

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

NTL No. 2008-G03

Effective Date: April 14, 2008
Expiration Date: March 31, 2013

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

Pollution Inspection Intervals for Unmanned Facilities

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2000-G11, dated May 12, 2000. It clarifies current policy by specifying that some of the pollution inspections for unmanned facilities are to be accomplished by physically boarding the facility.

According to 30 CFR 250.301(a), you must inspect production facilities daily or at intervals approved or prescribed by the District Manager to determine if pollution is occurring. Under this authority, the appropriate Gulf of Mexico OCS Region (GOMR) District Manager may use the following point system matrix and evaluation code to determine the pollution inspection interval for an individual unmanned facility:

Pollution Inspection Matrix

VALUE	10 Points	20 Points	30 Points	40 Points	50 Points
Distance of facility to nearby manned platforms	<1 mile	1-2 miles	3-5 miles	6-20 miles	>20 miles
Distance of facility to shoreline or sensitive area	>60 miles	31-60 miles	21-30 miles	10-20 miles	<10 miles
Capacity of hydrocarbon storage tanks on facility	<20 bbls	20-75 bbls	76-100 bbls	101-125 bbls	>125 bbls
General direction of currents	Away from shoreline	_____	Parallel to shoreline	_____	Towards shoreline
SCADA or other continuous monitoring	All operating conditions; SI capability	Pressures, levels, etc.; no SI capability	Pressures only	_____	Not monitoring anything
Product	Dry gas or <10 BCPD or <10 BOPD	Gas and <100 BCPD	Gas and >100 BCPD	Gas and <100 BOPD	>100 BOPD or >20ppm H ₂ S
Pollution incidents >1 bbl in the 2 years before request date	No pollution incidents	One or more pollution incidents is 200 points.			

Evaluation Code

Points	Inspection Interval	Physical Boarding Inspection Interval
70-100	Bi-weekly	Bi-weekly
110-150	Weekly	Weekly
160-200	Every three days	Weekly
210-250	Every other day	Weekly
260+	Daily	Weekly

Exceptions

1. The MMS GOMR will not approve an increase in the prescribed daily pollution inspection interval until production has been established on the facility for a period of 7 days for a minor platform and 30 days for a major platform. A *major* platform is a structure with either six or more completions or zero to five completions with more than one item of production process equipment. A *minor* platform is a structure with zero to five completions with one item of production process equipment.

2. When all of the wells on an unmanned facility (a) are disconnected from production facilities and blind flanged, (b) are equipped with a tubing plug, or (c) have their master valves locked closed, and you have drained the hydrocarbons from all of the tanks and vessels, the appropriate GOMR District Manager may approve a pollution inspection interval of up to one month. Perform this monthly inspection by physically boarding the facility.

3. The appropriate GOMR District Manager will not approve an increase in the prescribed daily pollution inspection interval if your facility is producing, processing, or storing more than 400 barrels of liquid hydrocarbons per day.

4. The appropriate GOMR District Manager may rescind an approval for an increase in the prescribed daily pollution inspection interval if a pollution incident involving a spill greater than one barrel subsequently occurs at the facility.

5. When you perform a “physical boarding” inspection, ensure that you inspect each deck of the facility with an emphasis on major components. Indicate the date of each “physical boarding” inspection in your records.

6. For “visual” inspections, fly-over inspections are acceptable provided the aircraft can determine the evidence of pollution on the surface of the water. Visual inspections utilizing binoculars from one platform to another are not acceptable.

7. An approval for an increase in the prescribed daily pollution inspection interval becomes void if the conditions under which it was granted change substantially.

Guidance Document Statement

The MMS GOMR 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 a regulatory requirement that provides a clear and consistent approach to complying with that requirement. However, if you wish to use an alternative approach for compliance, you may do so, after you receive approval from the appropriate MMS GOMR office under 30 CFR 250.141.

Paperwork Reduction Act of 1995 Statement

The information collection referred to in this NTL provides clarification, description, or interpretation of requirements contained in 30 CFR 250, Subpart C. The Office of Management and Budget (OMB) approved the information collection requirements for this regulation and assigned OMB Control Number 1010-0057. This NTL does not impose additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contacts

Please direct any questions you may have regarding this NTL to the Production Engineer in the appropriate GOMR District Office.

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Regional Director