

Provide Clarification, Description, and Interpretation with Regard to Pipeline Requirements

In Reply Refer To: MS 5232

Apr 18 1991

Gentlemen:

The purpose of this letter is to provide clarification, description, and interpretation of the requirements contained in 30 CFR 250.150 through 30 CFR 250.164 (*Federal Register*, April 1, 1988, 53 FR 10756-10761) which pertain to the approval, installation, operation, maintenance, and abandonment of lease term and right-of-way (ROW) pipelines and to the granting, modification, and relinquishment of pipeline ROW's in the Gulf of Mexico (GOM) Outer Continental Shelf (OCS). Accordingly, those regulations and this letter supersede all previous pipeline regulations and Minerals Management Service (MMS) Report No. 84-0015, *Pipeline Guidelines and Procedures*.

The MMS GOM OCS Region has developed the following guidance listed by regulatory reference:

1. 250.150(a)

All OCS pipelines shall be installed in accordance with the provisions of Notice to Lessees and Operators (NTL) No. 83-3, Section IV.B.

When installing a pipeline that will tie in to or cross an existing pipeline, that portion of the existing pipeline in the vicinity of the tie-in or crossing shall be inspected to ensure that proper cover has been maintained. If it appears that environmental or other factors have detrimentally affected the burial depth of the pipe (for pipelines in water depths less than 200 feet) or the protective cover of an appurtenance, the Regional Supervisor, Field Operations shall be notified immediately so that appropriate corrective measures can be taken.

When installing a hot tap on an existing pipeline located in water depths less than 200 feet, the pipeline shall be inspected in the vicinity of the proposed work to ensure that the proper cover has been maintained. If it is determined that environmental or other factors have detrimentally affected the burial depth of the pipe, a plan of corrective action shall be submitted to the Regional Supervisor, Field Operations for approval within 30 days of discovery.

2. 250.150(b) and (d)

Applications for the approval of the installation of a lease term or ROW pipeline or for the modification or abandonment of an existing lease term or ROW pipeline, and applications for the granting of a pipeline ROW or for the approval

of the modification or relinquishment of an existing pipeline ROW shall be made to:

Regional Supervisor, Field Operations (MS 5232)
Minerals Management Service
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Please allow at least 30 days for the processing of applications for the approval of the installation of a lease term or ROW pipeline and the granting of a pipeline ROW.

3. 250.150(b)

Pursuant to 250.4(b), no modification or abandonment of a ROW pipeline may commence until an application has been submitted to and approved by the Regional Supervisor, Field Operations.

An application for the installation of a lease term pipeline will not be approved until the platform upon which the proposed pipeline is to originate is described in detail in an approved Development Operations Coordination Document.

Actions for which an application for the modification of an existing lease term or ROW pipeline shall be submitted for approval include, but are not limited to, changing a pipeline route, installing a subsea tie-in valve, adding safety equipment, changing service or flow direction of a pipeline, and installing a pig trap.

An application to maintain a ROW grant in effect shall be submitted for approval to the Regional Supervisor, Field Operations if the associated ROW pipeline will not be used for the purpose for which the ROW grant was made for a period of more than 90 consecutive days.

4. 250.150(c)

All lease term pipelines that are placed out of service are under the jurisdiction of the Department of Interior (DOI) and the requirements of 250.156(b) shall be applicable.

In accordance with 250.3(a), approval may be given to use new or alternative techniques, procedures, equipment, or activities if such techniques, procedures, equipment, or activities afford a degree of protection, safety, or performance equal to or better than that intended to be achieved by the requirements of 30 CFR 250, Subpart J.

5. 250.153(a)(1)

The Regional Supervisor, Field Operations has determined that a pipeline under DOI jurisdiction (DOI pipeline) which is 8 inches in diameter or less and installed in a water depth of less than 200 feet shall be buried to a depth of at least 3 feet unless it is to be installed in an area determined to be prone to self-burial. Please be reminded that the U.S. Army Corps of Engineers may have more stringent burial requirements for a pipeline that enters or crosses a safety fairway or an anchorage area.

6. 250.155(a)

Each DOI pipeline route in the GOM shall be inspected at least monthly for indication of pipeline leakage. These inspections can be made by using a helicopter, marine vessel, or other approved means.

7. 250.155(b)

The following formula is used to calculate the cathodic protection life expectancy of a DOI pipeline:

$$\text{LIFE EXPECTANCY (YEARS)} = \frac{3.82 \times 10^4 \times w}{D \times I \times R}$$

$$D \times I \times R$$

where:

w = Weight of unit anodes (lbs)

D = Diameter of pipe (inches)

I = Interval -- length of pipe (ft) / total number of anodes

R = Rate of consumption (lbs/amp-year) -- The values of R for the various galvanic anode alloys are obtained from Table 1.B of NACE Standard RPO176-83.

