

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

NTL No. 2009-G23

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NOTICE TO LESSEES AND OPERATORS OF FEDERAL OIL AND GAS LEASES
OUTER CONTINENTAL SHELF, GULF OF MEXICO OCS REGION

Structure Assessment Before Moving a Platform Rig

This Notice to Lessees and Operators (NTL) provides guidance to ensure that the loads imposed by a platform rig moving onto an existing platform do not compromise the structural integrity of the platform for the safe conduct of drilling, workover, completion, production, decommissioning, or other operations in compliance with 30 CFR 250.900(a). This NTL applies to both fixed and floating platforms.

For purposes of this NTL, a platform rig is any rig that has its derrick substructure or drilling mast placed on and supported by a platform.

The Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) must ensure that a structural review is performed when you propose operations using a platform rig. Therefore, in accordance with 30 CFR 250.418(h), 250.509, 250.609, and 250.1703(a) and (f), if you are proposing to utilize a platform rig to perform drilling, workover, completion, decommissioning, or other well operations, complete the checklist in the Appendix to this NTL and include it with your Application for Permit to Drill (APD) (Form MMS-123) or Application for Permit to Modify (APM) (Form MMS-124). If you answer any of the questions contained in the Appendix with a "Yes," attach supporting information, such as calculations and explanations, to the checklist. Also, attach a statement that attests that the checklist and supporting information have been certified by a recognized classification society, a registered civil or structural engineer or equivalent, or a naval architect or marine engineer or equivalent, specializing in the design of offshore structures.

If the platform rig move trips any of the platform assessment initiators listed in sections 17.2.1 through 17.2.5 of API RP 2A-WSD, 21st Edition, you must perform a platform assessment in accordance with 30 CFR 250.920(a). If the platform does not pass this assessment, you must initiate mitigation actions accordance with 30 CFR 250.920(b).

Guidance Document Statement

The MMS issues NTL's as guidance documents in accordance with 30 CFR 250.103 to clarify, supplement, and provide more detail about certain MMS 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 MMS office under 30 CFR 250.141.

Paperwork Reduction Act of 1995 Statement

The information referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR Part 250, Subparts D, E, F, I, and Q. The Office of Management and Budget (OMB) has approved the information collection requirements in these regulations under OMB Control Numbers 1010-0141, 1010-0067, 1010-0043, 1010-0149, and 1010-0142, respectively. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contacts

Please contact Fung Chan Hassenboehler of the MMS GOMR Office of Structural and Technical Support by telephone at (504) 736-2893 or by email at fung.chan@mms.gov if you have any questions regarding platform assessments. Contact either the Drilling Engineer or the Workover/Completion Engineer in the appropriate MMS GOMR District Office if you have any questions regarding APD's or APM's.

[original signed]

Lars T. Herbst
Regional Director

Appendix

Appendix

Checklist for Assessing a Structure Prior to Platform Rig Move-On

No.	Question	Yes	No
1	Does the rig move operation necessitate a major structural modification (see 30 CFR 250.900(b)(2))? If yes, submit a structural modification application to the MMS GOMR for approval in accordance with 30 CFR 250.900(b)(2).		
2a	Are you using a platform that was <i>not</i> originally designed for a platform rig? If yes, include calculations and other supporting information that demonstrates that the platform is fit to support the rig.		
OR			
2b	If the platform was originally designed for a platform rig, then		
	Have you conducted any activities since moving a platform rig off the platform that adversely affect the capacity of the platform to support the proposed rig? If yes, include a description of those activities and their effect.		
	Does the proposed platform rig have a higher hook load, a higher wind loading area, and/or higher deck loading than the original design platform rig? If yes, include calculations that demonstrate that the platform is fit to support the rig under those conditions.		
3	Did the latest Level I, II, and III surveys, as specified in Section 14.3 of API RP 2A-WSD, 21 st Edition, detect any structural corrosion problems and/or any structural damages? If yes, include a description of the problems or damage and the actions you took to mitigate their effects.		
4a	For fixed platforms, is the deck height lower than the required minimum height? If yes, include a demonstration of how the deck height will be sufficient for the rig move operation. Refer to the following for guidance:		
	For platforms designed to API RP 2A-WSD, 19 th Edition or earlier editions, or before the 1 st Edition of that publication, the minimum height is specified in Section 17, Figure 17.6.2-2b, of API RP 2A-WSD, 21 st Edition.		
	For platforms designed to API RP 2A-WSD, 20 th or 21 st Editions, the minimum height is specified in Section 2, Figure 2.3.4-8, of API RP 2A-WSD, 21 st Edition.		
	For platforms designed to API Bulletin 2INT-MET, the minimum height is specified in Section 3.2 API Bulletin 2INT-DG.		
OR			
4b	For floating platforms, will the rig move operation impose additional loads to the platform which will adversely change the design draft of the platform? If yes, include a discussion of the impact of draft change on global performance of platform, including stability, minimum air gap, and minimum tendon tension requirements (for TLP's).		
5	For the proposed rig move, was the platform <i>not</i> checked globally, accounting for all corrosion and structural damage? If yes, include an explanation of the reason it was not checked.		
6	For the proposed rig move, was the platform <i>not</i> checked locally accounting for all corrosion and structural damage? If yes, include an explanation of the reason it was not checked.		
7	Are there tie-down systems associated with the rig package that are not designed, fabricated, and installed in accordance with the guidance provided in Section 4 of API Bulletin 2INT-DG and API Bulletin 2TD? If yes, include a description of how the proposed tie-down systems are equivalent to or exceed the referenced guidance.		