

**UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT  
PACIFIC OUTER CONTINENTAL SHELF REGION**

NTL No. 2019-P02

Effective Date: October 1, 2019

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

**Electronically Stored Records**

**Purpose**

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2008-P01. Pursuant to 30 CFR 250.103, the Bureau of Safety and Environmental Enforcement (BSEE) Pacific Outer Continental Shelf Region (POCSR) is issuing this NTL to clarify and provide more detail concerning BSEE requirements for lessee and operator maintenance of electronically stored records and documents and for making such information available for BSEE inspection.

**Background**

BSEE regulations require you to maintain various records related to operations, testing, training, and inspections. These requirements enable BSEE to inspect such records during its annual inspection of each facility on the outer Continental Shelf (OCS) or as otherwise needed. The record maintenance regulations include, but are not limited to, the following:

- 30 CFR 250.108(e) - What requirements must I follow for cranes and other material-handling equipment?
- 30 CFR 250.301 - Inspection of facilities.
- 30 CFR 250.851(b), 250.852(a)(3), 250.858(b), 250.864, and 250.865(b) - Additional Oil and Gas Production System Requirements.
- 30 CFR 250.890 - Records.
- 30 CFR 250.1163(c) and (d) - How must I measure gas flaring or venting volumes and liquid hydrocarbon burning volumes, and what records must I maintain?
- 30 CFR 250.1203(f)(4) and (5) - Gas measurement.
- 30 CFR 250.1205(b)(3) and (4) - Site security.
- 30 CFR 250.1630(b) - Safety-system testing and records.

**Guidance**

If you use a compliance management system and store your test records and other documentation in an Internet-accessible central database or electronic filing system, BSEE POCSR will recognize this as your official records storage location following submission and approval of a sufficient alternative procedure request pursuant to 30 CFR 250.141.

If you use an Internet-accessible central database or electronic filing system, it should:

- Provide your personnel offshore a means to present the required records to authorized BSEE personnel, as needed, in a reasonable amount of time before the conclusion of an onsite inspection. BSEE recognizes that performance of electronic systems is dependent on connections and server performance. However, BSEE considers it reasonable for you to present requested records by the end of the inspection.
- Include provisions for backing up data and records at a secure offsite location.
- Include controls to ensure data integrity and security, including tracking and storing information about those persons who enter and modify data and when such changes are made. You should be able to demonstrate to BSEE the adequacy of the controls you have in place.
- Provide the means to generate summary reports containing the information BSEE's requires you to maintain and submit.

## **Procedure**

If you would like BSEE POCSR to use your electronic compliance management system for records inspection, submit a letter to the appropriate BSEE POCSR office requesting approval of an alternate procedure under 30 CFR 250.141. With the request, provide a list of your facilities (in a spreadsheet format) that use an electronic compliance management system. In the list, include each such facility's: BSEE complex identification number; OCS area and block number; facility name; compliance management system name; and a contact name, telephone number, and email address for BSEE POCSR to use to request access to the electronically-stored records. Please email your request for alternative compliance and accompanying spreadsheet to POCSR Office of Field Operations and/or Office of Production and Development.

In the event that BSEE approves your request for alternative compliance, BSEE POCSR personnel will contact you at least two weeks prior to your scheduled facility inspection to request URL's, user account names, and passwords to access your electronic records for a specific period of time prior to the onsite inspection. After reviewing the records, BSEE POCSR may contact you and provide a list of any forms or records that were unavailable, unclear, or problematic. In this case, BSEE POCSR will expect you to provide the records, collections, or clarifications during the onsite inspection.

BSEE understands that many of the electronic compliance management systems in place today may serve multiple purposes and may contain data that is beyond the scope of the data required by BSEE. Therefore, you may limit BSEE access to only the pertinent data subject to inspection as required by the regulations. Although BSEE does not expect you to include a minimum set of records in your electronic system, we do expect to find the records generated since the last BSEE inspection. Any required records not available to BSEE via the electronic compliance management system must be available at the onsite location or at another location conveniently available to the Regional Supervisor.

### **Guidance Document Statement**

BSEE issues NTLs as guidance documents in accordance with 30 CFR 250.103 to clarify, supplement, and provide more detail about certain BSEE 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 BSEE office under 30 CFR 250.141.

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

The Office of Management and Budget (OMB) has approved the information collection requirements associated with 30 CFR 250 Subparts A, C, H, K, L, and P; as well as assigned OMB Control Numbers 1014-0022, 1014-0023, 1014-0003, 1014-0019, 1014-0002, and 1014-0006. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.).

### **Contacts**

If you have any questions regarding this NTL, please contact:

POCSR Office of Field Operations (805) 384-6370 bseepacaliforniadistrict@bsee.gov	POCSR Office of Production and Development (805) 384-6300 bseepacopd@bsee.gov
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Pacific OCS Region  
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Regional Director