8. 250.156(b)

A DOI pipeline that has not been used for more than 30 consecutive days shall be considered to be out of service. The 1-year and 5-year time periods referred to in 250.156(b)(2) and (3), respectively, shall begin on the date that the pipeline was taken out of service.

9. 250.156(b)(2)

When it is estimated that a DOI pipeline will be out of service for more than one year, the pipeline shall be *immediately* flushed and filled with inhibited seawater. Records of these actions shall be retained at the nearest OCS facility and be made available to MMS inspectors upon request.

10. 250.156(b)(3)

When it is determined that a DOI pipeline will be out of service for five years or more, an application for its *immediate* abandonment shall be submitted to the Regional Supervisor, Field Operations, for approval.

11. 250.157(a)

In accordance with NTL No. 88-11, the application required by this paragraph shall include an analysis of the evidence and consequences of geological phenomena (such as hydrocarbon charged sediments, seismic wipe-out zones, anomalous mounds or knolls, gas vents, or oil seeps) that could support chemosynthetic organisms when a proposed pipeline is to be installed in water depths greater than 400 meters.

The application required by this paragraph shall include a brief description of the onshore base that will be used to support the pipeline activities including information as to whether the facilities at the base are existing, proposed, or are to be expanded; a brief discussion of the support vessels to be used and information concerning their frequency of travel; and a map showing the location of the activity relative to the shoreline which depicts proposed transportation routes.

The application required by this paragraph shall include a brief description of the method that will be used to install the pipeline.

If a proposed lease term pipeline will cross an existing pipeline ROW, the application required by this paragraph shall include proof that the holder of each such pipeline ROW has been notified.

12. 250.157(a)(1)

For a pipeline greater than 5,000 feet in length, the minimum scale for the plat required by this paragraph shall be 1 inch = 2,000 feet. For a pipeline 5,000 feet or less in length, the minimum scale shall be 1 inch = 1,000 feet. The plat shall not be a copy that has been enlarged or reduced.

The plat required by this paragraph shall identify the operator or holder and the designation of all platforms and pipelines connected to or crossed by the

proposed pipeline. It shall also identify all safety fairways and anchorage areas that the proposed pipeline will enter or cross and show the x-y coordinates and latitude and longitude of each of the following key points: where the proposed pipeline crosses a fairway, anchorage area, or lease boundary; the location of subsea valves, taps, tie-ins, and manifold assemblies; the location of pipeline crossings, pipeline end-points, and points throughout a pipeline's change of direction; and where the pipeline crosses into State jurisdiction.

13. 250.157(a)(2)

The schematic drawing required by this paragraph shall be accompanied by a drawing that shows how each pipeline riser will be protected from physical damage and a discussion of any flexible pipe that will be used including the name of the manufacturer and the design specifications.

14. 250.157(a)(3)(x)

The discussion required by this paragraph shall be accompanied by a drawing which shows the protection to be afforded to the proposed pipeline at crossings, subsea tie-ins, and other potential obstructions.

If any valve, tap, subsea tie-in, or capped line is to be covered with protective covering (e.g., sand bags, cages, domes, mats), the discussion required by this paragraph shall be accompanied by (1) a drawing which shows the specifications of the protective covering and the equipment to be protected, (2) the x-y coordinates of the location of the protective covering, (3) a description of the relationship of the protective covering to the mud line, (4) a discussion of any anchor pins or sand bags that will be used to hold the protective covering in place, (5) a description of the cathodic protection system for the protective covering, if appropriate, and (6) a discussion of plans for maintaining the protective covering.

15. 250.157(a)(5)

For ROW pipelines, the shallow hazards survey report required by this paragraph shall be prepared in accordance with the provisions of paragraph III.D. of NTL No. 83-3. For lease term pipelines, an analysis to determine the existence of any seafloor or subsurface geologic and manmade features and conditions which may have an adverse effect on the proposed operations shall be included in lieu of the shallow hazards survey report. This analysis shall adhere to the provisions of paragraph II.D of NTL No. 83-3.

The archaeological resource report required by this paragraph shall be prepared in accordance with the provisions of Enclosure No. 2 of NTL No. 75-3 (Revision No. 1). This report is *not* required where the area to be disturbed has been sufficiently covered in a previously submitted archaeological resource report

(lease term pipelines only) or is not in an area of archaeological resource sensitivity.

