

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

NTL No. 2024-G03

Effective Date: August 14, 2024

**NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL, GAS, AND SULPHUR LEASES  
AND PIPELINE RIGHT-OF-WAY HOLDERS  
ON THE OUTER CONTINENTAL SHELF**

**LIFE EXTENSION (LE<sub>x</sub>) FOR FLOATING PLATFORMS**

**INTRODUCTION**

The Bureau of Safety and Environmental Enforcement (BSEE) issues Notices to Lessees and Operators of Federal Oil and Gas Leases (NTLs) as guidance documents in accordance with 30 CFR 250.103 to clarify or provide more detail about certain regulatory requirements and to outline the information you must provide in submittals to BSEE.

This NTL provides guidance and clarification for operators requesting BSEE approval to update an approved floating platform installation application under 30 CFR 250.900(b)(1) by seeking to extend the service life period of the existing floating platform (life extension request or LEx request). The NTL addresses inquiries from industry on the topic of floating platform life extension requests, particularly on how to apply existing federal regulatory requirements for floating platform installations to extending a floating platform's service life beyond the originally approved service life. It outlines the procedure for requesting this extension as an outgrowth of the regulations for seeking platform installation approval under 30 CFR 250.900(a) and 250.900(b)(1). It also outlines the type of information BSEE needs to evaluate to determine whether your life extension request for an existing approved platform installation demonstrates continued compliance with the requirements in 30 CFR 250.900. BSEE may determine that continued operation of a floating platform installation beyond the approved service life is a violation of 30 CFR 250.107(a)(4), 250.900(a), and 250.900(b)(1).

**STATUTORY AND REGULATORY AUTHORITY**

This NTL is developed in accordance with the following statutes and regulations:

- A. The Outer Continental Shelf Lands Act, as amended, 43 U.S.C. §§ 1331 *et seq.*
- B. 30 CFR part 250, Subpart I – Platforms and Structures

**ACRONYMS AND DEFINITIONS**

The following acronyms and definitions are to be used within this NTL, and are provided for clarity:

## Acronyms:

BSEE	Bureau of Safety and Environmental Enforcement
CFR	Code of Federal Regulations
LEx	Life Extension
NTL	Notice to Lessees and Operators
OCS	Outer Continental Shelf
PVP	Platform Verification Program
USC	United States Code

## Definitions:

Design Life:	The time period assumed for defining various design parameters of a platform, such as corrosion allowance and fatigue life. The design life must be documented and submitted to BSEE in the original installation application for the platform. Design life <i>may</i> be equal to “service life” (see below).
Evaluation:	An engineering review of facility data, using engineering judgement, risk assessment, calculations, analysis, or other methods to identify anomalous conditions (e.g., assessment initiator) and to determine whether additional detailed assessment or risk reduction is required to demonstrate compliance with regulatory requirements.
Fatigue:	A material fracture failure resulting from alternating stress cycles having a maximum value less than the tensile strength of the material.
Fatigue Life:	The calculated amount of fatigue damage that the structure or component can withstand before failing, converted into time based on appropriate cyclic loading conditions. Fatigue life is a factor in determining design life.
Fit-for-Service:	A platform’s system or component adequate integrity for the intended operating conditions while maintaining design functionality.
Floating Platform:	A floating offshore installation. This includes platforms that are substantially tethered to the seafloor where the full weight (lightship weight and operating weight) is supported by buoyancy. Also commonly referred to as a floating system or floating structure.
Life Extension:	The extension of the service life of a structure or component beyond that period that BSEE originally permitted or authorized for your floating platform installation.
Service Life:	The period between a floating platform’s structure or component’s installation date and the end of service as permitted or authorized by

BSEE. Ideally, a platform's service life should be less than or equal to its design life.

You: A lessee, the owner or holder of operating rights, a designated operator or agent of the lessee(s), a pipeline right-of-way holder, or a State lessee granted a right-of-use and easement.

## **BACKGROUND**

BSEE, in accordance with 30 CFR part 250, Subpart I, is the agency that has the authority to approve the installation of OCS oil and gas platforms. To obtain this approval, an applicant must submit to BSEE an application to install the platform through the Platform Verification Program (PVP) set forth in Subpart I of the regulations. The application must include all information, documents, fees, etc., as required by 30 CFR part 250, Subpart I. This information includes the design life of the platform, as well as the fatigue life of structural components, as specified in 30 CFR 250.905(f).

BSEE's approval of the platform's installation application is limited to the performance of operations within the parameters identified in the application. This includes the design life, which BSEE (as well as industry standards, codes, and accepted engineering practice) considers to be integral to platform structural integrity, and therefore critical to the operational safety of the platform.

