previous spud cans, no additional information is necessary; and
 - (iii) Data on the number of preload cycles and load weights.
 - (b) If you will develop new spud can holes,
 - (i) A diagram showing existing can hole/mat locations and their position relative to the planned can hole locations;
 - (ii) The intended method to establish new can holes and the effect that existing soil disturbances may have on spud can penetration analysis specified in Item iii below;
 - (iii) A site-specific soil boring and spud can penetration analysis provided by a Geotechnical Engineer having experience in the area to ensure there is no risk of punch through at the specific location or encountering shallow hazards; and
 - (iv) Data on the number of preload cycles and load weights.

B.3 Provide the following in your departure request:

- (1) A diagram or photograph showing the storage position and restraint system for the diverter and blowout preventer (BOP) stack; and
- (2) A statement that this equipment will remain properly secured in this storage position during all skid/cantilever operations.

B.4 Provide the following in your departure request:

- (1) Documentation of how the equipment will be moved and properly secured in reference to existing producing wells;
- (2) A description of the well bay area including its height, and the distance from the rig floor to the platform deck;
- (3) A description of the method you will use to protect the surrounding producing wells;
- (4) The type of material construction of the platform deck (grating vs. solid decking or steel plate);
- (5) The point load calculations; and
- (6) A diagram from an overhead view indicating the potential fall path radius for a single joint of dropped drive pipe.

B.5 Provide the following in your departure request:

- (1) A diagram indicating the position of the BOP stack, the stack height, and the height of well bay;
- (2) A plat showing the well bay and the path the rig will follow to or from the affected well;
- (3) If there is a deck between the BOP stack and the well bay, a description of the deck protection type and the point load calculations; and
- (4) If the BOP stack is located within the well bay, a statement that affected wells will remain shut in until the BOP stack is secured.

B.6 Provide the following in your departure request:

- (1) A diagram indicating the horsepower rating of the tow vessels and showing the tow line positioning relative to the rig hull and the well/platform position;
- (2) A statement that all vessels will remain attached and in tension from a time prior to when the spud cans are pulled above the MPD until the rig is more than 500 feet from the platform; and
- (3) A statement that you will provide tow vessels with horsepower sufficient to exert an immediate pull from location, and that the tow vessels will remain attached with towlines in tension until the jack-up rig is more than 500 feet from platform.

APPENDIX C
PLATFORM RIG MOVE ON/OFF
Requires Use of Barge/Heavy Lifting Vessel

ACTIVITY	SHUT IN?		INFORMATION NEEDED FOR A DEPARTURE REQUEST
	YES	NO	
Move Barge Within 500 feet of Platform	X*		C.1 and C.3
Perform Lifts During Rig Up	X		C.2
Move BOP Stack/BOP Riser	X**		C.3
Install Lines, Hoses, and Ladders		X	
Hammer/Drive Pipe	X		C.4
Skidding Between Wells	X		C.5
Perform Lifts During Rig Down	X		C.2 and C.3
Move Barge Off Within 500 feet of Platform	X		C.1 and C.3

* Shut-in required only when moving barge into location and securing same. Once secured, production may resume until heavy lifting begins.

** Only affected wells (i.e., those wells that could be hit by a falling BOP stack)

DEPARTURE DOCUMENTATION FOR PLATFORM RIG MOVE

C.1 Provide the following in your departure request:

- (1) A diagram indicating the horsepower rating of the tow/transport vessels and the means of positioning relative to platform;
- (2) A statement that you will provide tow vessels with horsepower sufficient to exert an immediate pull from location, and that the tow vessels will remain attached with towlines in tension until the barge is properly secured while adjacent to facility; and
- (3) If you will use dynamically positioned vessels, the downstream position of the vessel between major lifts.

C.2 Provide the following in your departure request:

- (1) If you will be lifting to/from platform area(s) where wells and process equipment are not located,
 - (a) Information that shows that the crane load capacity is sufficient for the lift (boom angle, dynamic vs. static); and
 - (b) Information that shows the crane location, lift path, and set down area for each lift. Make sure that set down areas confirm there are no hydrocarbon process lines or wells affected by the lifting path.
- (2) If you will be lifting to/from area(s) affected by wells and/or process equipment,
 - (a) Information that shows that the crane load capacity is sufficient for the lift (boom angle, dynamic vs. static);
 - (b) Platform structural data and point load calculations showing that the facility, including production process systems, can withstand a dropped object;

(c) A lift sequence plan describing the order of lifts and lift positioning on platform deck relative to well bay area and production process equipment; and

(d) A statement that you will resume production of the affected wells only after the rig substructure is in place and the well bay is protected from impacts.

