

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

NTL No. 2008-G14

Effective Date: September 8, 2008

**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 Gustav

The Minerals Management Service (MMS) 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 250.103 and 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 Gustav before it struck land on September 1, 2008.

Fixed OCS Platforms and Structures

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 Gustav before manning 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 MMS GOMR has determined that you must conduct the following surveys to fixed OCS platforms and structures along the path of Hurricane Gustav:

**Survey
Level**

Platform Category

I Before manning all platforms located east of Line 1 and west of Line 2 drawn between the following three points:

Line 1 –

North Point (Latitude - 29 ° 28' 37.662" N; Longitude - 91 ° 50' 03.040" W)

Deflection Point (Latitude - 28 ° 49' 23.150" N; Longitude - 91 ° 10' 59.394" W)

South Point (Latitude - 26 ° 58' 08.844" N; Longitude - 88 ° 31' 36.337" W)

Line 2 –

North Point (Latitude - 29 ° 42' 13.318" N; Longitude - 89 ° 37' 24.419" W)

Deflection Point (Latitude - 29 ° 09' 25.470" N; Longitude - 88 ° 44' 44.042" W)

South Point (Latitude - 26 ° 58' 35.440" N; Longitude - 86 ° 30' 15.242" W)

You may resume production if this Level I survey indicates no structural damage.

II Level II underwater surveys must be performed if structural damage is indicated in the Level I Survey by December 1, 2008.

III Level III underwater surveys are required to resume production for:

1. All platforms that experienced wave loading on the deck.
2. All platforms where Level II survey results indicate a Level III survey is necessary.

IV Must be performed by December 31, 2008, to resume production if detection of significant structural damage is exhibited during a Level III survey 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 described area. Make sure that you complete all surveys by December 1, 2008. Complete all work to correct any damage you find during a platform survey before December 31, 2008.

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:

- a. Develop a detailed, comprehensive around-the-clock weather monitoring plan;
- b. Comply with U.S. Coast Guard regulations regarding ingress/egress to the boat landing; and
- c. 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, do not man the platform until you 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 MMS GOMR before you make major repairs of any damage.

By October 1, 2008, submit the information listed below by e-mail to structures@mms.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, 2009.

The MMS 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 dislocation 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 MMS. Under this authority, the MMS GOMR hereby directs you to conduct the following inspections by March 31, 2009, for pipelines located east of Line 1 and west of Line 2 drawn between the following three points:

Line 1 –

North Point (Latitude - 29 ° 28' 37.662" N; Longitude - 91 ° 50' 03.040" W)

Deflection Point (Latitude - 28 ° 49' 23.150" N; Longitude - 91 ° 10' 59.394" W)

South Point (Latitude - 26 ° 58' 08.844" N; Longitude - 88 ° 31' 36.337" W)

Line 2 –

North Point (Latitude - 29 ° 42' 13.318" N; Longitude - 89 ° 37' 24.419" W)

Deflection Point (Latitude - 29 ° 09' 25.470" N; Longitude - 88 ° 44' 44.042" W)

South Point (Latitude - 26 ° 58' 35.440" N; Longitude - 86 ° 30' 15.242" W)

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 MMS 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.

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 – 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@mms.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, 2009. Be reminded that before you conduct any repairs, you are to submit a repair procedure for review and acceptance to the MMS GOMR Pipeline Section.

If you haven't already done so, perform a leak test before you return to service any pipeline located east of Line 1 and west of Line 2 drawn between the following three points:

Line 1 –

North Point (Latitude - 29 ° 28' 37.662" N; Longitude - 91 ° 50' 03.040" W)

Deflection Point (Latitude - 28 ° 49' 23.150" N; Longitude - 91 ° 10' 59.394"W)

South Point (Latitude - 26 ° 58' 08.844" N; Longitude - 88 ° 31' 36.337" W)

Line 2 –

North Point (Latitude - 29 ° 42' 13.318" N; Longitude - 89 ° 37' 24.419" W)

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South Point (Latitude - 26 ° 58' 35.440" N; Longitude - 86 ° 30' 15.242" W)

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 MMS inspections, operators are calling in and requesting waivers 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 waivers 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, 2008, contact the MMS district office for a further possible extension.
- When any facility is considered "manned" all firefighting, flame, smoke or heat detectors as a well as gas detection and personnel safety equipment shall be maintained and inspected as required.

- Prior to re-establishing production all surface safety devices (weekly, monthly, quarterly test) shall be inspected and tested and all containment systems shall be operational. 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 MMS collects this information to carry out its responsibilities under the OCS Lands Act, as amended. The MMS will use the information to determine if the structural integrity of platforms and pipelines may have been adversely affected by Hurricane Gustav, 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; for Platforms and Structures at 30 CFR 250, subpart I, and assigned OMB Control Number 1010-0149; and NTL, Damage Caused by Hurricane Gustav, and assigned OMB Control Number 1010-0164. 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, Minerals Management Service, Department of the Interior, 1849 C Street, NW, Washington, D.C. 20240.

Contacts

Please address any questions regarding platform surveys or reports to Mr. B.J. Kruse of the MMS GOMR Office of Technical and Structural Support by telephone at (504) 736-2634 or by e-mail at structures@mms.gov. Address any questions regarding pipeline inspections or reports to Mr. Alex Alvarado of the MMS GOMR Pipeline Section by telephone at (504) 736-2547 or (504) 452-3562, or by e-mail at pipelines@mms.gov. Address any questions regarding safety device inspection and testing to the appropriate district office.

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Lars Herbst
Regional Director