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

NTL No. 2009-G17 Effective Date: August 4, 2009

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

Designated Safe Welding Areas on Rigs

This Notice to Lessees and Operators (NTL) supersedes NTL No. 99-G10, effective May 11, 1999, on this subject. It clarifies the process for establishing a designated safe welding area, includes a guidance document statement, and updates terminology and contact information.

Purpose

The purpose of this NTL is to inform you of the current policy of the Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) regarding designated safe welding areas on rigs. This policy streamlines procedures and reduces burdensome paperwork with regard to your submittal of requests for approval of designated safe welding areas on rigs.

Definition

As stated in 30 CFR 250.105, *welding* means all activities connected with welding, including hot tapping and burning.

Background

As required by 30 CFR 250.109(a), you must submit a Welding Plan to the appropriate MMS GOMR District Manager for approval. Under 30 CFR 250.110(c)(5), you must include in your Welding Plan the practices and procedures for safe welding that address plans showing all designated safe welding areas. The MMS GOMR recognizes that providing this information for a rig you may use in the future is usually not possible at the time you submit the Welding Plan. In those cases, you must supplement your Welding Plan with a request to the appropriate MMS GOMR District Manager to establish a designated safe welding area for a particular rig.

Procedures

In your request to establish a designated safe welding area for a particular rig, include a rig drawing that shows the proposed area. After receipt, authorized MMS GOMR representatives will conduct an onsite inspection. During the inspection, make sure you resolve any issues or

problems indicated by the MMS GOMR personnel. After completion of a satisfactory inspection, the appropriate MMS GOMR District Manager will approve the designated safe welding area by signing and dating the rig drawing and return it to you, along with any specified approval conditions. This approval will be accepted by all MMS GOMR District Offices and will remain valid as long as the designated safe welding area does not change.

Policy

- 1. Only one of the five MMS GOMR District Managers needs to approve your request for a designated safe welding and burning area for a particular rig.
- 2. If you use a rig for the first time and another lessee or operator has received approval from an MMS GOMR District Manager for a designated safe welding area for the rig, you may use the approved designated safe welding area. In this case, you do not need to request an additional approval.
- 3. In accordance with 30 CFR 250.109(b)(1), make sure that you have a copy of your approved Welding Plan and its approval letter available on the rig.
- 4. In accordance with 30 CFR 250.109(b)(2), post the approved rig drawing that shows the designated safe welding area with the MMS GOMR District Manager's signature, including any conditions of approval, on the rig in a conspicuous location.
 - 5. Clearly mark and identify the designated safe welding area.
- 6. Do not locate combustible material within 35 feet of the designated safe welding area. However, you can locate a diesel intake point or paint lockers within 35 feet of the area provided you do not perform hot-work operations while
- a. diesel loading or off-loading operations are underway. Post a sign at the diesel intake point that indicates that welding will be shut down in the designated area during diesel loading or off-loading operations; and
- b. the paint locker door is open and/or during paint mixing operations. Post a sign on all sides visible that indicates that hot-work operations will be shut down in the designated area while the paint locker door is open and/or during paint mixing operations.
- 7. You can locate mud room hatches within the 35-foot buffer zone. However, make sure that the hatch is closed while welding operations are being performed.
- 8. If, during an inspection, an authorized MMS GOMR representative revokes the use of a designated safe welding and burning area on a rig due to changes in the approved layout, the representative will remove the drawing outlining the designated safe welding area with the District Manager's signature from the rig. You may request that the area be re-established as a designated safe welding and burning area. However, the appropriate MMS GOMR District Manager will not approve this request until an authorized representative has inspected the area.

9. Be advised that you are not required to use an approved designated safe welding area on a rig. If you do not wish to recognize the approved designated safe welding area on a rig, you must perform welding operations according to your approved Welding Plan.

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 a regulatory requirement that provides a clear and consistent approach to complying with that requirement. However, if you wish to use an alternate 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 information collection referred to in this NTL provides clarification, description, or interpretation of requirements contained in 30 CFR 250, subpart A. The Office of Management and Budget (OMB) has approved the information collection requirements for this regulation and assigned OMB Control Number 1010-0114. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contact

Please address any questions you may have regarding this NTL to the appropriate MMS GOMR District Drilling Engineer or Workover/Completion Engineer.

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Lars T. Herbst Regional Director