



Phase One

Weather Watch and Evaluation (72 to 96 Hours before Projected Impact)

- Surveillance of Current Tropical Activity
 - Forecast Time Lines
 - Projected Tracks
 - Impact to Customer Operations
 - Advanced Solicitation of Customer Transportation Requirements
 - Strategic Allocation of Assets



Phase Two

Preparation for Evacuation

(48 to 72 Hours before Projected Impact)

- Surveillance of the Tropical Activity
 - Updated Forecast Time Lines and Projected Tracks
 - Implementing Customer Plans for Non-Essential Personnel
 - Setting Customer Time Lines
 - Varies by Geographic Location and Infrastructure
 - Plans for Air Logistics Asset Evacuation
 - Examining Options for Direction of Deployment



Phase Three

Evacuation

(36 to 48 Hours before Projected Impact)

- Updated Forecast Time Lines and Projected Tracks
 - Customer Evacuation
 - Implementing Customer Plans
 - Setting the Air Logistics Time Line
 - Decision made as to the Direction of Deployment
 - Implementing the Plan for Asset Evacuation



Re-Deployment

(6 to 12 Hours After Actual Landfall)

- Challenges to resuming customer operations
 - Impact to shore bases and infrastructure
 - Impact to customer locations and infrastructure offshore
 - Fuel stations
 - Expanding the Flight Following Network Area of Coverage
 - Impact to "OUR" Employees



After Action Review

(The Good the Bad and the Ugly)

- Evaluation of the Plan
 - Convening the "STAFF"
 - Successes and Failures
 - Planning and Implementation
 - How well did we meet the customers expectations?
 - How well did we meet "OUR" employee expectations?



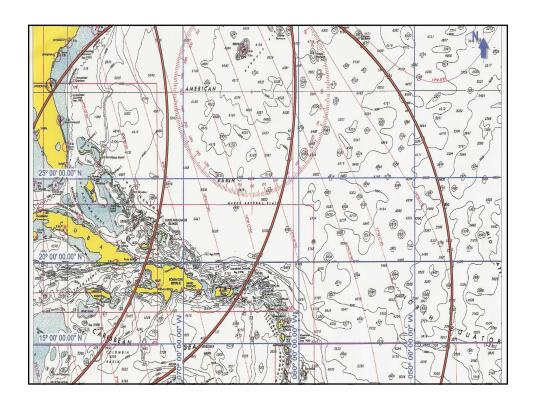




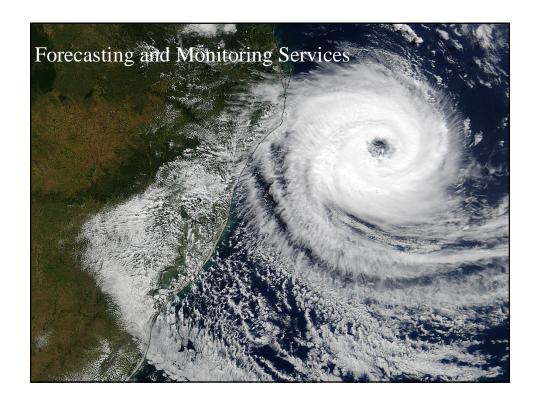


PRE	SENT OPERATION	
NO	TE: ENTER N/A FOR NON-APPLICABLE PROCEDURES.	
	OPERATION CONFIGURATION	TIME REQ
1	M/W Warm Up Hydraulics for Stinger	
2	Insert Lay Down Head in Station	
3	Perform NDE on joint in Station 3	
4	Weld on Lay Down head (ST1, ST2, ST3)	
5	Connect A&R Cable to Lay Down Head	
6	Transfer Tension To A&R winch	
7	Commence Laying Down of Pipe-Line	
8	Abandon pipe with A & R Cable (with or without ROV)	
9	Reposition anchors or bring in anchors of wet store anchors	
10	Jack in Stinger	
	Option Taken - Bring in Anchors or Wet Storage Anchors Barge Under Tow	
11	Bring in 2 Anchors	
12	Hook up Tow Bridle to Tug	
13	Wet Storage remaining anchors in field (pick up later if possible)	
	Grand Total	

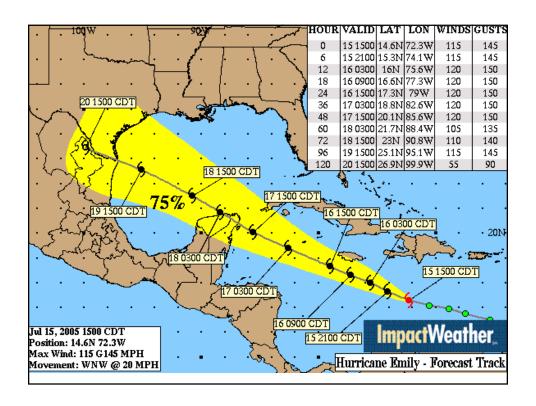
SECURE AND EVACUATION TIME FORM				
DATE: TIME: MORNING WEATHER REPORT CONDITION: HOURS:	LOCATION:			
TIME DESCRIPTION A. SECURE FROM PRESENT OPERATION: B. RECOVER ALL ANCHORS: C. TOW FOR A SAFE HARBOR, SET-UP/SECURE OR D. TOW FOR DESIGNATED ANCHORAGE, AND SET-UP/SECURE OR E. TOW AWAY TO FAIR WEATHER: TOTAL TIME:				
CONDITION III - STORM WATCH RADIUS (A) + (B) + (C OR D OR E) X (STORM SPEED) = STORM WATCH RADIUS (
CONDITION V – STORM EVACUATION RADIUS (C OR D OR E) X (STORM SPEED) = STORM EVACUATION RADIUS (







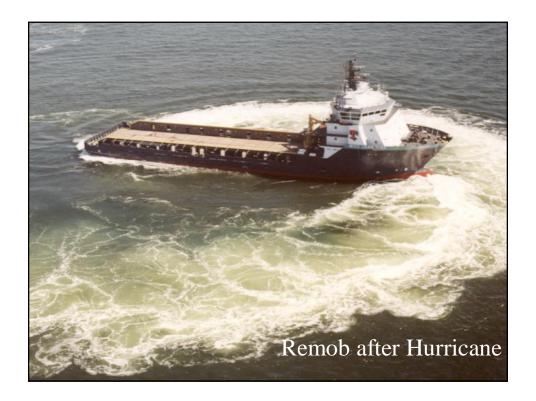












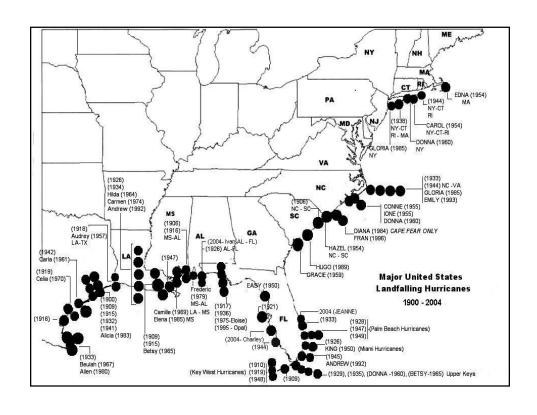
T. T. "Tommy" Laurendine, P.E. Chief, OSTS
Field Operations, GOM Region
tommy.laurendine@mms.gov
(504) 736 - 5709
Fax (504) 736 - 1747

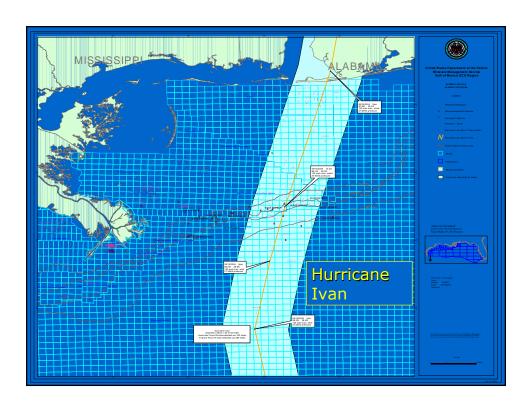


2005 Hurricane Preparedness

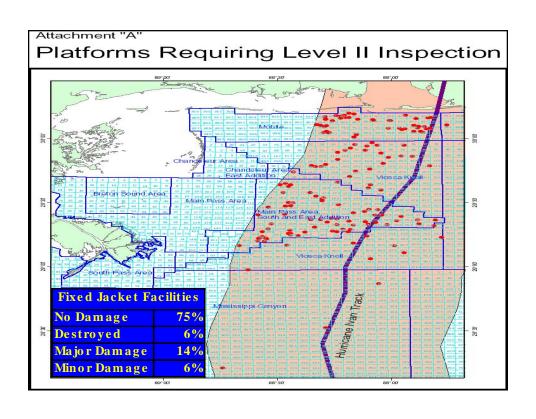
- Hurricane Cindy
 - Tripod under construction toppled
 - State Platform Oil Spill
- Hurricane Dennis
 - SEMI under construction listed