A floating platform and its component systems that have been properly designed, fabricated, installed, operated, monitored, inspected, and maintained may continue to be fit-for-service beyond its originally approved service life. However, BSEE approvals of a floating platform pursuant to 30 CFR part 250, Subpart I, are time-limited to an approved service life and are not valid beyond that BSEE-approved service life. As required under 30 CFR 250.903, the operator must compile, retain, and make available to BSEE relevant engineering design data, to all practicable extents, after BSEE's initial approval of the service life and throughout the use of the platform. This includes information related to the fatigue requirements specified in 30 CFR 250.908, as well as those requirements specified within the documents incorporated by reference (see 30 CFR 250.901).

An existing floating platform that you want to use beyond its originally approved service life must be re-evaluated to demonstrate it is fit for continued service beyond what was submitted, documented, and subsequently approved by BSEE, through an update to the installation application that BSEE refers to as a life extension request. This NTL sets forth the process for submitting and seeking approval of a life extension request.

## **GENERAL GUIDANCE**

Under 30 CFR 250.900(b)(1), you were required to file an application to get approval for the installation of your existing floating platform. As part of that approval, BSEE identified a service life for the platform. If your existing floating platform is reaching the end of its BSEE-approved service life as approved in your initial platform installation application, and you would like to continue using it past that service life timeframe, you need to update your installation application

under 30 CFR 250.900(b)(1) to show that you will continue to meet the requirements applicable to all platforms if the service life is extended, and you must obtain renewed approval from BSEE for your installation application service life extension update. BSEE refers to this request for an installation application update as a life extension request. BSEE considers a life extension request to be necessary to ensure that your floating platform is used, maintained, inspected, and assessed in a way that ensures structural integrity for safe operations pursuant to 30 CFR 250.900(a). BSEE requests that you submit any life extension requests when the floating platform reaches no less than five (5) years before the end of the existing BSEE-approved service life to give BSEE sufficient time to assess whether the service life may be extended.

To help facilitate an expeditious BSEE review, all engineering design, analysis, evaluation, etc., that supports your request should be conducted by or under the direct supervision of a registered professional or structural engineer, naval architect, marine engineer, or equivalent, with substantial experience working with floating platforms. Also, the PVP (see 30 CFR 250.909 through 250.918) may apply to your life extension request. BSEE encourages potential applicants for life extensions to contact BSEE prior to submitting the life extension request if assistance is needed in determining if the PVP, as described under 30 CFR 250.910, applies.

If you do not intend to use the floating platform beyond its originally authorized service life, you must decommission the platform in accordance with your lease obligations and the applicable regulations of 30 CFR part 250, Subpart Q.

## **PROCEDURE**

If you want to continue operating the platform beyond the BSEE-approved service life that is reflected in your existing installation application approval, you should follow the procedures below. Submit life extension requests before the floating platform reaches five (5) years before the end of the existing BSEE-approved service life. If your floating platform is already within five (5) years from reaching the end of its service life as of the date of this NTL, you should follow the procedures now.

- A. To ensure the structural integrity of your platform (see 30 CFR 250.900(a)) beyond its original service life, submit to BSEE a LEx request for approval. You should perform, and include in your LEx request submittal as an outgrowth of your installation application approval (see 30 CFR 250.900(b)(1)), the following, as applicable:
  1. An engineering evaluation demonstrating that the floating platform can safely operate to the desired service life extension date. If you need additional guidance, you are encouraged to contact BSEE prior to submitting a life extension request.
  2. An application for major modification that complies with the PVP at 30 CFR 250.909-250.918, if:
    - a. Structural changes to your floating platform are needed to achieve the desired service life extension, and
    - b. The structural changes qualify as a major modification as set forth in 30 CFR 250.900(b)(2).

3. An application for major repair that complies with the PVP at 30 CFR 250.909-250.918, if:
  - a. Repairs to your floating platform are needed to achieve the desired service life extension, and
  - b. The repairs to your platform qualify as a major repair as set forth in 30 CFR 250.900(b)(3).
  
- B. Your life extension request may be submitted electronically through BSEE's TIMSWeb submittal portal. If you submit the request through TIMSWeb, submit it under the TIMSWeb submittal type "Life Extension." Additionally, major modification and major repair applications must be submitted separately under their respective submittal type and set to be "Associated" with the "Life Extension" submittal within the TIMSWeb portal.
  
- C. If you want to decommission your floating platform, you must submit an official platform decommissioning application in accordance with your lease obligations and the regulatory requirements at 30 CFR part 250, Subpart Q.

### **Guidance Document Statement**

BSEE issues NTLs as guidance documents in accordance with 30 CFR 250.103 to clarify 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 guidance that provides a clear and consistent approach to submitting certain requests pursuant to the applicable regulations.

### **Paperwork Reduction Act (PRA) Statement**

The Office of Management and Budget (OMB) has approved the information collection requirements and assigned OMB Control Number 1014-0011 for 30 CFR part 250, Subpart I. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 *et seq.*).

### **Contact**

If you have any questions regarding this NTL, you may contact GOMR Office of Structural and Technical Support (OSTS) by e-mail at [structures@bsee.gov](mailto:structures@bsee.gov).

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