

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

NTL No. 2003-G01

Effective Date: January 14, 2003
Expiration Date: June 30, 2003

**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 Lili

The Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) is issuing this Notice to Lessees and Operators and Right-of-way Pipeline 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 Lili on October 2, 2002.

OCS Platforms and Structures

Pursuant to 30 CFR 250.912(a), you must periodically inspect OCS platforms and structures (platforms) in accordance with the provisions of American Petroleum Institute Recommended Practice 2A, Nineteenth Edition (API RP 2A), Section 14, Surveys.

Subsection 14.4.3 of API RP 2A 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). Hurricane Lili qualifies as such an event.

Subsection 14.3.1 of API RP 2A 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 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 14.3.2 of API RP 2A 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 Lili while it was a category III/IV storm, the MMS GOMR has determined that you must conduct a Level II survey on every platform that was directly exposed to the hurricane. A platform received direct exposure if it is located within 25 miles of Hurricane Lili's eye center storm track while it was a category III/IV storm (see Attachment B of this NTL for a map of the described area). Additionally, the MMS GOMR has determined that you must conduct a Level III survey if the platform is in the described area and experienced wave loading on the deck, or if a previous engineering evaluation indicated areas of the platform particularly susceptible to structural damage.

Begin immediately to conduct the required surveys of those platforms located in the described area. We encourage you to inspect first older platforms located nearest the eye center storm track, and then gradually inspect those platforms toward the outer limits of the described area.

Prepare a list of all your OCS structures in the described area. For each listed platform, prepare an initial inspection plan that generally describes the work you will perform to determine the condition of the structure. In addition, prepare a timetable that shows that you will complete all inspections by May 1, 2003. Submit the list, the initial inspection plans, and the timetable by mail to the MMS GOMR Office of Structural and Technical Support (MS 5210) or by e-mail to tommy.laurendine@mms.gov by February 14, 2003. We 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.

Within 30 days after completion of each platform inspection, send a report by mail to the MMS GOMR Office of Structural and Technical Support (MS 5210) or by e-mail to tommy.laurendine@mms.gov that describes in detail any detected damage that may adversely affect structural integrity. Damage to such items as walkways, handrails, and boat bumpers is not considered structurally significant. For each platform that sustained significant adverse damage, include an assessment of its ability to withstand anticipated environmental storm conditions and any remediation plans. Complete all work to correct any damage you find during a platform inspection before June 1, 2003.

OCS Pipelines

Pursuant to 30 CFR 250.1005(a), you must conduct inspections of pipeline routes at time 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 Lili, the MMS GOMR hereby directs you to conduct the following inspections by May 1, 2003:

1. Pipeline Tie-in Inspections - Conduct an underwater visual inspection by divers or ROV of each of your OCS pipeline tie-ins located within 25 miles of Hurricane Lili's eye center storm track (see Attachments A and B of this NTL for maps of the described area). 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.
2. Pipeline Riser Inspections - Conduct a visual inspection of the above-water portion of each pipeline riser located within 25 miles of Hurricane Lili's eye center storm track (see Attachments A and B of this NTL for maps of the described area). 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 described in paragraph No. 3 below (if you are not already required to do so) to determine if the pipeline has been displaced or exposed.
3. Underwater Riser and Pipeline Inspections - Conduct a visual inspection by divers or ROV of the underwater portions of each of your OCS pipeline risers and adjacent pipelines located within 25 miles of Hurricane Lili's eye center storm track while it was a category III/IV storm (see Attachment B of this NTL for a map of the described area). Conduct this riser and pipeline inspection in conjunction with the required platform Level II surveys described above. Inspect the riser and riser clamps for damage. Inspect the pipeline for evidence of displacement or exposure from the base of the riser to a point at least 200 feet from the base of the riser.
4. Remedial Action - If an inspection indicates (a) factors that could detrimentally affect the performance or integrity of pipeline valves and fittings at a tie-in, (b) conditions that could cause interference with navigation or other uses of the OCS, (c) riser or riser clamp damage, or (d) that a pipeline has been displaced or exposed, submit a plan of corrective action, pursuant to the requirements of 30 CFR 250.1008(g), by mail to the GOMR Pipeline Section (MS 5232) or by e-mail to elizabeth.komiskey@mms.gov for approval within 30 days after completing the inspection. Submit a written report describing your remedial action by mail to the GOMR Pipeline Section (MS 5232) or by e-mail to elizabeth.komiskey@mms.gov within 30 days after you complete the work. Complete all work to correct any damage you find during a pipeline inspection before June 1, 2003.

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 MMS collects this information to carry out its responsibilities under the OCS Lands Act, as amended. The MMS will use the information to determine if the structural integrity of platforms may have been damaged by Hurricane Lili, if any such pose 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. We estimate the public reporting burden to average 740 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. The OMB has approved this collection of information and assigned OMB control number 1010-0152. Direct comments regarding the burden estimate or any other aspect of this collection of information to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, Department of the Interior, 1849 C Street, N.W., Washington, D.C. 20240.

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 (504) 736-5709 or by e-mail at tommy.laurendine@mms.gov and questions regarding pipeline inspections or reports to Ms. Elizabeth Komiskey of the GOMR Pipeline Section by telephone at (504) 736-2418 or by e-mail at elizabeth.komiskey@mms.gov.

Chris C. Oynes
Regional Director

[Attachments](#)