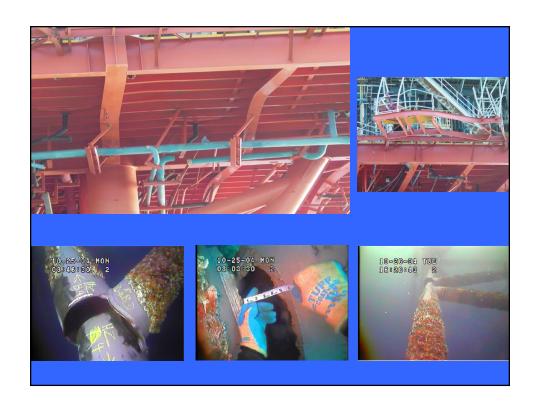




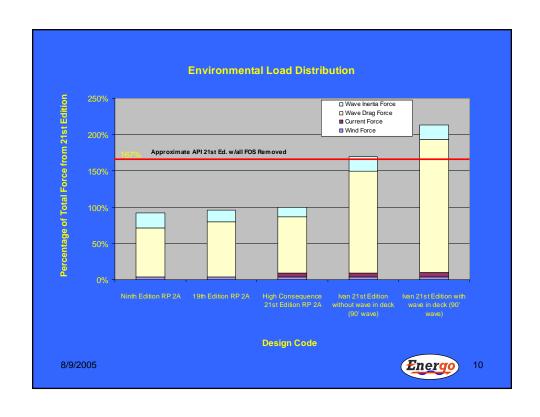




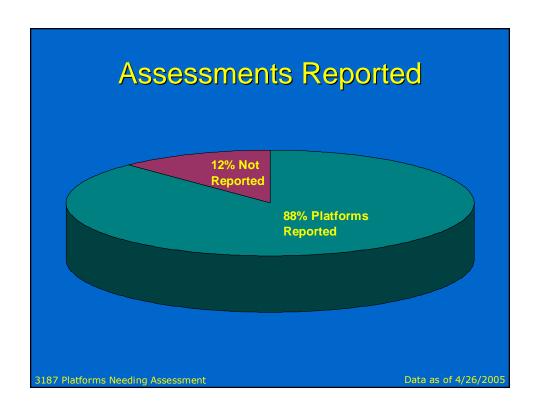


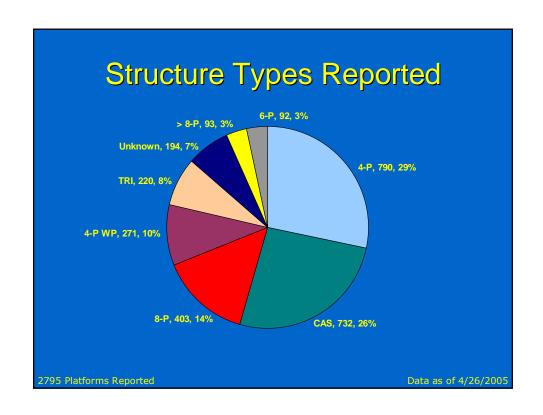


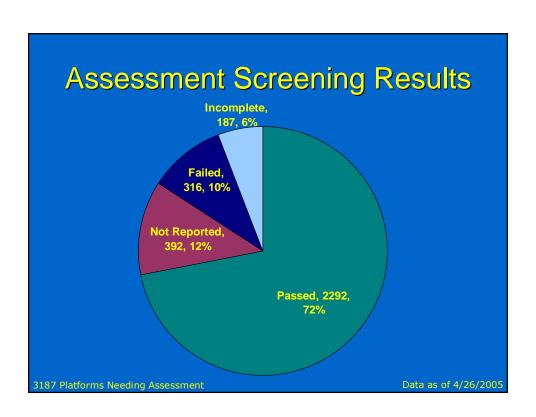


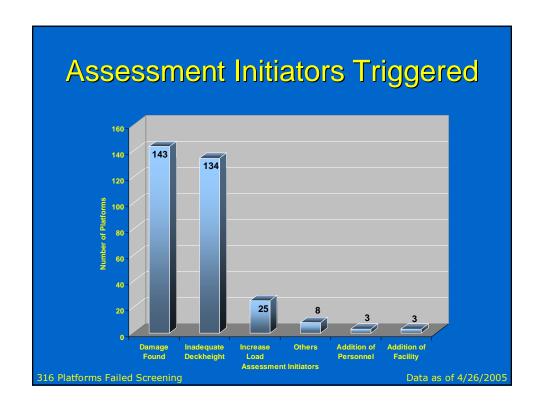


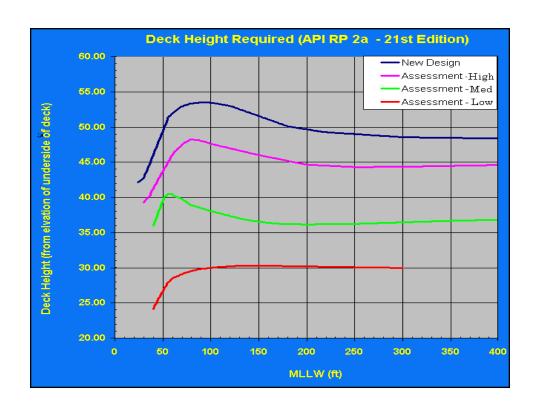


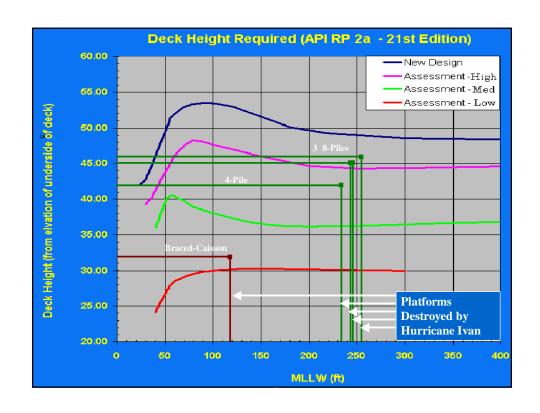


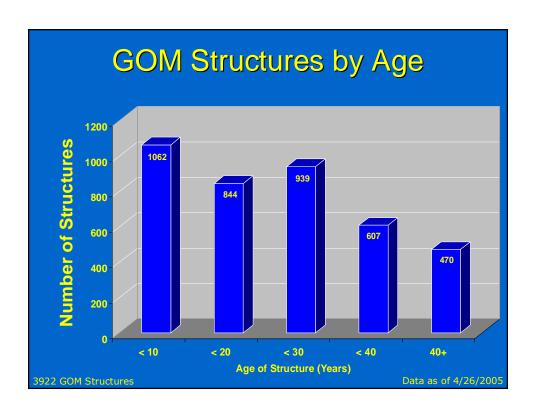


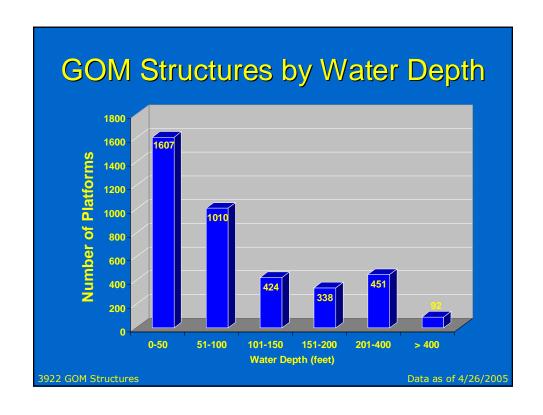


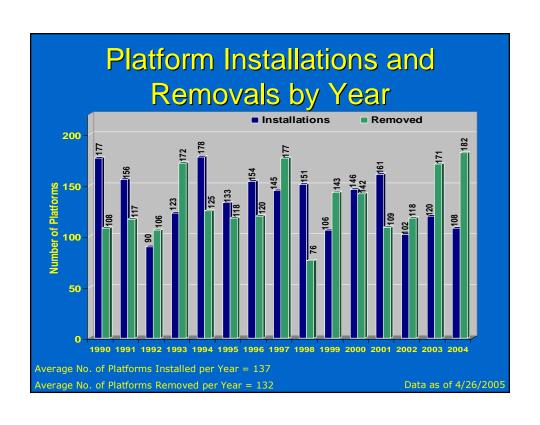


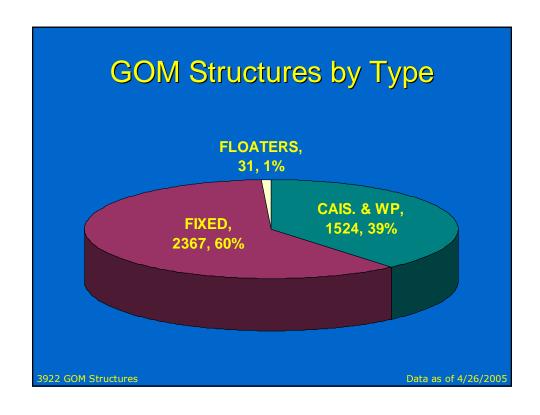


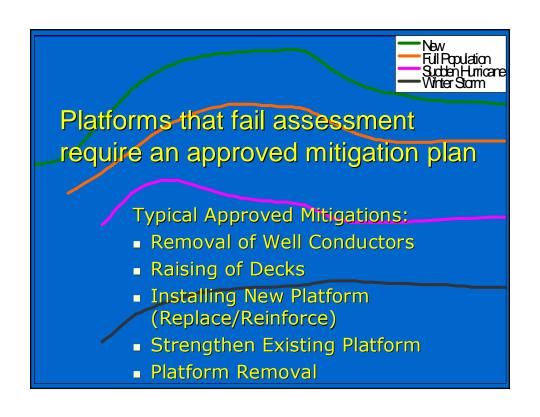


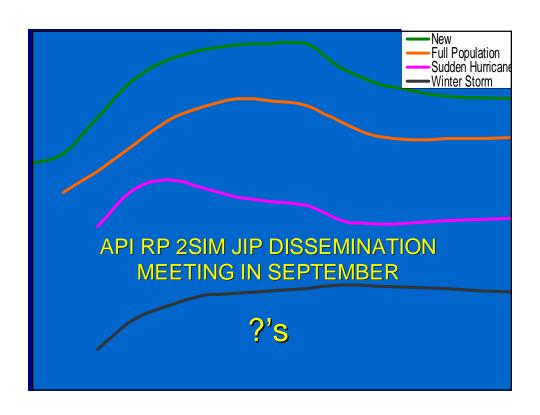
















Hurricane Ivan Topside Damage

Coache

- Major Process Reconstruction
 - South Pass 62 A/B/C/D Platforms
 - Main Pass 290 A/B Platforms
 - Main Pass 296 B/C/D Platforms
 - Main Pass 311 A/B Platforms
- Moderate Process Reconstruction
 - Main Pass 275 A
 - Main Pass 310 A



Hurricane Ivan Pipeline Damage / Repair

Coache

- Main Pass 275 A Pipeline Displaced / New Pipeline Installed
- Main Pass 151 A Oil & Gas Pipeline Displaced / Abandoning Field
- Mississippi Canyon 148 A Parted 3" Riser / Repaired
- Main Pass 290 A Parted 6" Riser / Repaired



Hurricane Ivan Structural Damage



- Main Pass 290 A
 - Jacket damaged by falling wreckage.
 - Hyperbaric Weld Repair Required (-218')
- South Pass 62 A/B/C
 - Local Buckles in Thin Wall Jacket Leg Section
 - Sec. 17 Reassessment Model Indicates No Repair Necessary
- MP 289 B / MP 296 B / MP 311 B Redundant Member Removals
- Main Pass 289 B Damaged Well Conductors (Plugging Wells)
- Main Pass 296 A Failed Conductor Bay (Removing Structure)

Hurricane Ivan Repair Cost Estimates Estimated Offshore Construction Man-Hours 700,000 Estimated Final Gross Cost \$94,000,000

Ivan – It Could Have Been Worse......



- No Apache Personnel Were Directly Injured by the Storm.
- Ivan Moved Through a Lower Producing Area for Apache.
- Resources Were Available for Quick Response.
- Apache Suffered Minimal Pipeline Damage.
- Our Structural Fleet Survived the Storm Reasonably Well.



