

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

NTL No. 2005-G14

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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 Katrina

The Minerals Management Service (MMS) 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 250.103 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 Katrina when it struck land on August 29, 2005.

OCS Platforms and Structures

Pursuant to 30 CFR 250.901(a)(4) and 250.920(a), (b), (c), and (e), 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 Katrina.

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 Katrina, the MMS GOMR has determined that you must conduct the following surveys:

Survey Level	Platform Category
I	All platforms located east of longitude 90° 45' (90.75°)
II	All platforms located east of longitude 90° 45' (90.75°)
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. Make sure that you complete all inspections/surveys by May 1, 2006. Complete all work to correct any damage you find during a platform inspection before June 1, 2006.

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 evacuation 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(b)(3) and 30 CFR 250.905 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 and pipelines that are located in the area affected by Hurricane Katrina. 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.

The MMS GOMR will review the initial inspection plans and advise you concerning their acceptability. As you gain experience from your inspection efforts, you may submit amendments to your list and inspection plans for our consideration. Thoroughly justify all requested changes. Further, submit an amendment to your inspection plan whenever the results of a Level II survey require you to conduct a Level III survey.

These information collection requirements are very similar to those required by MMS GOMR after Hurricane Ivan damaged OCS structures in the Gulf of Mexico (NTL No. 2004-G19).

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 Katrina, the MMS GOMR hereby directs you to conduct the following inspections for facilities located east of longitude 91° 30' (91.5°) **(NOTE – different from Structural inspection)** by May 1, 2006:

1. Pipeline Tie-in and Crossing 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 and foreign pipeline crossings in water depths less than 300 feet. 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. If during the course of inspecting pipeline tie-ins and crossings there are indications of pipeline movement, conduct an underwater pipeline inspection described in Item No. 4 below regardless of water depth.

2. Pipeline Riser Inspections - Conduct a visual inspection of the above-water portion of each pipeline riser in all water depth ranges. 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 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. Inspect the riser, vortex-induced vibration (VIV) suppression devices, and the connection point (flexible element, titanium stress joint, etc.) to the structure for damage.

The chart below summarizes and clarifies those portions of a pipeline that require inspections according to the water depth range.

If the water depth range is	Then inspect all
0 to 299 feet	subsea tie-ins; and pipeline crossings.
All water depths	risers, including steel catenary risers.

4. Additional inspections. If you suspect that Hurricane Katrina may have damaged a pipeline or related structure that is located west of longitude 91° 30' (91.5°) conduct the appropriate inspections described in Items Nos. 1, 2, and 3, above.

After OMB approval is obtained, the MMS GOMR will likely issue an NTL that will require you to submit your inspection results.

A repair procedure must be submitted prior to conducting any repair operations.

If you haven't already done so, perform a leak test before you return to service any pipeline located east of longitude 91° 30' (91.5°). Make sure that the leak test successfully tests the

integrity of the pipeline. 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.

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 (281) 986-6165 or by e-mail at structures@mms.gov. Address any questions regarding pipeline inspections or reports to Mr. Alex Alvarado of the GOMR Pipeline Section by telephone at (281) 986-6157, (281) 755-5204 or by e-mail at pipelines@mms.gov.

Paperwork Reduction Act of 1995 Statement: The collection of information referred to in this NTL provides clarification, description, guidance, or interpretation of requirements contained in 30 CFR 250, subparts I and J. The Office of Management and Budget (OMB) approved the information collection requirements and assigned OMB control numbers 1010-0149 and 1010-0050. This notice does not impose additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Original Signed

Chris C. Oynes
Regional Director