C.3 Provide the following in your departure request:

(1) A diagram indicating the position of the BOP stack, the stack height, the height of well bay, and the path the rig/barge will use to make the move;

(2) If there is a deck between the BOP stack and the well bay, a description of the deck protection type and the point load calculations (thickness of deck and beam spacing); and

(3) If the BOP stack is located within the well bay, a statement that affected wells will remain shut in until the BOP stack is secured.

C.4 Provide the following in your departure request:

(1) Documentation of how the equipment will be moved and properly secured in reference to existing producing wells;

(2) A description of the well bay area including its height and the distance from the rig floor to the platform deck;

(3) A description of the method you will use to protect the surrounding producing wells;

(4) The type of material construction of the platform deck (grating vs. solid decking or steel plate);

(5) The point load calculations; and

(6) A diagram from an overhead view indicating the potential fall path radius for a single joint of dropped drive pipe.

C.5 Provide the following in your departure request:

(1) A diagram or photograph showing the storage position and restraint system for the diverter and blowout preventer (BOP) stack; and

(2) A statement that this equipment will remain properly secured in this storage position during all skidding operations.

APPENDIX D
PLATFORM RIG MOVE ON/OFF
Requires Use of Rig Crane and Workboats

ACTIVITY	SHUT IN?		INFORMATION NEEDED FOR A DEPARTURE REQUEST
	YES	NO	
Move Boat(s) & Secure or DP at Platform		X	
Perform Lifts during Rig Up	X		D.1
Move BOP Stack/BOP Riser	X*		D.2
Install Lines, Hoses, and Ladders		X	
Hammer/Drive Pipe	X		D.3
Skidding Between Wells	X		D.4
Perform Lifts During Rig Down	X		D.1 and D.2
Move Boat(s) & Secure or DP at Platform		X	

* Only affected wells (i.e., those wells that could be hit by a falling BOP stack)

DEPARTURE DOCUMENTATION FOR PLATFORM RIG MOVE

D.1 Provide the following in your departure request:

(1) If you will be lifting to/from platform area(s) where wells and process equipment are not located,

(a) Information that shows that the crane load capacity is sufficient for the lift (boom angle, dynamic vs. static); and

(b) Information that shows the crane location, lift path, and set down area for each lift.

Make sure that set down areas confirm there are no hydrocarbon process lines or wells affected by the lifting path.

(2) If you will be lifting to/from area(s) affected by wells and/or process equipment,

(a) Information that shows that the crane load capacity is sufficient for the lift (boom angle, dynamic vs. static);

(b) Platform structural data and point load calculations showing that the facility, including production process systems, can withstand a dropped object;

(c) A lift sequence plan describing the order of lifts and lift positioning on platform deck relative to well bay area and production process equipment; and

(d) A statement that you will resume production of the affected wells only after the rig substructure is in place and the well bay is protected from impacts.

D.2 Provide the following in your departure request:

(1) A diagram indicating the position of the BOP stack, the stack height, the height of well bay, and the path the rig/platform crane will use to make the move;

(2) If there is a deck between the BOP stack and the well bay, a description of the deck protection type and the point load calculations (thickness of deck and beam spacing); and

(3) If the BOP stack is located within the well bay, a statement that affected wells will remain shut in until the BOP stack is secured.

D.3 Provide the following in your departure request:

- (1) Documentation of how the equipment will be moved and properly secured in reference to existing producing wells;
- (2) A description of the well bay area including its height and the distance from the rig floor to the platform deck;
- (3) A description of the method you will use to protect the surrounding producing wells;
- (4) The type of material construction of the platform deck (grating vs. solid decking or steel plate);
- (5) The point load calculations; and
- (6) A diagram from an overhead view indicating the potential fall path radius for a single joint of dropped drive pipe.

D.4 Provide the following in your departure request:

- (1) A diagram or photograph showing the storage position and restraint system for the diverter and blowout preventer (BOP) stack; and
- (2) A statement that this equipment will remain properly secured in this storage position during all skidding operations.