Some Implications

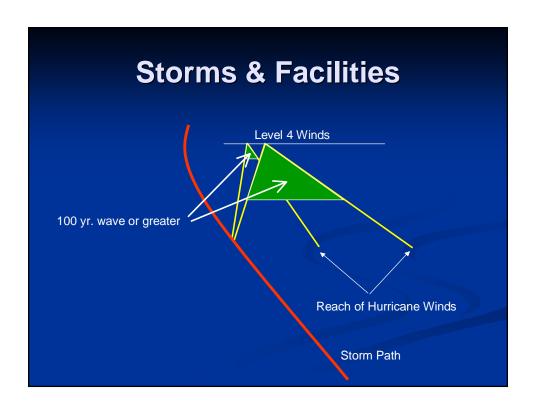
- Fixed Platforms
- Observations for Floaters
- Issues?

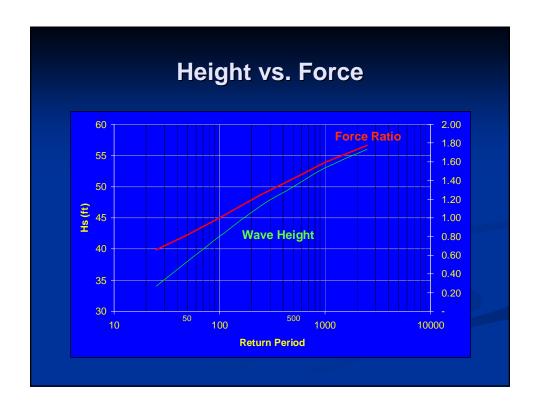
Design

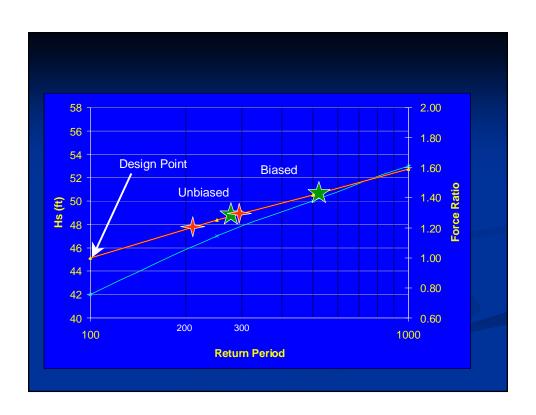
- Provide a series of loads and conditions that will result in a structure that will adequately perform – support loads – during the lifetime use of the facility.
- Often establish envelopes of combinations knowing that none will exactly match actual conditions

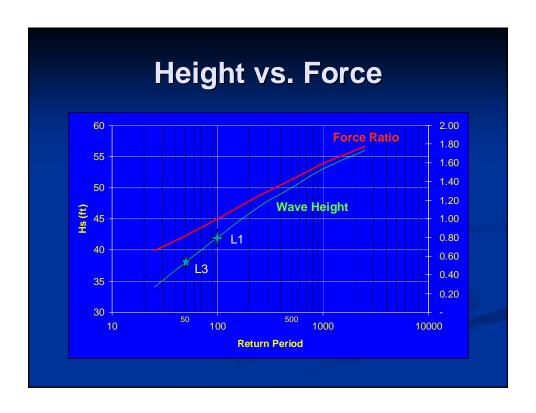
Underlying Assumptions

- Performance for individual structures
- Spatiality inherent with % of fleet impacted
- Patterned after land code strategies
- Generally more stringent than land codes– industry choice based on risk
- Levels introduced cost/risk driven









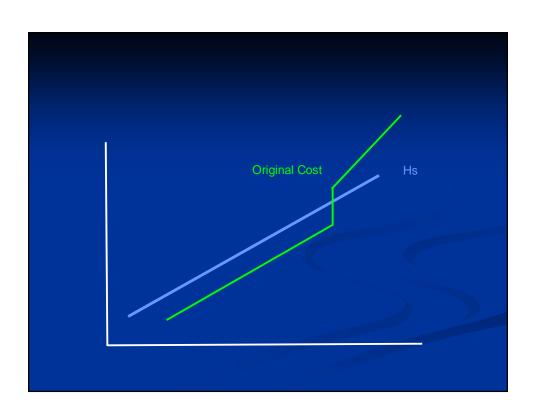
Implications

- Lower level allows lower force
- Generally direct relationship between level and production
- Life safety and environment are drivers
- Economics, once life and environment addressed, drive selection

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Role of Code Safe, fit-for-performance facilities, meeting safety objectives while economically viable



Issue

- There will always be a load greater than the design point/capacity of a structure
- Where is the correct balance of design point to risk?
- Structural?
- Non-Structural?

Shell's Experience with Hurricane Ivan

G. E. Sgouros

W.M. Pritchett

D.R. Schafer

D.L. Jones

Shell Exploration and Production Co.

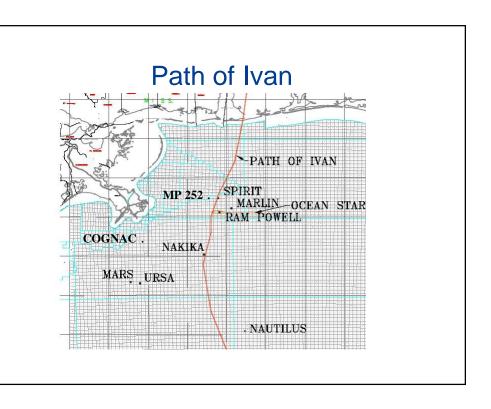
API – 2005 Hurricane Readiness and Recovery Conference

Objectives

- Describe Hurricane Incident Command Team
- Describe Response Post Landfall
- Describe Damage and Repairs on Shell Assets

Hurricane Incident Command Team

- ➤ Team members include:
- ➤ Team is multi-disciplined.
 - Drilling Logistics
 - Production Regulatory Affairs
 - Construction Engineering
- > Equipment and Resources secured.
- > Evacuation and recovery plans updated and changed as hurricane approaches.
- ➤On September 13, 2004, 850 people evacuated safely.



Response Post Landfall

- ➤ Damage Assessment
- ❖Non Severe Storm → Use helicopter operations
- ❖Severe Storm → Use Fixed Wing Planes
- Fixed wing plane was used Post Ivan.
- Fixed wing plane mission to determine suitability for helicopter operations.
- ➤ Damage assessments performed as soon as heliports were okay.

Cognac Description

➤ Mississippi Canyon 194 A (Cognac) is a drilling and production platform in 1025 ft of water, installed in 1978.



Damage Assessments – MC 194

- ➤ Evidence of Green Water in the deck, 45 feet above the water line; platform 100 miles from the eye of the storm.
- ➤ Platform damage consisted of:
 - Missing Grating and Handrails
 - Minor Facilities equipment
 - ❖Gaugers Shack

Damage Assessments – MC 194



Main Pass 252 Description

➤ The Main Pass 252 complex consists of 2 bridge connected platforms in 300 feet of water. The 252 complex primarily supports 7 subsea wells.



Damage Assessments – MP 252

- ➤ Evidence of Green Water in the deck, 50 feet above the water line. Platform was near the eye of the storm.
- ➤ Estimated wave height 65 70 ft which corresponds to the maximum design wave of 72 feet.
- ➤ Platform damaged consisted of:
 - Missing Grating and Handrails (100 % at boatlanding to 20 % on lower deck)
 - Facilities equipment, cable tray and mostly support utilities

Damage Assessments – MP 252



Viosca Knoll 956 A Description

➤ Viosca Knoll 956 A (Ram Powell) is a TLP in 3214 feet of water.



Damage Assessments – VK 956

- ➤ Evidence of Green Water in the deck, 90 feet above the water line. Platform near the eye of the storm.
- ➤ Estimated wave height at this location is around 100 ft. Design wave was around 87 ft.
- ➤ Platform damaged consisted of:
 - Drilling rig moved off location
 - ❖FGC 2 exhaust
 - Missing Grating and Handrails (100 % at boatlanding to 20 % on lower deck)
 - ❖Facilities equipment, cable tray and mostly support utilities



Damage Assessments – VK 956



Damage Assessments – VK 956



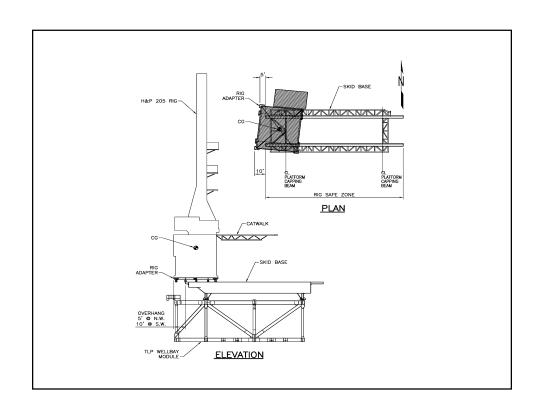


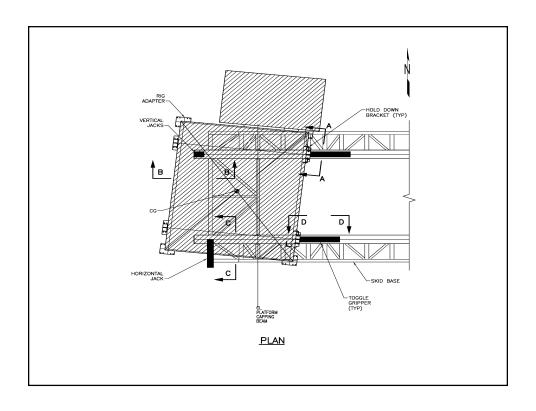
VK 956 A – Drilling Rig Recovery

- Challenges

horizontal force.

