

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

NTL No. 2005-G20

Effective Date: October 24, 2005

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

Damage Caused by Hurricanes Katrina and Rita

This NTL supersedes NTL 2005-G16. The Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) is issuing this Notice to Lessees and Operators and Pipeline Right-of-way Holders (NTL) pursuant to 30 CFR 250.103 and 30 CFR 250.106(b) and (c) to describe the inspections you need to conduct and the plans and reports you need to prepare because of the known and potential damage to OCS facilities caused by Hurricane Katrina when it struck land on August 29, 2005, and Hurricane Rita when it struck land on September 24, 2005.

OCS Platforms and Structures

Pursuant to 30 CFR 250.901(a)(4) and 250.920(a), (b), (c), and (e), you must periodically inspect OCS platforms and structures (platforms) in accordance with the provisions of American Petroleum Institute Recommended Practice 2A-WSD, Twenty-First Edition (API RP 2A-WSD), Section 14, Surveys.

Subsection 14.4.3 of API RP 2A-WSD requires that you conduct a Level I survey (above-water visual inspection) of the platform after direct exposure to a design environmental event (e.g., hurricane). Therefore, you must perform a Level I survey on all platforms that were exposed to hurricane force winds (74 miles per hour (mph) or greater) from Hurricanes Katrina and Rita.

Subsection 14.3.2 of API RP 2A-WSD requires you to conduct a Level II survey (general underwater visual inspection by divers or remotely operated vehicle (ROV)) of the platform when the Level I survey indicates that underwater damage may have occurred. In addition, subsection 14.4.3 of API RP 2A-WSD requires you to conduct a Level II survey of the platform after severe accidental loading, such as a large object (e.g., boat landing, sump, staircase) being knocked loose and potentially causing structural damage to the platform as it fell to the seafloor.

Subsection 14.3.3 of API RP 2A-WSD prescribes a Level III survey (underwater visual inspection of areas of known or suspected damage) when a Level II survey detects significant structural damage.

Subsection 14.3.4 of API RP 2A-WSD prescribes a Level IV survey (underwater nondestructive testing of areas of known or suspected damages), based on the results of a Level III survey.

In light of these requirements and the numerous reports of severe damage to platforms (both above and below the water line) along the path of Hurricanes Katrina and Rita, the MMS GOMR has determined that you must conduct the following surveys:

Survey Level	Platform Category
I & II	All platforms located east of a line drawn between the following two points: Point 1 (Longitude - 92.5 ° W; Latitude 27.0 ° N) Point 2 (Longitude - 94.8 ° W; Latitude 29.8 ° N)
III	Level III underwater surveys are required for: 1. All platforms that experienced wave loading on the deck. 2. All platforms where Level II survey results indicate a Level III survey is necessary.
IV	Detection of significant structural damage during a Level III survey or if visual inspection alone cannot determine the extent of damage.

Begin immediately to conduct the required surveys. We encourage you to inspect first the older platforms located nearest the eye center storm tracks, and then gradually inspect those platforms toward the outer limits of the described area. Make sure that you complete all surveys by May 5, 2006. Complete all work to correct any damage you find during a platform survey before June 1, 2006.

Make every attempt to complete the required underwater surveys before you man any of the platforms. If it is operationally impractical for you to wait to complete the inspections before you man a platform, make sure that you:

- a. Develop a detailed, comprehensive around-the-clock weather monitoring plan;
- b. Comply with U.S. Coast Guard regulations regarding ingress/egress to the boat landing; and
- c. Provide 24-hour full radio communications between a boat and the platform.

In addition, if your Level II or Level III surveys find structural damage, do not man the platform until you complete a structural analysis and perform any necessary repairs. Please be reminded that 30 CFR 250.900(b)(3) and 30 CFR 250.905 require you to obtain approval from the MMS GOMR before you make major repairs of any damage.

By November 4, 2005, submit the information listed below by e-mail to structures@mms.gov:

- A list of all your OCS platforms and other structures that are required to be surveyed.
- For each listed structure, an initial inspection plan that generally describes the work you will perform to determine the condition of the structure; and
- A timetable that shows how you will complete all inspections by May 5, 2006.

The MMS GOMR will review the initial inspection plans and advise you concerning their acceptability. As you gain experience from your inspection efforts, you may submit amendments to your list and inspection plans for our consideration. Thoroughly justify all requested changes. Further, submit an amendment to your inspection plan whenever the results of a Level II survey require you to conduct a Level III survey.

