UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
GULF OF MEXICO OCS REGION

NTL No. 2012-G02 Effective Date: September 01, 2012

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 Hurricane Isaac

The Bureau of Safety and Environmental Enforcement (BSEE) 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 250.106(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 Storm Isaac before it struck land on August 29, 2012.

Affected Area

The affected area for purposes of this NTL is the area indicated in the NOAA graphic, Figure 1, as being exposed to hurricane force winds, the area in red. NOAA's loop wind swath graphic can be viewed at:
http://www.nhc.noaa.gov/archive/2012/graphics/al09/loop_S.shtml
If you have difficulty determining your location on the graphic, you may call either (504) 736-5793 or (504) 736-5794.

Fixed 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 Hurricane Isaac before manning (a platform that has personnel on board 24 hours a day or quartered overnight) a fixed OCS platform or structure.

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, the BSEE GOMR has determined that you must conduct the following surveys to all fixed OCS platforms and structures in the affected area of Hurricane Isaac:

1. A Level I survey before you man any platform located in the affected area. You may resume production following completion of the Level I survey. However, do not man the platform if the Level I survey indicates structural damage.
2. A Level II underwater survey if structural damage is indicated by the Level I survey.
3. A Level III underwater survey for:
    a. Any platform that experienced wave loading on the deck; and
    b. Any platform where Level II survey results indicate a Level III survey is necessary.
4. A Level IV survey if a Level III survey detects significant structural damage 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 affected area. Make sure that you complete all surveys by March 31, 2013. Complete all work to correct any damage you find during a platform survey before June 1, 2013.

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:

1. Develop a detailed, comprehensive around-the-clock weather monitoring plan;
2. Comply with U.S. Coast Guard regulations regarding ingress/egress to the boat landing; and
3. 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, 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 BSEE GOMR before you make major repairs of any damage.

By November 1, 2012, submit the information listed below by e-mail to structures@boemre.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 March 31, 2013.

The BSEE GOMR will review the inspection plans. You may submit amendments to your list and inspection plans for our consideration. Further, submit an amendment to your inspection plan whenever the results of a Level II survey require you to conduct a Level III survey.

Floating OCS Structures

The above inspection requirements also apply to floating facilities including semisubmersibles, spars and TLPs. The Level I survey should report any loss of station of the floaters. The structural components to be inspected should also include mooring lines or tendon components.

OCS Pipelines

Pursuant to 30 CFR 250.1005(a), you must conduct inspections of pipeline routes at intervals and using methods prescribed by BSEE. Under this authority, the BSEE GOMR hereby directs you to conduct the following inspections by March 31, 2013, for pipelines in the affected area.

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 BSEE GOMR of each of your OCS pipeline tie-ins and crossings in water depths less than 200 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.

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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 199 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.

5. Mudslide Area – For pipelines permitted in the mudslide area, conduct an underwater visual inspection of pipeline tie-ins and crossings in mudslide areas in accordance with item 1 above, regardless of water depth, and conduct a leak test in accordance with the provisions below.

Submit the inspection results and subsequent updates to pipelines@boemre.gov by the first Friday of each month until all requirements are met.

Complete all work to correct any damage you find during a pipeline inspection before June 1, 2013. Be reminded that before you conduct any repairs, you are to submit a repair procedure for review and acceptance to the BSEE GOMR Pipeline Section.

If you haven't already done so, perform a leak test before you return to service any pipeline located in the affected area.

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.

Testing Device Extensions and Returning to Production

Pursuant to 30 CFR 250.804, safety devices shall be successfully inspected and tested by the lessee at the interval specified in the regulations. Testing must be in accordance API RP 14C, Appendix D. As many operators discover damage to facilities and are unable to perform required BSEE inspections, operators are calling in and requesting departures to extend the inspection time frames or to waive the inspections until such time that an inspection of the devices can be performed safely. To curtail written request for departures with respect to safety device testing and inspections the below listed guidelines should be followed:

• If your structure is not safe to board you need to record, in the platform records, that the safety device testing has been suspended due to hurricane damage. Your weekly, monthly, or quarterly test can be suspended until you are ready to commence production. If you are unable to perform your test by October 15, 2012, contact the BSEE district office for a further possible extension.

• When any facility is considered "manned" all firefighting, flame, smoke or heat dectors as a well as gas detection and personnel safety equipment shall be maintained, inspected and operational.