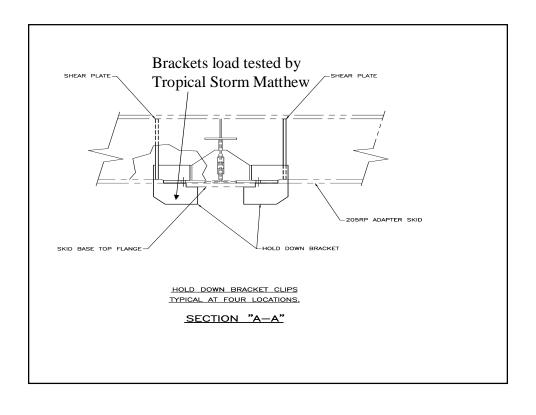
- ➤ Rig was located in potentially unstable position.
- ➤ Rig had to be secured to prevent further damage.
- ➤ 2500 ton rig to be a) lifted vertically then slid back into position or b) disassembled and then reassembled.
- ➤ Option a) was selected





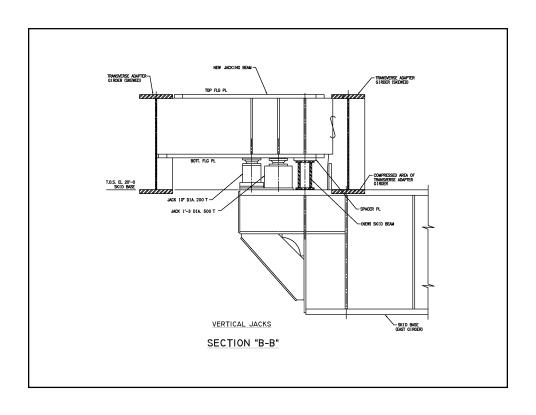
VK 956 A – Drilling Rig Recovery

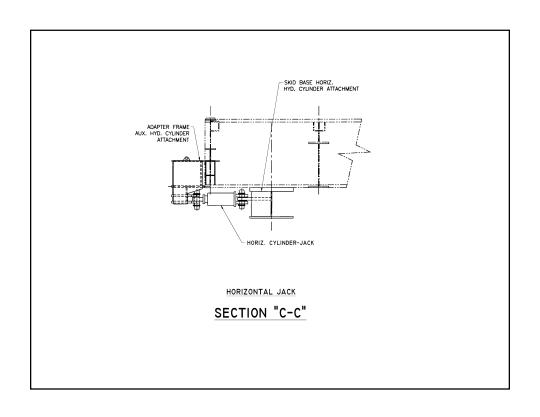
- -Strategy
 - ➤ Secure rig using hold down brackets.
 - ➤ Hold down brackets designed for additional hurricane force conditions.
 - ➤ Use a system of strategically placed jacks, cylinders and grippers to recover rig.

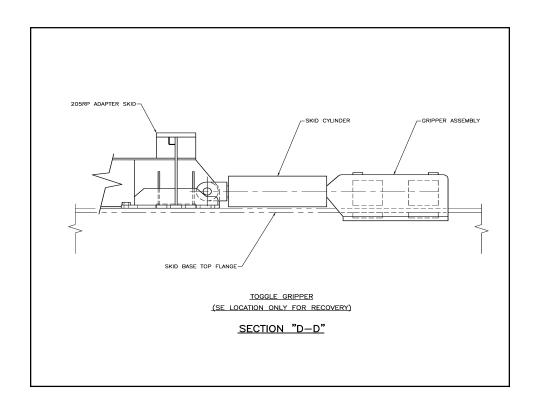


VK 956 A – Drilling Rig Recovery

- Vertical Recovery:
 - >Weld reaction and jacking beams in place.
 - ➤ Use 500 ton and 200 ton vertical jacks in combination to lift rig vertically. Actual force to lift the rig 3 inches was 1300 kips.
 - > Apply lubricant to skidding surfaces.
- Horizontal Recovery:
 - ➤ Use hydraulic horizontal cylinder and horizontal gripper to "square" rig on support beams and pull back to proper operating location. Actual force required was around 500 kips.





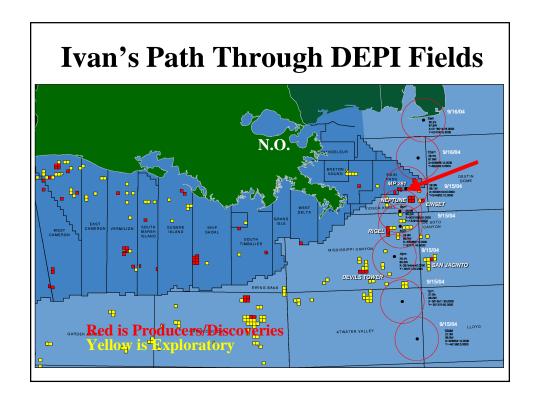


Conclusions / Learnings

- > Rig tie-down criteria exceeded.
- > Wave design criteria probably exceeded.
- > Shell participating in industry-wide efforts to address findings.
- ➤ An equipment replacement strategy is an enabler.
- ➤ Consider temporary offshore housing vs. day tripping.
- ➤ Coordinated approach allowed synergy.
- ➤ Repairs executed without major safety or environmental incidents.

Ivan the Terrible Dominion E & P, Inc.





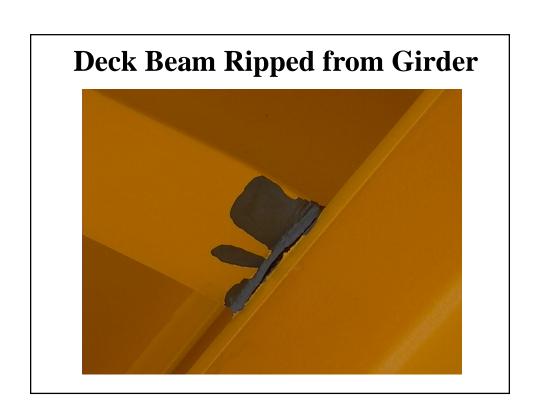
Platform Description

4 pile, 9 slot, drilling and production platform 307 feet of water
Installed 1997 (API RP 2A, 19th edition)
Three decks (average size = 85' x 135')
66" diameter piles
Cellar deck TOS at 52'-10"
Manned
Facility capacity: 20,000 bopd, 180 mmcfd
Can support a 1500 HP platform drilling rig

Dominion - Main Pass 281 "A"







Sump Tank Supports



Jacket Diagonal

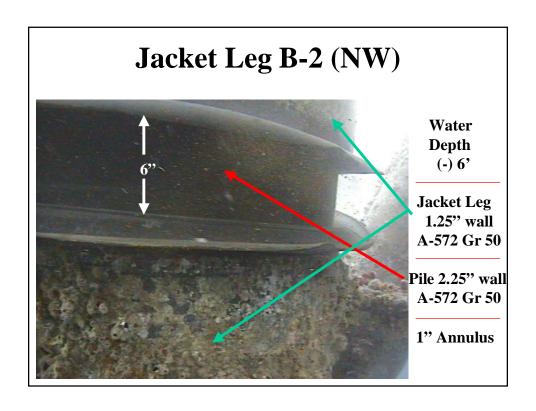


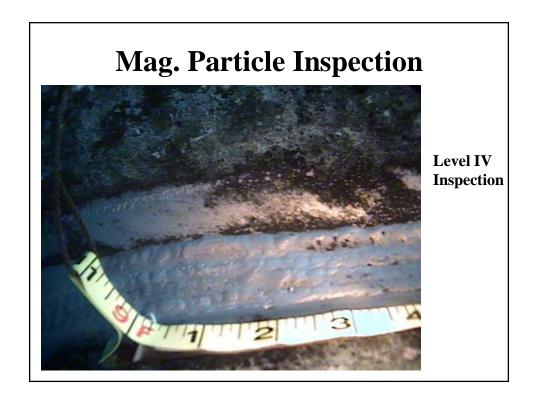
26 x 0.500" A-572 Gr 50

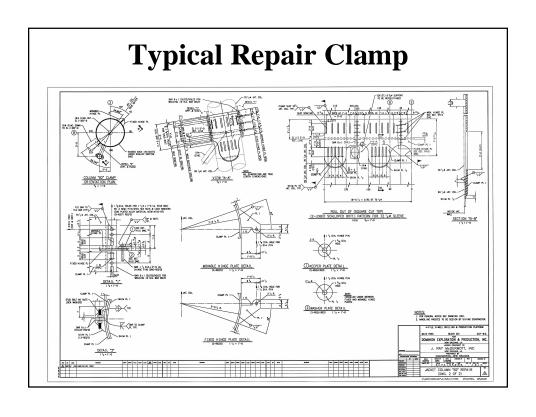
Jacket Diagonal



26 x 0.500" A-572 Gr 50









ROV



Fugro Consultants LP Pasadena, Texas



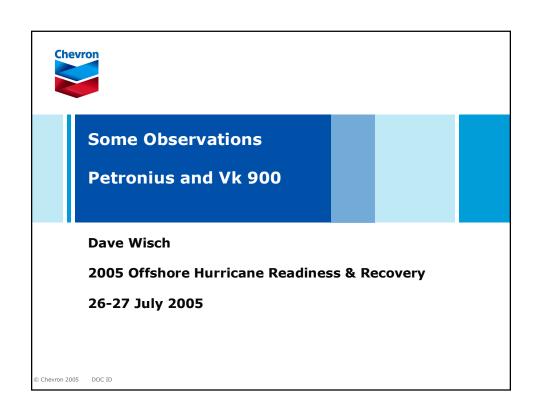


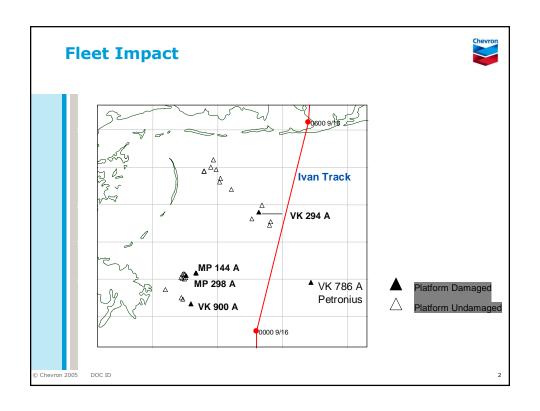
Hole Cut in Leg for ROV



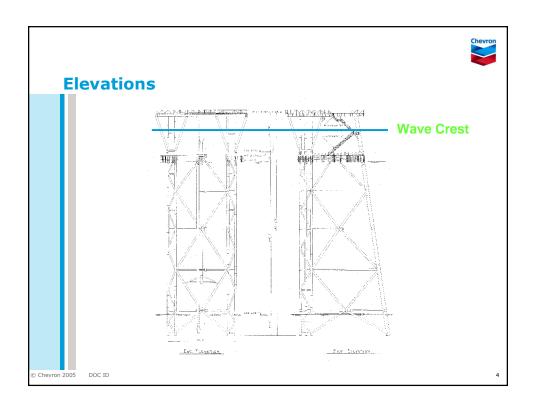
66" x 2.25" leg can 12" x 12" hole cut out stabbing guide













