

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT

NTL No. 2024-N03

Effective Date: 12/17/2024

**NATIONAL NOTICE TO LESSEES AND OPERATORS OF
FEDERAL OIL AND GAS LEASES ON THE OUTER CONTINENTAL SHELF**

Restricting Access to Unsafe Areas Due to Corrosion

Purpose

This Notice to Lessees and Operators (NTL) offers guidance on how lessees and operators should restrict access to areas with unsafe levels of corrosion on the walking or working surfaces of drilling rigs, production facilities, and unmanned well caissons or pump stations located on the Outer Continental Shelf (OCS).

Authority

As required by 30 CFR 250.107, *What must I do to protect health, safety, property, and the environment?*

You must protect health, safety, property, and the environment by “[m]aintaining all equipment and work areas in a safe condition.” 30 CFR 250.107(a)(2).

You must protect health, safety, property, and the environment by “[u]tilizing recognized engineering practices that reduce risks to the lowest practicable level when conducting design, fabrication, installation, operation, inspection, repair, and maintenance activities.” 30 CFR 250.107(a)(3).

“You” is defined in BSEE regulations at 30 CFR 250.105 as “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.”

Guidance

When an area is unsafe for access due to excessive corrosion, you should immediately barricade the area with a rigid barrier. If a rigid barrier is not immediately available, then other types of barriers (e.g., rope, tape) may be used temporarily (less than 48 hours) until a rigid barrier can be constructed and installed.

You should document when the corrosion was observed and when the barriers were implemented. Any additional measures required to restrict access to the area should be promptly taken as needed. You should also immediately ensure that all personnel on the facility are made aware of the hazards associated with the restricted area by conducting a “Safety Stand Down.”

You should also notify any newcomers to the facility of the hazards associated with the restricted area until the hazard is remedied.

If the area to be restricted includes stairs, boat landings, egress routes, or access to in-service equipment, in order to ensure that all equipment and work areas are in a safe condition, in accordance with 30 CFR 250.107(a)(2), you should communicate with the appropriate BSEE district office to determine:

1. whether in-service equipment may safely remain in service,
2. whether a manned facility may remain manned, and
3. whether an unmanned facility may be safely boarded.

Failure to appropriately barricade the corroded area may result in BSEE issuing orders to ensure compliance with the regulations, including issuing orders to shut-in operations that constitute a threat of serious, irreparable, or immediate harm to health, safety, property, or the environment. 30 CFR 250.107(d).

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 complying with a regulatory requirement.

Paperwork Reduction Act

The Office of Management and Budget (OMB) has approved the information collection requirements and assigned OMB Control Number 1014-0022 for Subpart A regulations. 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, please contact:

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