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

NTL No. 92-02

NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL AND GAS LEASES ON
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 90-03 and is provided pursuant to the
authority prescribed in 30 CFR 250.4(b). In accordance with the provisions of 30 CFR 250.5(a),
250.112(i), 250.114, 250.143(a), (b), and (c), and Section 22 of the Lease Agreement which
pertains 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 OCS lease is properly removed and the site cleared so as not to conflict with
other uses of the OCS.

Based on knowledge gained from the application of NTL’s 90-01 and 90-03 over the past two years,
the site clearance committee recommended changes which would produce adequate, reasonable,
and workable MMS Regulations regarding site clearance operations. Such Regulations are
presently being formulated and, during the interim, this NTL has been developed based on the
recommendations. It shall remain in effect from the date of issue until revoked, modified, or
superseded by revised Regulations.

1. Paragraphs 250.112(i) and 250.143(b) of the Regulations require all abandoned well and
platform locations to be cleared of all obstructions present as a result of oil and gas activities. For
clearance purposes, the locations shall be as defined below:

   a. Exploratory or delineation wells drilled with a Mobile Offshore Drilling Unit
      (MODU) - The area covered by a 300-foot radius 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. A procedural plan for site clearance verification of platform or structure abandonments
(paragraphs 1.b. and c.) shall be developed by the lessee and submitted to the MMS Regional
Supervisor, Field Operations, for approval with the permit application for platform or structure
removal. For well abandonments (paragraph 1.a.), a similar plan shall be submitted to the District
Supervisor for approval when submitting the Sundry Notice for well abandonment. As a minimum, site clearance shall be verified by the applicable method listed in paragraph 2.a. Vessels used for site clearance verification operations shall 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 1.b. and c. above and located in water depths less than 300 feet shall 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 1.a. above need not be trawled, but shall 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 shall 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 shall not 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 in areas where pipelines, shipwrecks, or hangs (i.e., fisherman’s contingency fund hangs) are known to exist, the following guidelines are applicable:
(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 which are buried, and for which no obstructions (such as valves) exist above the mudline, 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 which are eight inches in diameter or larger, and for unburied smaller diameter pipelines which have obstructions (e.g., valves) present, trawling shall be conducted no closer than 100 feet to either side and in the same direction as (parallel to) the pipeline. Trawling shall not be conducted across the pipeline.

(e) For unburied active pipelines which 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 shall not be carried out across the pipeline.

(f) The MMS recommends 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 shall 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. Any modification of the trawling requirements at a site must be approved by the Regional Supervisor, Field Operations. All oil and gas related objects encountered by the trawl shall be removed from the seabed and reported as specified below unless otherwise approved by the Regional Supervisor, Field Operations. Any snag on a grid line that is not recovered by the trawl must be removed and the line retrawled. 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 shall be at the discretion of the trawling contractor.

c. For a well site (paragraph 1.a.), the lessee shall notify the District Supervisor at least 48 hours prior to conducting the clearance survey. For a caisson or platform site (paragraph 1.b. or c.), the Regional Supervisor, Field Operations, must receive at least a 48-hour prior notice.

3. Within 60 days after completion of a platform or structure removal/abandonment operation, or as otherwise approved by the Regional Supervisor, Field Operations, site clearance verification shall be completed as specified in the approved plan. Until site clearance verification procedures have been completed, the location shall be marked as a hazard to navigation in accordance with U.S. Coast Guard regulations unless otherwise approved by the Regional Supervisor, Field Operations. Verification letters from the trawling contractor shall be submitted with the subsequent Sundry Notices and Reports on Wells, Form MMS 9-331, or report of platform or structure removal and, as appropriate, shall include the following:

a. The date(s) the work was performed and vessel involved.

b. 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 which 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 which 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:

(1) pipe  (4) structural shapes  (7) long wire rope  
(2) grating  (5) large tires  (8) large hoses  
(3) plate  (6) batteries

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

c. 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.

d. A letter signed by an authorized lessee/operator company representative stating
that he/she witnessed the verification trawling survey shall also be submitted with Form MMS 9-331 or report of platform or structure removal.

e. All reports, forms, and letters shall be submitted to the MMS no later than 30 days following completion of site clearance verification activities.

(Sgd.) J. Rogers Pearcy
Regional Director
Gulf of Mexico OCS Region
Minerals Management Service

May 28, 1992
Date