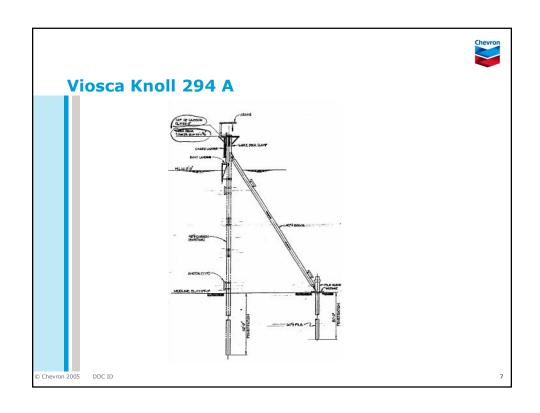
Activities Since Ivan

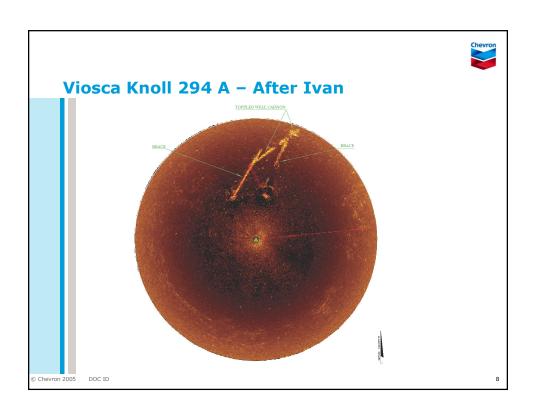


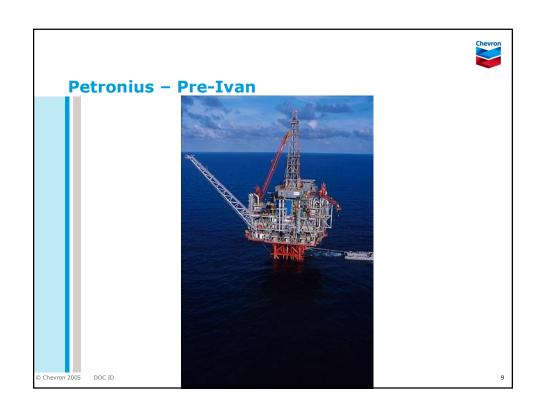
- Inspection
- Damage Assessment
- Repair Design
- Ambient Vibration Baseline
- Multiple Grouted Clamp Repairs
- Ambient Vibration Delta
- Fully Operational
- Working Question How valuable is vibration in determination of damage?

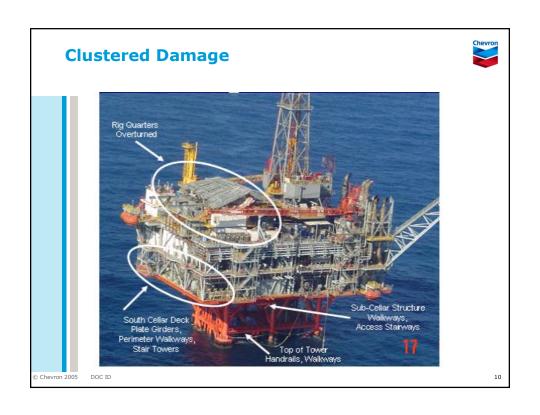
Chevron 2005

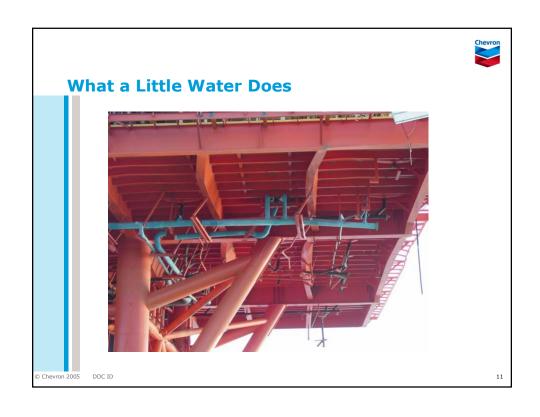
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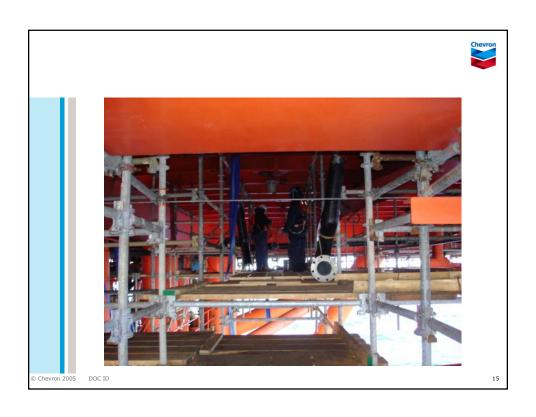


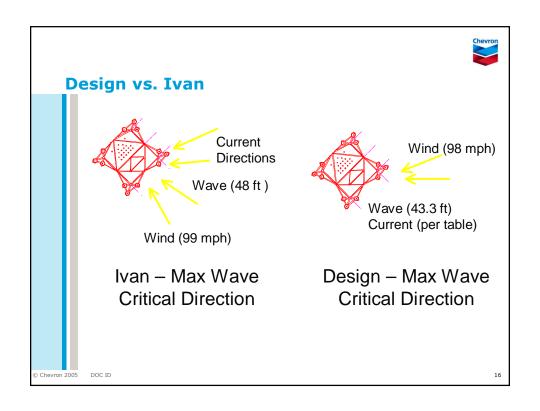


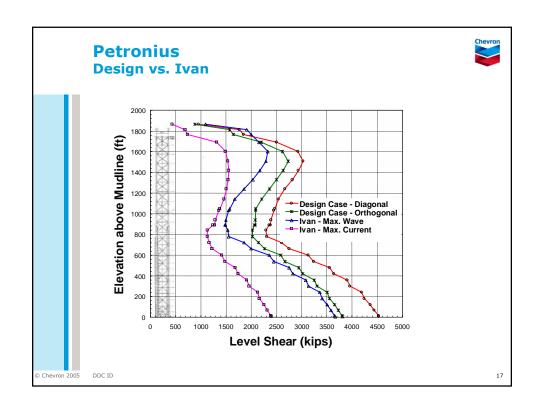


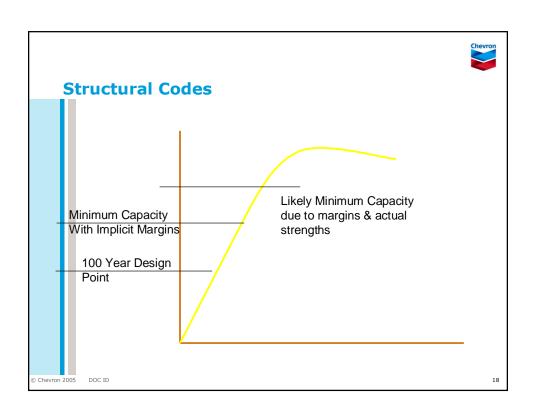


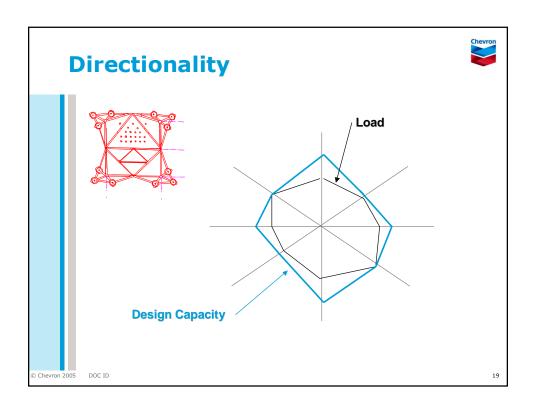


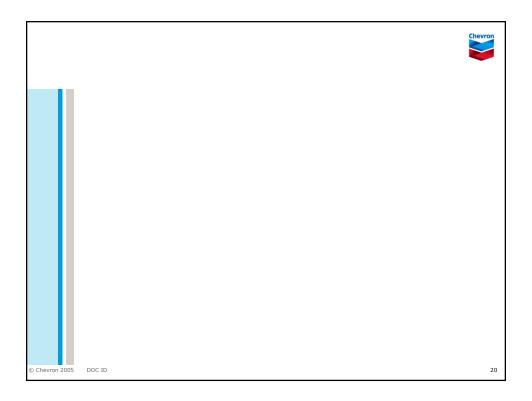














Virgo Platform (Viosca Knoll 823) Hurricane Ivan Impact & Recovery

7/27/2005

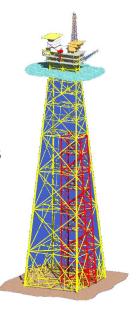
Richard Case

TOTAL E&PUSA, INC.

Virgo - Viosca Knoll 823

- Installed 1999
- 3 deck levels @ 100' x 200' each
- 1130 'w.d.
- 4 Main Pile Structure
- 6 Pile Upper Jacket
- 13 Wells Originally (including the 3 dual completions)
- 9 Wells Currently Producing
- Production Sept. 2004 (Pre-Ivan)
 - ~ 24 mmcfd
 - ~ 600 bcpd

TOTAL E&PUSA, INC.





Virgo – Viosca Knoll 823 OPERATIONS

- Wells & Wellheads / Structure / Jacket / Decks owned by Virgo Operating Partners (Total, El Paso, Nippon, and Pogo)
- Total is the Operator of the wells for Virgo Operating Partners
- Topsides Process System / Facilities owned by Dauphin Island Gathering Pipeline Partners (DIGP)
- Duke Energy is Ops. representative for DIGP
- Total is the on-site Operator of the topsides process system for Duke Energy



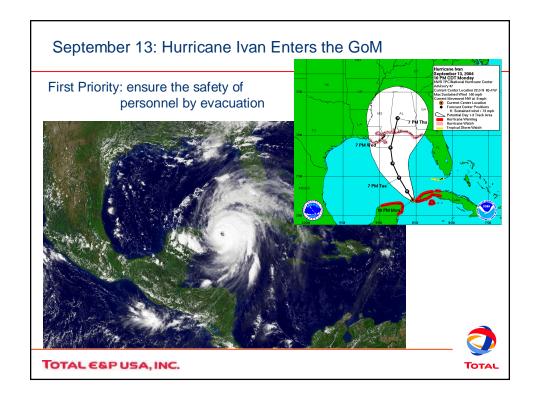
TOTAL E&PUSA, INC.

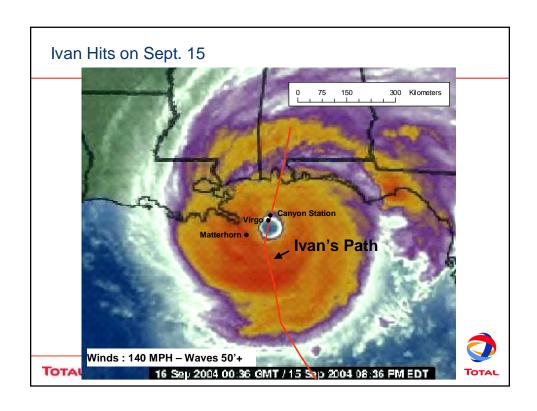
Virgo (VK823) - Pre-Hurricane Ivan



TOTAL E&P USA, INC.









