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

NTL No. 2009-G32

Effective Date: November 4, 2009 Expiration Date: November 3, 2014

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

# **In-Service Inspection Intervals for Fixed Platforms**

This Notice to Lessees and Operators (NTL) supersedes NTL No. 99-G12, effective June 7, 1999, on this topic. It updates policy on platform inspection intervals, includes guidance on conducting platform corrosion assessments, updates regulatory and document references, revises contact information, and includes a guidance document statement.

### Authority

The Minerals Management Service (MMS) regulation at 30 CFR 250.901(a)(7) requires that your plans for platform inspection must, as appropriate, comply with the Recommended Practice for Planning, Designing, and Constructing Fixed Offshore Platforms - Working Stress Design, Twenty-first Edition, December 2000 (API RP 2A-WSD). Section 14 of API RP 2A-WSD describes the comprehensive in-service inspection program (including survey levels and frequencies) you should have in place to monitor periodically the adequacy of the corrosion protection system and determine the condition of the platform.

Table 14.4.2-1 of API RP 2A-WSD (Guideline Survey Intervals) specifies the time interval between platform inspections depending upon exposure category (L-1, L-2, or L-3) and survey level (Level I, Level II, Level III, or Level IV). The purpose of this NTL is to establish policy and provide guidance on those inspection intervals.

### **Inspection Interval Policy**

1. As specified in Table 14.4.2-1 of API RP 2A-WSD, conduct a Level I survey for each platform at least annually, not to exceed 12 months. As specified in Section 14.3.1 of API RP 2A-WSD, each Level I survey includes a corrosion assessment of the platform. Based on this assessment, assign a grade to the coating system using the following definitions:

A - Good condition, no maintenance needed within three years

B – Fair condition, maintenance needed within three years

C – Poor condition, maintenance needed within twelve months

2. Conduct a Level II survey for each platform at the minimum survey interval specified in Table 14.4.2-1 for each exposure category (i.e., at least every three years for L-1 platforms and at least every five years for L-2 and L-3 platforms).

3. Conduct a Level III survey for each platform at the minimum survey interval specified in Table 14.4.2-1 for each specified exposure category (i.e., at least every six years for L-1 platforms and at least every eleven years for L-2 platforms).

For unmanned platforms, the MMS Gulf of Mexico OCS Region (GOMR) may approve an increased interval up to the maximum survey interval specified in Table 14.4.2-1 for Level II inspections (i.e., at least every five years for L-1 platforms and at least every ten years for L-2 and L-3 platforms) and for Level III inspections (i.e., at least every six years for L-1 platforms and at least every eleven years for L-2 platforms) when you can demonstrate that

1. You are in compliance with all structural inspection requirements for all of your platforms in the Gulf of Mexico OCS.

2. You have performed at least one Level II or Level III survey (as applicable) on the platform.

3. The platform is in good structural condition according to the results of both the Level I and Level II surveys on record with the MMS GOMR.

To apply for an increased Level II or Level III inspection interval, submit a request to the MMS GOMR during the year the inspection is required. Submit your request in sufficient time for the MMS GOMR to process the request before the reporting year ends (see 30 CFR 250.919(a)). In your request,

1. Include a complete description of the platform, including lease number, OCS area and block, name, and MMS complex identification number.

2. Specify the proposed interval, explain the reason you wish to have the increased inspection interval, and provide supporting information.

3. Include a summary of the findings of the most recent Level I and Level II surveys (including cathodic potential readings).

#### **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 MMS GOMR Office of Structural and Technical Support under 30 CFR 250.141(a).

### **Paperwork Reduction Act of 1995 Statement**

The information referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR Part 250, Subpart I. The Office of Management and Budget (OMB) has approved the information collection requirements in this regulation under OMB control number 1010-0149. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995.

#### Contact

Please address questions regarding this NTL to the MMS GOMR Office of Structural and Technical Support by telephone at (504) 736-2634.

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