Submit the inspection results and subsequent updates by the first Friday of each month as follows:

December 2, 2005
 January 6, 2006
 February 3, 2006
 March 3, 2006
 April 7, 2006
 May 5, 2006

OCS Pipelines

Pursuant to 30 CFR 250.1005(a), you must conduct inspections of pipeline routes at intervals and using methods prescribed by MMS. Under this authority, and because of the numerous reports of severe damage to OCS pipelines along the paths of Hurricanes Katrina and Rita, the MMS GOMR hereby directs you to conduct the following inspections by May 5, 2006, for pipelines located east of a line drawn between the following two points:

Point 1 (Longitude - 92.5 ° W; Latitude 27.0 ° N)
 Point 2 (Longitude - 94.8 ° W; Latitude 29.8 ° N)

1. Pipeline Tie-in and Crossing Inspections - Conduct an underwater visual inspection using divers or ROV, a scanning sonar processor, a 500-kHz sidescan sonar in combination with a magnetometer, or other equipment acceptable to the MMS GOMR of each of your OCS pipeline tie-ins and crossings in water depths less than 300 feet. Design each inspection to determine whether any valves or fittings became exposed and to determine the extent of any damage, including damage to protective devices, mats, and sandbags. If during the course of inspecting pipeline tie-ins and crossings there are indications of pipeline movement, conduct an underwater pipeline inspection regardless of water depth to determine the extent of movement or damage.

2. Pipeline Riser Inspections - Conduct a visual inspection of the above-water portion of each pipeline riser in all water depth ranges. If applicable, conduct this riser inspection in conjunction with the required platform Level I survey described above. Inspect the riser and riser clamps for damage. If this inspection indicates that damage may have occurred, conduct an underwater riser and pipeline inspection to determine if the pipeline has been displaced or exposed.

3. Pipeline Steel Catenary Riser Inspections - Conduct an inspection using divers or ROV of the underwater portions of each of your OCS pipeline steel catenary risers. Inspect the riser, vortex-induced vibration (VIV) suppression devices, and the connection point (flexible element, titanium stress joint, etc.) for damage.

The chart below summarizes and clarifies those portions of a pipeline that require inspections according to the water depth range.

If the water depth range is	Then inspect all
0 to 299 feet	subsea tie-ins and pipeline crossings.
All water depths	risers, including steel catenary risers.

4. Mobile Drilling Units (MODU's). If you suspect that an adrift MODU or other floating structure may have impacted any of your pipelines, conduct an underwater pipeline inspection regardless of water depth to determine whether the structure caused any damage to the pipeline.

Submit the inspection results and subsequent updates to pipelines@mms.gov by the first Friday of each month as follows:

November 4, 2005
December 2, 2005
January 6, 2006
February 3, 2006
March 3, 2006
April 7, 2006
May 5, 2006

Complete all work to correct any damage you find during a pipeline inspection before June 1, 2006. Be reminded that before you conduct any repairs, you are to submit a repair procedure for review and acceptance to the MMS GOMR Pipeline Section.

If you haven't already done so, perform a leak test before you return to service any pipeline located east of the line described above. Make sure that the leak test successfully tests the integrity of the pipeline. When you conduct a leak test, make sure that you use a stabilized pressure that is capable of detecting all leaks, use pressure gauges and recorders that are sufficiently accurate to determine whether the pipeline is leaking during the test, and conduct the test for at least two hours during daylight hours. For major oil pipelines, provide aerial surveillance of the pipeline route while you perform the test.

Paperwork Reduction Act of 1995 Statement

The Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3504 et seq.) requires us to inform you that the MMS collects this information to carry out its responsibilities under the OCS Lands Act, as amended. The MMS will use the information to determine if the structural integrity of platforms and pipelines may have been adversely affected by Hurricanes Katrina and Rita, if any damage poses a threat to continued safe operations or the environment, and, if so, whether to require correction action on damaged structures. Responses are mandatory. No proprietary data are collected. We estimate the public reporting burden to average 760 hours per respondent. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid Office of Management and Budget (OMB) control number. The OMB has approved the collection of information and assigned OMB control number 1010-0163. Direct any comments regarding the burden estimate or any other aspect of this collection of information to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, Department of the Interior, 1849 C Street, NW, Washington, D.C. 20240.

Contacts

Please address any questions regarding platform inspections or reports to Mr. Tommy Laurendine of the MMS GOMR Office of Technical and Structural Support by telephone at (281) 873-1852 or (281) 755-5213, or by e-mail at structures@mms.gov. Address any questions regarding pipeline inspections or reports to Mr. Alex Alvarado of the MMS GOMR Pipeline Section by telephone at (504) 736-2547 or (504) 452-3562, or by e-mail at pipelines@mms.gov.

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Chris C. Oynes
Regional Director