Post Ivan Integrity Inspection

- Assess structurally soundness with a helicopter fly around.
- Board and perform initial 3rd Party visual checks with the operations team (Sept. 16, '04)
- Topside Inspection Utilized a rope access team to visually inspect all structural components (General visual, close visual and ACFM)
- Analyzed a damaged topside beam to assess its residual strength
- Performed overall structural analysis of the facility, using sea conditions that existed during Ivan, in order to assess the overall loading on the facility and to identify connections subject to the highest loads.
- Performed underwater ROV inspection covering structural integrity, selected weld integrity, anode condition, debris, scour risers.
- Performed flooded member inspection on most members.



TOTAL E&PUSA, INC.

Power / Control Cables & Trays



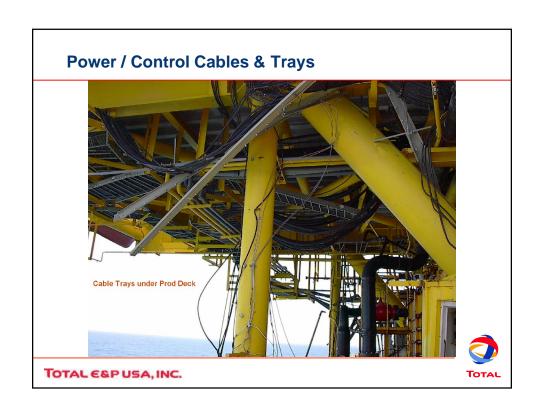














Cables / Handrails / Sewage Treatment / Generator











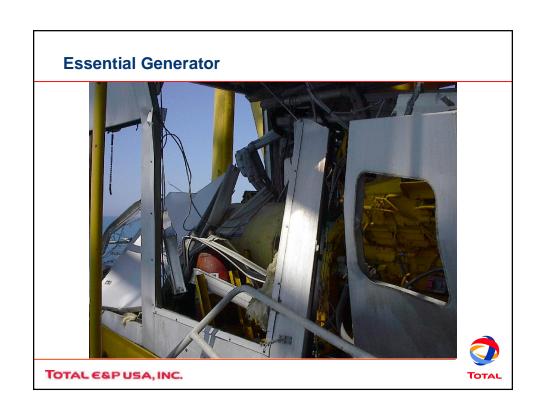








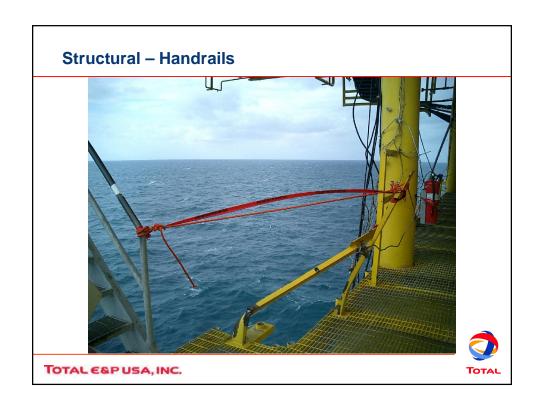




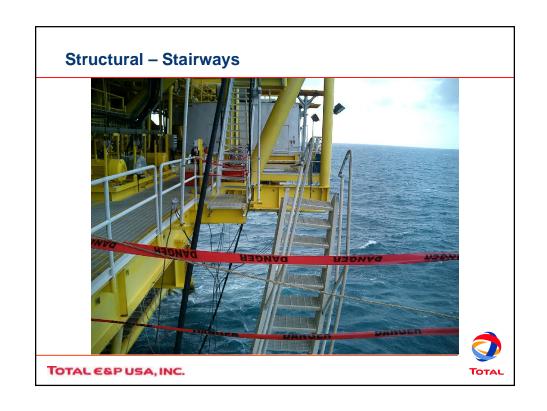


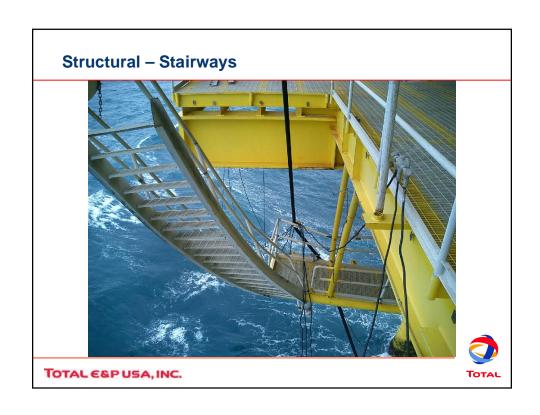










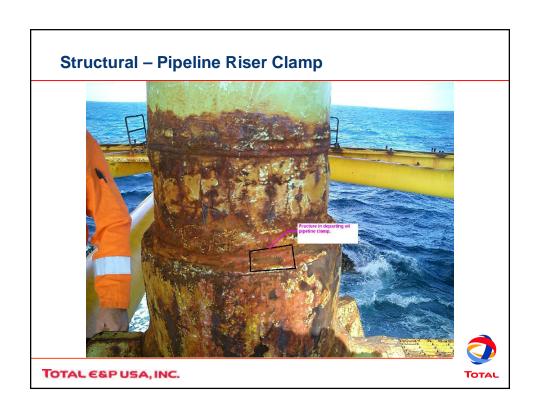


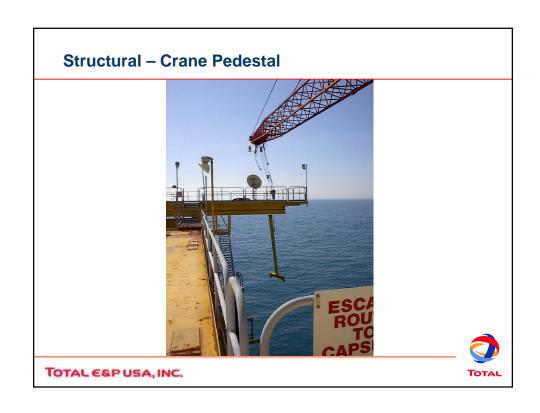


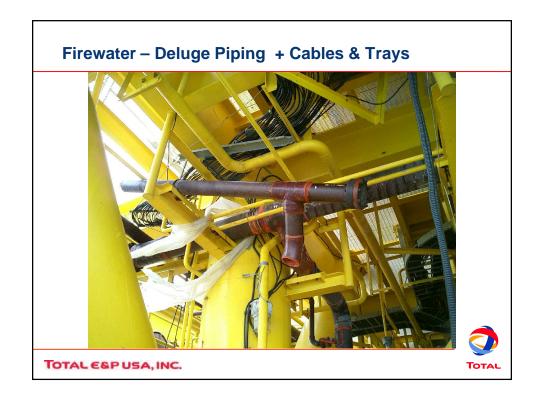


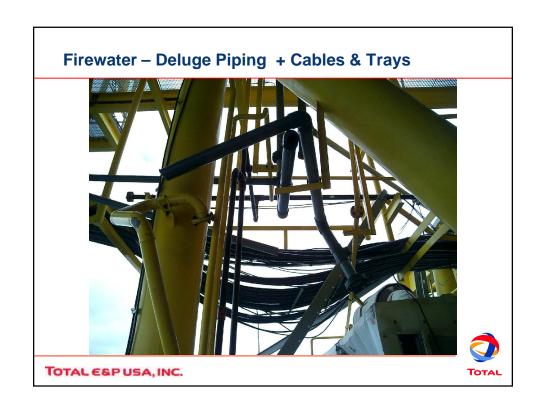


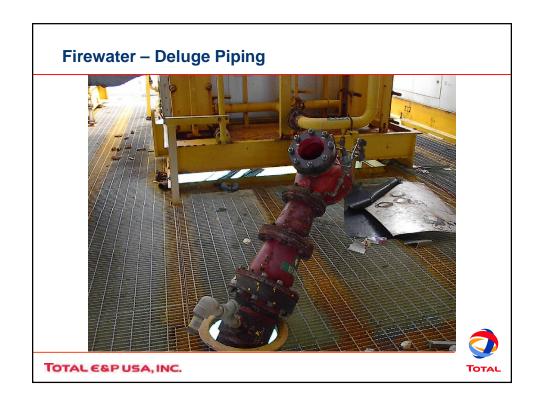


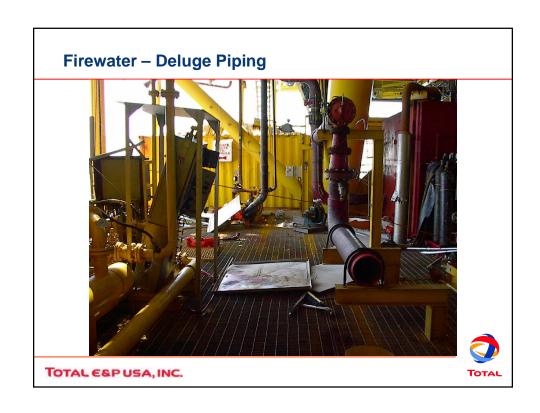


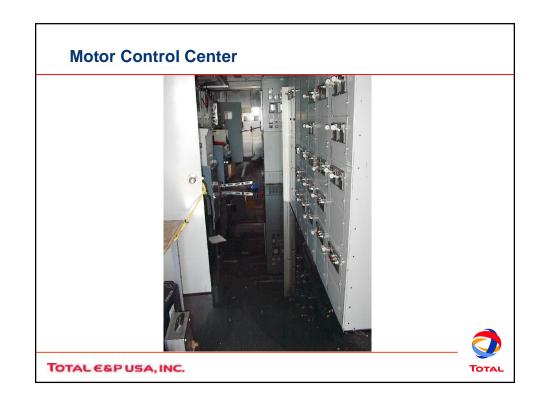


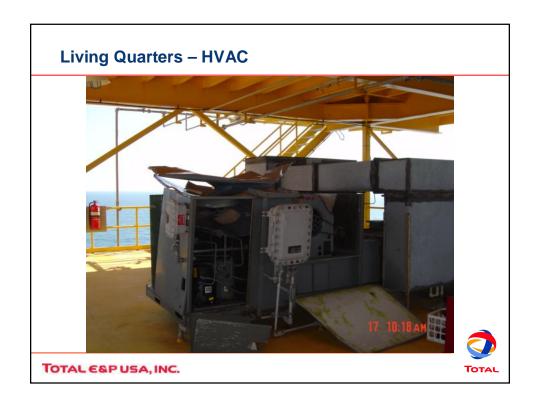












Virgo (VK823)

