

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

NTL No. 2001-G05

Effective Date: June 20, 2001

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

Fire Prevention and Control Systems

The Minerals Management Service (MMS) regulation at 30 CFR 250.803(b)(8)(i) requires that you equip each OCS platform with a firewater system that provides needed protection in all areas where production-handling equipment is located. However, under 30 CFR 250.803(b)(8)(iii), you may use a fire prevention and control system that uses chemicals only in lieu of a firewater system if the appropriate Gulf of Mexico OCS Region (GOMR) District Supervisor determines that the use of a chemical system provides equivalent fire protection and control for personnel egress.

Departure Requests

To obtain a departure to use a chemical-only fire prevention and control system on an OCS platform, in lieu of a system that includes firewater, submit the following information to the appropriate GOMR District Supervisor for approval:

1. Your corporate philosophy concerning fire prevention, fire control, and fire fighting on OCS platforms.
2. A risk assessment demonstrating that a chemical-only system would not increase the risk to human safety. Provide the following and any other important information in your risk assessment:
 - a. Platform Description that includes:
 - (1) The type and quantity of hydrocarbons (i.e., natural gas, oil) that are produced, handled, stored, or processed at the facility.
 - (2) The capacity of any tanks on the facility that you use to store either liquid hydrocarbons or other flammable liquids.
 - (3) Whether the facility is manned or unmanned. If manned, the maximum number of personnel on board and the anticipated length of their stay. A manned facility is one that is attended 24 hours a day or where personnel are quartered overnight.
 - (4) The proximity of the platform to other OCS platforms.
 - (5) A diagram that depicts:
 - (a) Quarters location,
 - (b) Production equipment location,

- (c) Fire prevention and control equipment location,
 - (d) Lifesaving appliances and equipment location, and
 - (e) Evacuation plan escape routes from quarters and all manned working spaces to primary evacuation equipment.
- b. Hazard Assessment (Facility Specific) that:
- (1) Identifies the likely failures of installed equipment that could lead to a fire.
 - (2) Identifies the likely maintenance or repair activities that could lead to a fire.
 - (3) Identifies possible ignition sources on the facility.
 - (4) Identifies the likely fire scenarios that could occur.
 - (5) Estimates the fire/radiant heat exposure that personnel could be subjected to.
 - (6) Identifies other possible activities or factors that could lead to a fire.
- c. Human Factors Assessment (Not Facility Specific) that:
- (1) Describes the fire-related training your employees and contractors have received.
 - (2) Describes the training your employees and contractors have received in fire prevention, control of ignition sources, and control of fuel sources when the facility is occupied.
 - (3) Describes the instructions and procedures you have given to your employees and contractors on the actions they should take if a fire occurs.
- d. Evacuation Assessment (Facility Specific) that:
- (1) Describes the type and quantity of lifesaving appliances available on the facility.
 - (2) Describes the availability of support vessels, or the time needed for support vessels to arrive at the facility.
 - (3) Estimates the worst case time needed for personnel to evacuate the facility should a fire occur.
- e. Alternative Protection Assessment that:
- (1) Discusses the reasons you are proposing to use an alternative fire prevention and control system.
 - (2) Describes the proposed alternative fire prevention and control system/equipment.
 - (3) Lists the standards used to design, manufacture, and operate the system/equipment.
 - (4) Describes the testing, inspection, and maintenance program you will use to maintain the fire prevention and control equipment in an operable condition.
- f. Conclusion of Risk Assessment that provides a technical evaluation showing that the alternative system provides an equivalent level of personnel protection for the specific hazards located on the facility.

Caveats

1. The GOMR District Supervisor will base his approval of your departure request to use a chemical-only fire prevention and control system, in lieu of a system that includes a firewater system, on your risk assessment. If you make an insignificant change to your platform subsequent to departure approval, document the change and maintain the documentation at the facility for MMS review and/or inspection. Do not submit this documentation to the GOMR District Supervisor. If you make a significant change to your platform (e.g., placement of a

storage vessel with a capacity of 100 barrels or more on the facility), submit a new departure request, including an updated risk assessment, to the appropriate GOMR District Supervisor for approval.

2. The GOMR District Supervisors are not likely to approve departure requests to use chemical-only fire prevention and control systems on large or complex manned platforms with densely clustered equipment.

Previous Departure Approvals

For manned platforms that have an existing departure to use a chemical-only fire prevention and control system in lieu of a firewater system, the GOMR recommends that you review these facilities to determine whether the chemical-only system provides the equivalent protection of a firewater system for the egress of personnel should a fire occur.

Inoperable Firewater Systems

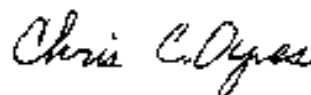
If you are required to maintain a firewater system and it becomes inoperable, you are authorized to use a chemical-only fire-suppressant system on a temporary basis (for a period up to 72 hours) while you make the necessary repairs. If you are unable to complete repairs during this initial 72-hour time period because of exigent circumstances, the appropriate GOMR District Supervisor may grant you a departure for up to an additional 72 hours.

Paperwork Reduction Act of 1995 Statement

The information collection referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR 250, Subparts A and H. The Office of Management and Budget (OMB) has approved the information collection requirements in these regulations under OMB control numbers 1010-0114 for Subpart A and 1010-0059 for Subpart H. 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 respective GOMR District Office.



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