

**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
GULF OF MEXICO OCS REGION**

NTL No. 2020-G04

Effective Date: 10/13/2020

**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**

Inspection and Reporting for Hurricane Delta

The Bureau of Safety and Environmental Enforcement (BSEE) 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 250.106(b) and (c) to identify and describe the affected area for Hurricane Delta and to elaborate on the inspections, plans, and reports needed due to known and potential damage to OCS facilities. This NTL also references NTL No. 2009-G30, effective September 1, 2009, entitled Post-Hurricane Inspection and Reporting which also provides guidance on the inspections you need to conduct and the reports you need to prepare, and NTL No. 2015-G02, effective July 27, 2015, entitled Hurricane and Tropical Storm Effects Reports for guidance on using either email or the eWell Permitting and Reporting System to report hurricane and tropical storm effects information.

Affected Area

For planning purposes, the initial affected area for Hurricane Delta is the area that experienced hurricane force winds as defined by the National Hurricane Center. For Hurricane Delta, the initial affected area is shown in red on the attached graphic (see the attached Figure No.1).

If necessary, the initial affected area for Hurricane Delta may be updated by BSEE with a revised NTL based upon additional information, such as updated hurricane metocean data, reports of platform damage outside the initial affected area, etc., which would redefine the affected area of Hurricane Delta.

In addition, if you obtain data that indicates your facility should be included in the affected area as mentioned above, then it is BSEE's expectation that you should also comply with NTL No. 2009-G30 and NTL No. 2015-G02.

If you have difficulty determining your location on the graphic, you may call either (504) 736-7509 or (504) 736-2876.

Fixed OCS Platforms and Structures, Floating OCS Structures, Moored Mobile Offshore Drilling Units and OCS Pipelines

See NTL No. 2009-G30 for details on the surveys and inspections you need to conduct for Fixed OCS Platforms and Structures, Floating OCS Structures, Moored Mobile Offshore Drilling Units, and OCS Pipelines.

For Fixed OCS Platforms and Structures:

1. Begin immediately to conduct the required Level I and Level II/III 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 affected area. Make sure that you complete all surveys by April 8, 2021 (180 days from impact date).
2. In addition, if your Level I, II or Level III surveys find structural damage, 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 BSEE GOMR before you make major repairs of any damage. Complete all work to correct any damage you find during a platform survey before June 1, 2021.
3. By December 9, 2020 (60 days from impact date), submit the information listed below by e-mail to structures@bsee.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 April 8, 2021 (180 days from impact date).

For Pipelines:

Pursuant to 30 CFR 250.1005(a), you must conduct inspections of pipeline routes at intervals and using methods prescribed by BSEE. Under this authority, the BSEE GOMR hereby directs you to conduct the required inspections by April 8, 2021 (180 days from impact date) for pipelines in the affected area.

Complete all work to correct any damage you find during a pipeline inspection before June 1, 2021. Be reminded that before you conduct any repairs, you are to submit a repair procedure for review and acceptance to the BSEE GOMR Pipeline Section.

Safety Device Testing Departures and Returning to Production

See NTL No. 2009-G30 for guidelines pertaining to departures with respect to safety device testing and inspections due to facility damage and guidance.

If you are unable to perform your required weekly, monthly, quarterly safety device tests by November 24, 2020 (45 days from impact date), contact the appropriate BSEE GOMR District Office for a further possible extension.

Coast Guard Annual Safety Inspections

Departures for performing United States Coast Guard (USCG) Annual Safety Inspections may be granted by the appropriate USCG district office.

Hurricane and Tropical Storm Effects Reports

See NTL No. 2015-G02 for guidance on using either email or the eWell Permitting and Reporting System to report hurricane and tropical storm effects information.

Guidance Document Statement

The BSEE issues NTL's 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 alternate 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 Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3504 et seq.) requires us to inform you that the BSEE collects this information to carry out its responsibilities under the OCS Lands Act, as amended. The BSEE will use the information to determine if the structural integrity of platforms and pipelines may have been adversely affected by Hurricane Delta, 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 1014-0016; and for Platforms and Structures at 30 CFR 250, Subpart I, and assigned OMB Control Number 1014-0011. The BSEE 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.

Contacts

Please address any questions regarding platform surveys or reports to Ms. Marilyn Sauls of the BSEE GOMR Office of Structural and Technical Support by telephone at (504) 736-7509 or by e-mail at structures@bsee.gov. Address any questions regarding moored rig inspections or issues by email to either Mr. Fred Brink of the BSEE GOMR Well Operations Support Section at frederick.brink@bsee.gov or Mr. Jay Preskitt at jay.preskitt@bsee.gov. Address any questions regarding pipeline inspections or reports to Ms. Angie Gobert of the BSEE GOMR Pipeline Section by telephone at (504) 736-2876, or by e-mail at pipelines@bsee.gov. Address any questions regarding safety device inspection and testing to the appropriate BSEE GOMR District Office.

Lars T. Herbst
Regional Director

Figure 1: Hurricane Delta Affected Area
[Area of Hurricane Force Winds is in Red - Plotted using information from NOAA – National Hurricane Center]