Reconstruction Project Development

TOTAL

Project Planning

- Habitation (Oct. 25, '04)
 - Life Support
 - Accommodations
 - Safety / USCG / MMS
- Facility: Estimated 6 month repair (ie: April 2005)
- Project Meeting with Partners & DIGP
- Project Scope Development (detailed)
- Project Management Support (Nov. 4, '04)
- Primary Reconstruction Contractor
 - Construction / Mechanical
 - Instrumentation / Electrical

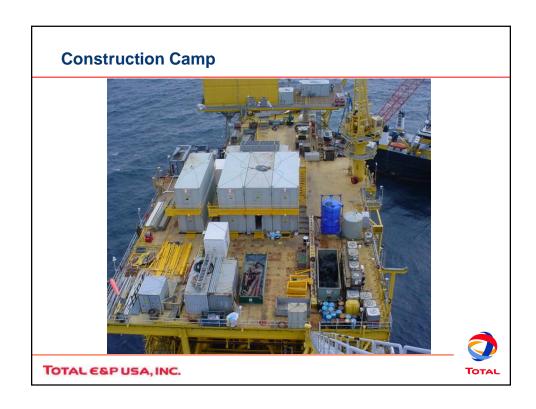


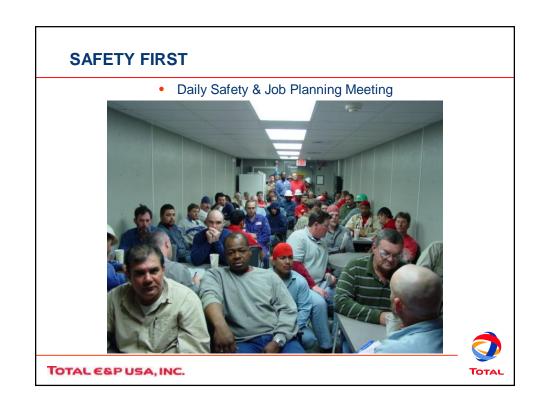
TOTAL E&PUSA, INC.

Virgo (VK823)

Reconstruction Staffing & Safety



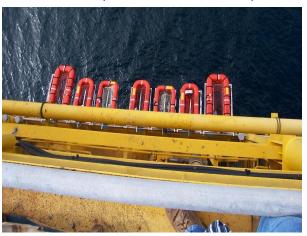








• 2 ea. – 25 person rafts + 5 ea. – 12 person rafts





SAFETY FIRST – Additional Life Saving

• 2 ea. – 25 person rafts + 5 ea. – 12 person rafts



TOTAL E&PUSA, INC.



Virgo (VK823)

Reconstruction









Reconstruction – Sub-Cellar Scaffold Deck



TOTAL E&P USA, INC.



TOTAL





Virgo (VK823)

Mid-Project Performance Re-Evaluation

TOTAL E&P USA, INC.

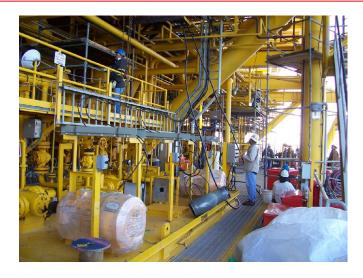


Mid-Project Re-Evaluation

- Primary Reconstruction Contractor Performance Issues
 - Itemized task sheets for reconstruction job packs
 - Adequate number of qualified craft personnel
 - Material delivery
 - Contractor Management support
- Resulted in the canceling (demanning) of mechanical / instrument / electrical craft services
- Hand-picked quality craft personnel from several different support contractors
 - Re-manned with new craft personnel



Reconstruction – Cable Installation



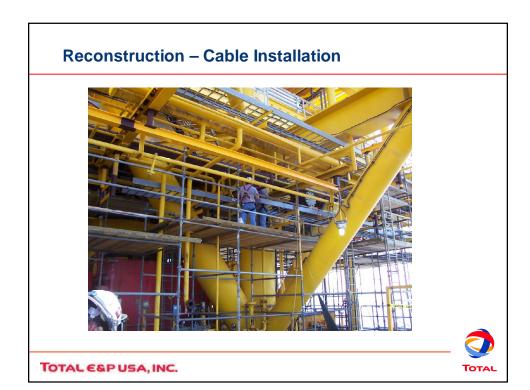
TOTAL E&PUSA, INC.

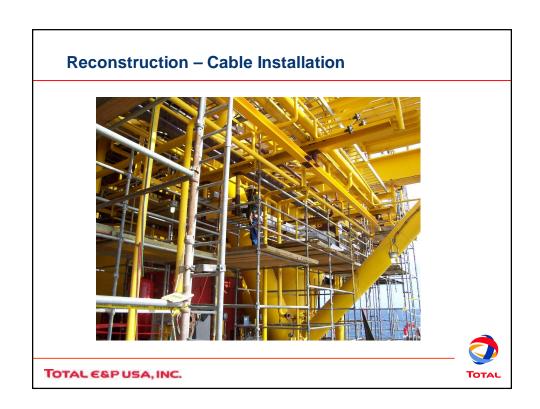
TOTAL

Reconstruction – Cable Installation









Reconstruction – Electrical & F&G Wiring



TOTAL E&PUSA, INC.

TOTAL

Reconstruction – Electrical & F&G Wiring





Reconstruction – Electrical & F&G Wiring



TOTAL E&PUSA, INC.



Reconstruction – Electrical & F&G Wiring





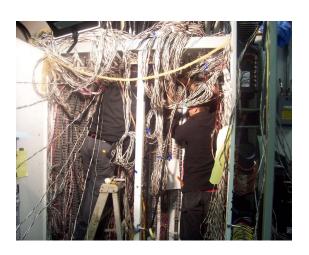
Reconstruction – Marshalling Cabinet Wiring



TOTAL E&PUSA, INC.



Reconstruction – Marshalling Cabinet Wiring





Reconstruction – Marshalling Cabinet Wiring



TOTAL E&PUSA, INC.



Reconstruction – Marshalling Cabinet Wiring





Reconstruction – Bondstrand (Firewater/Deluge)



TOTAL E&PUSA, INC.

TOTAL

Reconstruction – Bondstrand (Firewater/Deluge)





Reconstruction – Bondstrand (Firewater/Deluge)



TOTAL E&PUSA, INC.

TOTAL

Reconstruction – Bondstrand (Firewater/Deluge)





Reconstruction – Bondstrand (Firewater/Deluge)



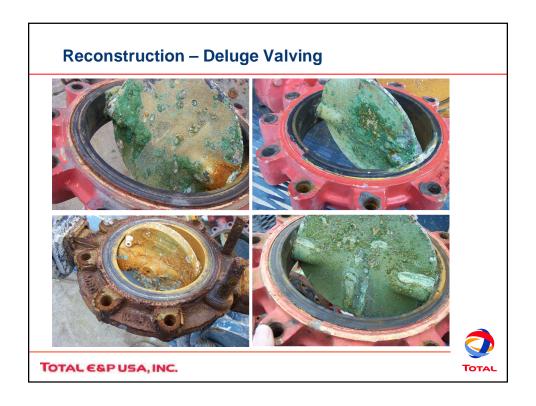
TOTAL E&PUSA, INC.

TOTAL

Reconstruction – Bondstrand (Firewater/Deluge)









Reconstruction – Generator(s) Refurbishment



TOTAL E&PUSA, INC.

Reconstruction – Generator(s) Refurbishment





Virgo (VK823)

Post Reconstruction

TOTAL E&PUSA, INC.



Post Reconstruction – Cellar Deck





Post Reconstruction – Cellar Deck



TOTAL E&PUSA, INC.

Post Reconstruction – Cellar Deck



Post Reconstruction – Cellar Deck



TOTAL E&PUSA, INC.

Тотак

Post Reconstruction – Cellar Deck





Post Reconstruction – Cellar Deck





Post Reconstruction – Cellar Deck



Post Reconstruction – Production Deck



TOTAL E&PUSA, INC.

Post Reconstruction – Production Deck





Post Reconstruction – Production Deck



TOTAL E&PUSA, INC.

Post Reconstruction – Production Deck





Post Reconstruction – Riser Fireproofing



TOTAL E&PUSA, INC.

TOTAL

Post Reconstruction – Riser Fireproofing





Post Reconstruction – Riser Fireproofing



TOTAL E&PUSA, INC.

TOTAL

Post Reconstruction – Riser Fireproofing





Post Reconstruction – Riser Fireproofing



TOTAL E&P USA, INC.



Post Reconstruction – Riser Fireproofing





Summary





Overview - Schedule

- Hurricane Sept. 13, 2004
- Multi-company review and project approval Mid-Oct. 2004
- Habitation able (Oct. 25, '04)
- CFT / Bid Award Project Management / Technical Support (Nov. 4, '04)
- CFT / Bid Award Primary Reconstruction Vendor (C-M-I&E)
- CFT / Bid Award / Mobilization Camp Facilities
- Mobilization of initial reconstruction crews
- Christmas Break (Dec. 23-26, '04)



TOTAL E&PUSA, INC.

Overview - Schedule (cont.)

- Primary Reconstruction Vendor Performance Re-evaluation Feb. '04
- Mobilization of New Support Crews (hand picked personnel) Feb. '04
- Pre-commissioning (early where possible)
- Initial Re-Start of Production April 21, 2005
- Final Post Reconstruction Demobilization



Overview - Highlights

- Maximum of up to 75 persons (including 8 Total Operations Personnel)
- 135 days from initial manning to Re-Start
- Over 10 different contractors with craft personnel working together simultaneously
- In EXCESS of 125,000 man-hours
- NO LOST TIME ACCIDENTS
- On Budget



TOTAL E&PUSA, INC.

Virgo (VK823) – Post Hurricane Ivan



TOTAL





VK989A (Pompano)

4 leg structure (with 4 intermediate legs to -75' elev.)