When shallow hazard and archaeological survey reports are required, two copies shall be submitted with the application. On a case-by-case basis, a copy of high-resolution survey data may be requested.

16.250.157(b)

An application to modify a pipeline by installing a hot tap shall include the design specifications and installation procedures.

The application referred to in the last paragraph of Item No. 3 above shall include the date that pipeline operations ceased or were suspended and the estimated time that the associated pipeline will not be used for the purpose that the ROW grant was made.

17.250.158

The notifications required by paragraphs (a), (c), (d), (e) of this section shall be made by calling the Pipeline Unit, Monday through Friday, between the hours of 8 a.m. and 4:30 p.m., at (504) 736-2545.

If a serious accident, death or serious injury, fire, explosion, or oil spill involves a pipeline, notification shall be made immediately by calling the Pipeline Unit at (504) 736-2545 or by calling

Mr. Frank Torres at (504) 347-6095 during nonduty hours. These calls are in addition to those notifications required by 250.19(a) and (b) and 250.41(c).

The reports required by paragraphs (b), (c), (e), (f), (g), and (h) of this section shall be submitted to:

Regional Supervisor, Field Operations (MS 5232)
Minerals Management Service
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

18.250.158(b)

The plat included in the report required by this paragraph shall be based on the North American Datum of 1927.

For a pipeline greater than 5,000 feet in length, the minimum scale for the plat included in the report required by this paragraph shall be 1 inch = 2,000 feet. For

a pipeline 5,000 feet or less in length, the minimum scale shall be 1 inch = 1,000 feet. The plat shall not be a copy that has been enlarged or reduced.

The plat included in the report required by this paragraph shall contain the same key points and other information listed in the second paragraph of Item No. 12 above.

Each plat included in the report required by this paragraph which depicts a lease term pipeline shall be certified by a registered engineer or land surveyor. The plat certifications for both lease term and ROW pipelines shall certify the location of the pipeline as laid, not the location of the lay barge or buoys.

A copy of the plat included in the report required by this paragraph shall also be submitted to:

NOAA-NOS-OCS
Chief, Nautical Data Branch
N/CS 26
1315 East West Highway
Silver Spring, Maryland 20910-3282

The report required by this paragraph shall include information on the type, size, weight, number, and spacing of any anodes that were installed.

If any valve, tap, subsea tie-in, or capped line was covered with a protective covering, the report required by this paragraph shall include a description of the relationship of the protective covering and any anchor pins or sand bags to the mud line.

19.250.158(c)

The notification required by this paragraph shall be made within 48 hours of the time a pipeline is determined to be out of service.

The written confirmation required by this paragraph for a DOI pipeline that has been out of service for more than 60 days shall include an estimate of the total time that the pipeline is to remain out of service.

When a DOI pipeline that has been out of service for more than 60 days is to be reactivated, a notification of such action shall *immediately* be made to the Regional Supervisor, Field Operations. After receiving such notification, the Regional Supervisor, Field Operations may require that the reactivation procedures be submitted for review and acceptance prior to conducting the work.

20.250.158(e)

After receiving the notification of a pipeline repair, the Regional Supervisor, Field

Operations may require that a detailed repair procedure be submitted for review and acceptance prior to conducting the work. The report required by this paragraph shall include the location of the repair; specifications of any new pipe, clamps, or other equipment; a step-by-step discussion of the repair procedure; and the data resulting from any required test.

21. 250.160(a)

Each proposed ROW pipeline shall require a separate pipeline ROW grant, and each request that proposes the installation of a structure as an appurtenance to the proposed pipeline shall include all of the information required by 250.131(b).

Each request for a pipeline ROW grant shall state that it is being made pursuant to 43 U.S.C. 1334(e) and the regulations contained in 30 CFR 250, Subpart J and contain a consent to be bound by the provisions of the OCS Lands Act, as amended, and these regulations in the event the pipeline ROW is granted.

22. 250.160(c)

The list required by this paragraph may show the designated operator(s) in lieu of lessees if such operator has been designated as an agent of the lessee(s) and is authorized to receive notice.

23. 250.161(d)

Should a proposed pipeline ROW enter or cross any safety fairway or anchorage area, a copy of the approved U.S. Army Corps of Engineers permit shall be submitted.

24. 250.163(a)

Applications for the approval of the assignment of a pipeline ROW grant shall be made to:

Bureau of Safety and Environmental Enforcement
Office of Regional Operations
Attention: Pipeline Section (MS 5232)
Gulf of Mexico OCS Region
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123-2394

Sincerely,
[signed] J. Rogers Percy
Regional Director