

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

NTL No. 2009-G08

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NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL AND GAS LEASES,  
OUTER CONTINENTAL SHELF, GULF OF MEXICO OCS REGION

**Global Positioning Systems for Mobile Offshore Drilling Units**

This Notice to Lessees and Operators (NTL) provides guidance and requirements for:

1. Outfitting all mobile offshore drilling units (MODU) that are moored, including jackup rigs, with multiple global positioning system (GPS) transponders that are installed and operational by July 01, 2009; and
2. Providing the Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) with access to real-time GPS location data; and
3. Contacting the MMS GOMR Continuity of Operations Plan (COOP) office when a MODU moves off location during a storm event.

This NTL provides this guidance and requirements pursuant to 30 CFR 250.106(c), 30 CFR 250.107(d), 30 CFR 250.280(b), and 30 CFR 250.417(a). Specifically, under

- 30 CFR 250.106(c), the MMS GOMR regulates operations to prevent damage to or waste of any natural resource, property, or the environment.
- 30 CFR 250.107(d), the MMS GOMR may require additional measures to ensure the use of best available and safest technology.
- 30 CFR 250.280(b), you must take appropriate measures to meet emergency situations.
- 30 CFR 250.417(a), you must demonstrate that the MODU you plan to use is capable of performing at the proposed drilling location.

**Background**

The effects of several hurricanes in the past few years have been detrimental to oil and gas operations on the OCS in the Gulf of Mexico. These effects included structural damage to fixed production platforms, platform rigs, semi-submersibles, jack-up rigs, and other equipment and facilities. Moreover, a major concern for MMS is the problem of a MODU being moved off location by a storm event. When a MODU is displaced by a storm event, there are potentially serious consequences if it strikes or otherwise damages other facilities, pipelines, or vessels. In March 2009, an incident occurred that involved a large oil tanker striking a missing jack-up rig that had drifted off location and sunk during Hurricane Ike in 2008.

A GPS device provides a method to locate and track a displaced MODU during and after a storm event. This NTL only involves the aspect of using real-time GPS tracking while the MODU is still afloat. However, the MMS GOMR encourages you to investigate and consider implementing any new or existing technologies that will enable you to locate a sunken MODU. Having both the GPS real-time data and sunken MODU location will provide a valuable tool to prevent future incidents involving a lost or sunken MODU.

### **GPS Tracking Systems**

1. Outfit each MODU with multiple GPS transponders that are installed and operational by July 01, 2009.
2. Equip each MODU with a GPS system that provides a robust and reliable means of monitoring the position and tracking the path in real-time if the MODU moves from its location during a severe storm.
3. Install and protect the tracking system's equipment to minimize the risk of the system being disabled by storm damage.
4. Place multiple GPS transponders in different locations for redundancy to minimize risk of system failure.
5. Make sure that each GPS transponder is capable of transmitting data for at least seven days after a storm has passed.

### **GPS Real-time Data Access**

Ensure that you allow the MMS GOMR real-time access to the MODU location data. By July 01, 2009, contact Lance Labiche by telephone at (504) 736-2433 or by e-mail at [lance.labiche@mms.gov](mailto:lance.labiche@mms.gov) with information on how you are granting this access. This information can be provided by you or your drilling contractor.

If your MODU moves off location during a storm event, immediately begin to record the GPS location data and contact the MMS GOMR COOP office with the following information:

- Lessee or operator name;
- Contact information;
- Rig/facility/platform name;
- Initial date and time; and
- How you provided GPS real-time data access.

### **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 regulatory requirements that provides a clear and consistent approach to complying with those requirements. 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 Statement**

The Paperwork Reduction Act (PRA) provides that 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. Until OMB has approved this information collection burden, you are not required to respond. We will update this NTL with the OMB control number as soon as we receive approval of the information collection request.

**Contact**

If you have any questions regarding this NTL, please contact Lance Labiche by telephone at (504) 736-2433 or by e-mail at [lance.labiche@mms.gov](mailto:lance.labiche@mms.gov).

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Regional Director