12 skirt piles (3 at each leg)

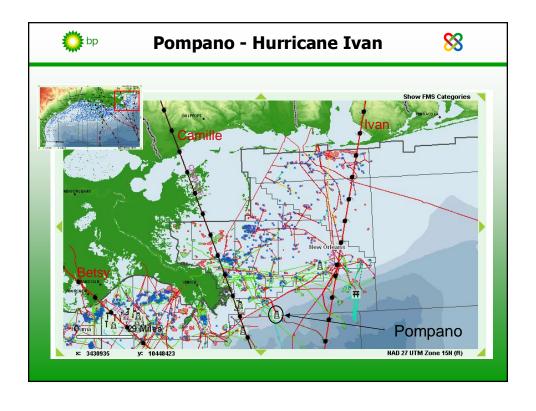
Water depth: 1284-ft*

Year installed: 1994

Long. -88°37'13.5"

Lat. 28°59'11"

*The bottom horizontal is at -1284' on the Row 1 side and -1276' on the Row 4 side to compensate for the seabed profile

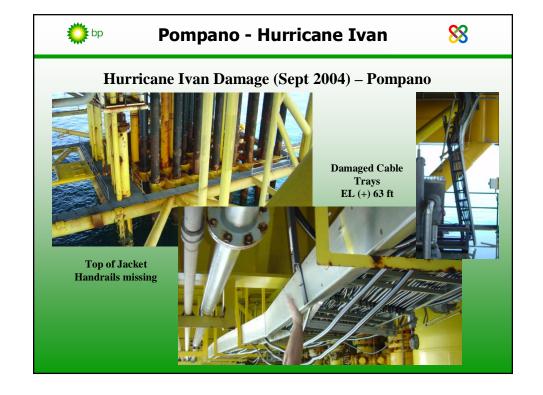






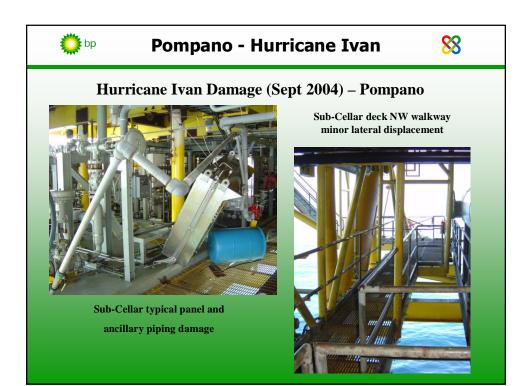
Hurricane Damage: -

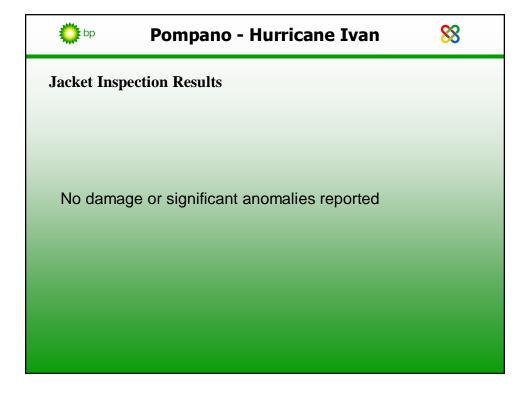
- Hurricane Ivan Damage to Pompano: -
 - Top of jacket handrails majority missing
 - Cable trays & panels damaged on sub-cellar deck
 - Piping and equipment damaged on sub-cellar deck
 - Damaged & missing grating
 - Damage to lights















Assessment Criteria: -

- API RP2A 19th Edition design criteria
 - Base comparison to original design
- API RP2A 21st Edition Section 2 L-1 design criteria
 - Today's design criteria
- API RP2A 21st Edition Section 17 L-1 design & ultimate criteria
 - Today's assessment criteria
- Hurricane Ivan Criteria
 - Hindcast study upper bound



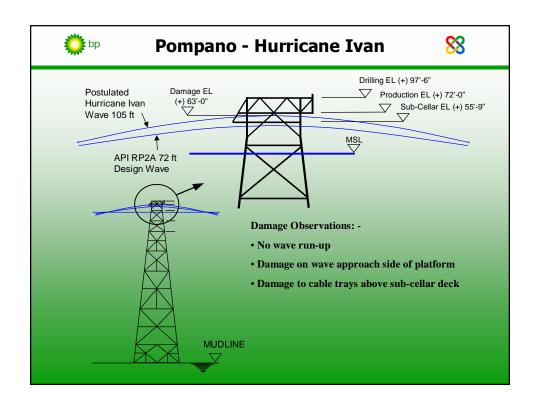
Pompano - Hurricane Ivan



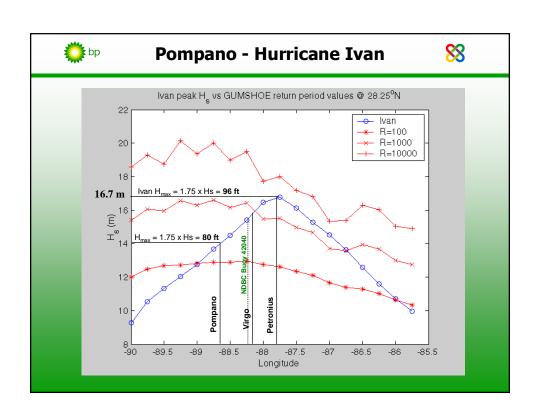
Assessment results - base shear comparison (kips)

USFOS Analyses	End-on	Broadside	Diagonal
API 21st Section 17 Ultimate Criteria (74 ft Max)	12,713	10,662	13,932
API 21st Section 2 L-1 Design Criteria (71.2 ft Max)	11,401	9,632	12,535
API 19th Section 2 Design Criteria (72 ft Max)	11,931	11,900	11,665
API 21st Section 17 L-1 Design Criteria (57 ft Max) (H _{max} of 105 ft.)	8,273	7,664	8,286
Hurricane Ivan		21,926	













Ivan Wave Observations: -

Pompano: -

- Observed damage to cable trays at EL (+) 63 ft.
- 3rd order stream function, 55% of wave above MSL
- Estimated wave height = 105 ft assuming 6ft tide & surge.
- Ultimate strength analyses correlate to Pompano surviving event.

Ivan Track at Virgo: -

- Observed damage to cable trays at EL (+) 70 ft.
- 3rd order stream function, 55% of wave above MSL
- Estimated wave height = 116 ft assuming 6ft tide & surge.

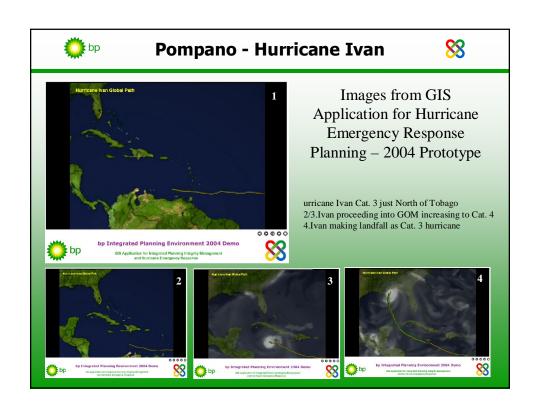


Pompano - Hurricane Ivan

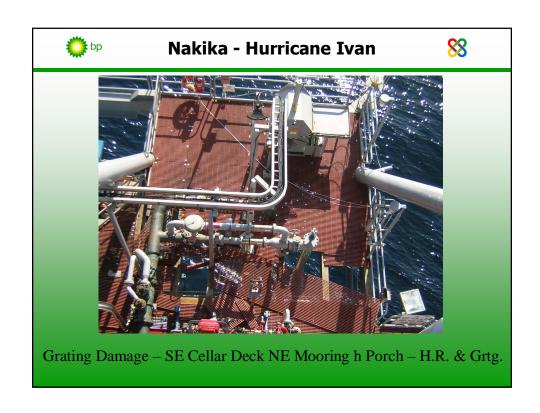


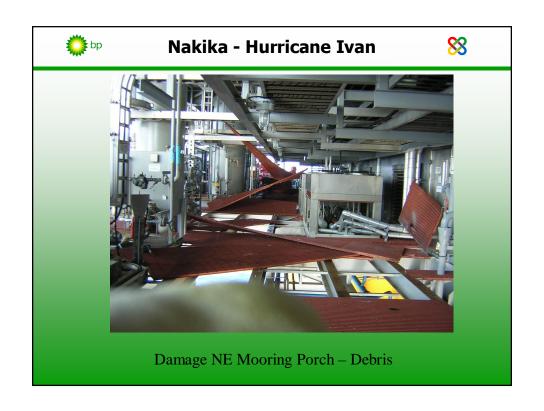
Ivan Return Period: -

- 10,000 year return event considered not possible in GOM due to extremely low central pressure required.
- Return period estimated at 500 to 600 years using 1.8 multiplier. (Rough Engineering Estimate for 100 yr Hmax = 113 ft)
- Return period estimated at 200 to 300 years using 2.15 multiplier.
- Using Hs multiplier of 2.15 provides good correlation with observed damage on Pompano and on Ivan storm track.

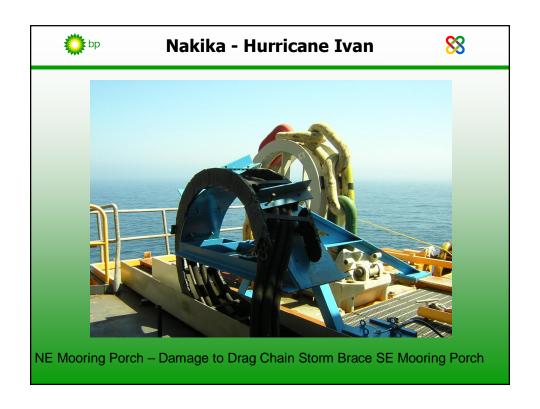


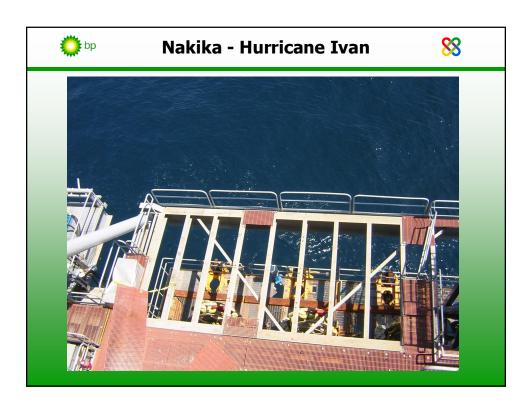














Hurricane Ivan



Points for discussion/consideration going forward: -

- API earthquake design practice considers both a design (strength) event and extreme survival (ductility) event, also draft API RP 2FB and ISO 19902
- Modern GOM fixed platforms considered likely to survive 1,000-yr event, 10,000-yr survival less likely or unknown?
- GOM fixed platforms have wave-in-deck for extreme storm waves between 100 & 1,000 year return period?
- What would be a suitable GOM survival event? 1,000-yrs? What is that wave height? What are the associated wind and current?
- Should deck heights for fixed platforms be set to a survival criteria or alternatively platforms designed for wave inundation to this criteria? or are we ok with current practice?