OMB Approval Number: 1010-0050
OMB Expiration Date: January 31, 2006

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

NTL No. 2004-G18

Effective Date: October 4, 2004
Expiration Date: June 30, 2005

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 Ivan

The Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) is issuing this Notice to 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 Ivan when it struck land on September 16, 2004.

OCS Platforms and Structures

Pursuant to 30 CFR 250.912(a), you must periodically inspect OCS platforms and structures (platforms) in accordance with the provisions of American Petroleum Institute Recommended Practice 2A-WSD, Twenty-First Edition (API RP 2A-WSD), Section 14, Surveys.

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 Ivan.

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.

In light of these requirements and the numerous reports of severe damage to platforms (both above and below the water line) along the path of Hurricane Ivan, the MMS GOMR has determined that you must conduct the following surveys:

Survey Level	Platform Category
I	All platforms exposed to winds speeds greater than 74 mph.
II	All platforms located within 35 miles of Hurricane Ivan's eye center storm track (see Attachment A of the NTL for a map of the described area).
III	All platforms that experienced wave loading on the deck and where Level II survey results prescribe Level III surveys.

Begin immediately to conduct the required surveys of the affected platforms. We encourage you to inspect first the older platforms located nearest the eye center storm track, and then gradually inspect those platforms toward the outer limits of the described area. Complete all inspections/surveys by May 1, 2005. Complete all work to correct any damage you find during a platform inspection before June 1, 2005.

Make every attempt to complete the required underwater inspections before you man any of the affected platforms. If it is operationally impractical for you to wait to complete the inspections before you man an affected 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 a 24-hour stand-by boat with full radio communications between the 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(e) requires you to obtain approval from the MMS GOMR before you make major repairs of any damage.

The MMS is currently working to obtain emergency approval from the Office of Management and Budget (OMB) to collect reports from you on inspections on the structures that are located in the area affected by Hurricane Ivan. After this approval is obtained, the MMS GOMR will likely issue an NTL that will require you to submit the following information:

a. A list of platforms affected by the hurricane;
b. An initial inspection plan for each platform;
c. A timetable that shows you will complete each inspection by May 1; and
d. Inspection reports.

These information collection requirements are very similar to those required by MMS GOMR after Hurricane Lili damaged OCS structures in the Gulf of Mexico (NTL No. 2003-G04).

OCS Pipelines

Pursuant to 30 CFR 250.1005(a), you must conduct inspections of pipeline routes at intervals and using methods prescribed by the MMS. Under this authority, and because of the numerous reports of severe damage to OCS pipelines along the path of Hurricane Ivan, the MMS GOMR hereby directs you to conduct the following inspections by May 1, 2005:

1. Pipeline Tie-in Inspections - Conduct an underwater visual inspection using divers or ROV, a scanning sonar processor, or a 500-kHz sidescan sonar in combination with a

magnetometer to inspect each of your OCS pipeline tie-ins located within the corridor between 89º 30' W longitude and 87º 30' W longitude (see Attachment B of this NTL for a map of the described area). 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.

2. Pipeline Riser Inspections - Conduct a visual inspection of the above-water portion of each pipeline riser located within the corridor between 89º 30' W longitude and 87º 30' W longitude (see Attachment B of this NTL for a map of the described area). 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 described in Item No. 4 below (if you are not already required to do so) 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 located within the corridor between 89º 30' W longitude and 87º 30' W longitude (see Attachment B of this NTL for a map of the described area). Inspect the riser, vortex-induced vibration (VIV) suppression devices, and the connection point (flexible element, titanium stress joint, etc.) to the structure for damage.

4. Underwater Riser and Pipeline Inspections - Conduct a visual inspection using divers or ROV, a scanning sonar processor, or a 500-kHz sidescan sonar in combination with a magnetometer to inspect the underwater portions of each of your OCS pipeline risers and adjacent pipelines located in water depths between 200 feet and 500 feet within the corridor between 89º 30' W longitude and 87º 30' W longitude (see Attachment B of this NTL for a map of the described area). If applicable, conduct this riser and pipeline inspection in conjunction with the required platform Level II surveys described above. Inspect the riser and riser clamps for damage. Inspect the pipeline for evidence of displacement or exposure from the base of the riser along the entire length of the pipeline.

5. Remedial Action - If an inspection indicates (a) factors that could detrimentally affect the performance or integrity of pipeline valves and fittings at a tie-in, (b) conditions that could cause interference with navigation or other uses of the OCS, (c) riser or riser clamp damage, or (d) that a pipeline has been displaced, exposed, or damaged, submit a plan of corrective action, pursuant to the requirements of 30 CFR 250.1008(g), by mail to the GOMR Pipeline Section (MS 5232) or by e-mail to elizabeth.komiskey@mms.gov for approval within 30 days after completing the inspection. Within 30 days after you complete the work, submit a written report indicating that the repairs were performed as proposed, confirming the type and/or cause of damage, and including the results of any pressure tests by mail to the GOMR Pipeline Section (MS 5232) or by e-mail to elizabeth.komiskey@mms.gov. Complete all work requiring corrective action before June 1, 2005.

6. Additional inspections. If you suspect that Hurricane Ivan may have damaged a pipeline or related structure that is located outside the corridor between 89º 30' W longitude and 87º 30' W longitude (see Attachment B of this NTL for a map of the described area), conduct the appropriate inspections described in Items Nos. 1, 2, and 4 above and, as appropriate, submit a plan of corrective action as described in Item No. 5 above.

If you haven't already done so, perform a leak test before you return to service any pipeline located within the corridor between 89º 30' W longitude and 87º 30' W longitude (see Attachment B of this NTL for a map of the described area). Make sure that the leak test successfully tests the integrity of the pipeline. A successful leak test means no unobservable leakage during the test period. 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.

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 Ivan, 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. An agency may not conduct or sponsor, and a person is not required to respond to, a collection. There is no new reporting burden in this NTL. Reporting requirements in this NTL are per current regulations at 30 CFR 250 1008(g). The OMB has approved the collection of information and assigned OMB control number 1010-0050. Direct any comments regarding the burden estimate or any other aspect of this collection of information to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, Department of the Interior, 1849 C Street, N.W., Washington, D.C. 20240.

Contacts

Please address any questions regarding platform inspections or reports to Mr. Tommy Laurendine of the GOMR Office of Technical and Structural Support by telephone at (504) 736-5709 or by e-mail at tommy.laurendine@mms.gov and questions regarding pipeline inspections or reports to Ms. Elizabeth Komiskey of the GOMR Pipeline Section by telephone at (504) 736-2418 or by e-mail at elizabeth.komiskey@mms.gov.

Chris C. Oynes
Regional Director

Attachments