• Prior to re-establishing production you shall verify integrity of the surface safety system and the emergency support system. Any repairs of these systems must be tested and documented prior to resuming production. On manned platforms at least one primary means of escape must be in place. If an unmanned platform is boarded and there are no primary means of escape, personnel must be provided with a secondary means of escape and a standby vessel shall be moored to the facility or a helicopter in attendance.

• Departures for performing United States Coast Guard (USCG) Annual Safety Inspections shall be granted by the appropriate USCG district office.

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 BSEE collects this information to carry out its responsibilities under the OCS Lands Act, as amended. The BSEE will use the information to determine if the structural integrity of platforms and pipelines may have been adversely affected by Hurricane Isaac, 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. The Office of Management and Budget (OMB) has approved the collection of information pertaining to OCS Pipelines and Pipeline Rights-of-Way at 30 CFR 250, subpart J, and assigned OMB Control Number 1010-0050; and for Platforms and Structures at 30 CFR 250, subpart I, and assigned OMB Control Number 1010-0149. We estimate the public reporting burden to average approximately 144 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.

Direct any comments regarding the burden estimate or any other aspect of this collection of information to the Information Collection Clearance Officer, Mail Stop 5438, Bureau of Safety and Environmental Enforcement, Department of the Interior, 1849 C Street, NW, Washington, D.C. 20240.

Contacts

Please address any questions regarding platform surveys or reports to Mr. Sid Falk of the BSEE GOMR Office of Structural and Technical Support by telephone at (504) 736-2459 or by e-mail at structures@boemre.gov. Address any questions regarding pipeline inspections or reports to Ms. Angie Gobert of the BSEE GOMR Pipeline Section by telephone at (504) 736-2876 or (504) 452-3562, or by e-mail at pipelines@boemre.gov. Address any questions regarding safety device inspection and testing to the appropriate district office.

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Lars T. Herbst
Regional Director

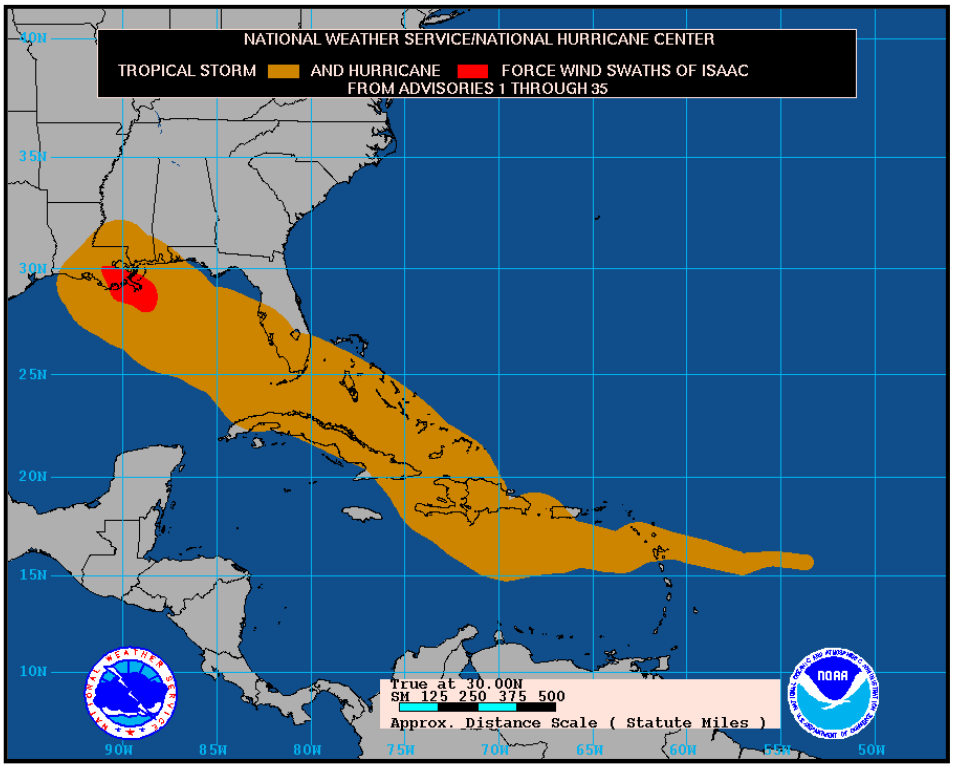

Figure 1. NOAA Graphic