

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

NTL No. 2009-G16

Effective Date: June 25, 2009
Expiration Date: November 30, 2009

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

Global Positioning Systems for Mobile Offshore Drilling Units

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2009-G08, effective June 1, 2009, on this subject. It changes the expiration date, provides a warning regarding failure to follow the guidance and requirements in the NTL, and revises the Paperwork Reduction Act statement.

Purpose

This NTL provides guidance and requirements for:

- Outfitting all mobile offshore drilling units (MODU) that are moored, including jackup rigs, with multiple global positioning system (GPS) transponders that are installed and operational by July 01, 2009.
- Providing the Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) with access to real-time GPS location data.
- Contacting the MMS GOMR Continuity of Operations Plan (COOP) office when a MODU moves off location during a storm event.

Failure to follow the guidance and requirements contained in this NTL may delay the approval of an Application for Permit to Drill (APD) or result in its disapproval.

Authority

This NTL provides this guidance and requirements pursuant to 30 CFR 250.106(c), 30 CFR 250.107(d), 30 CFR 250.280(b), and 30 CFR 250.417(a). Specifically, under

- 30 CFR 250.106(c), the MMS GOMR regulates operations to prevent damage to or waste of any natural resource, property, or the environment.
- 30 CFR 250.107(d), the MMS GOMR may require additional measures to ensure the use of best available and safest technology.
- 30 CFR 250.280(b), you must take appropriate measures to meet emergency situations.
- 30 CFR 250.417(a), you must demonstrate that the MODU you plan to use is capable of performing at the proposed drilling location.

Background

The effects of several hurricanes in the past few years have been detrimental to oil and gas operations on the OCS in the Gulf of Mexico. These effects included structural damage to fixed production platforms, platform rigs, semi-submersibles, jack-up rigs, and other equipment and facilities. Moreover, a major concern for MMS is the problem of a MODU being moved off location by a storm event. When a MODU is displaced by a storm event, there are potentially serious consequences if it strikes or otherwise damages other facilities, pipelines, or vessels. In March 2009, an incident occurred that involved a large oil tanker striking a missing jack-up rig that had drifted off location and sunk during Hurricane Ike in 2008.

A GPS device provides a method to locate and track a displaced MODU during and after a storm event. This NTL only involves the aspect of using real-time GPS tracking while the MODU is still afloat. However, the MMS GOMR encourages you to investigate and consider implementing any new or existing technologies that will enable you to locate a sunken MODU. Having both the GPS real-time data and sunken MODU location will provide a valuable tool to prevent future incidents involving a lost or sunken MODU.

GPS Tracking Systems

Perform the following:

- Outfit each MODU with multiple GPS transponders that are installed and operational by July 01, 2009.
- Equip each MODU with a GPS system that provides a robust and reliable means of monitoring the position and tracking the path in real-time if the MODU moves from its location during a severe storm.
- Install and protect the tracking system's equipment to minimize the risk of the system being disabled by storm damage.
- Place multiple GPS transponders in different locations for redundancy to minimize risk of system failure.
- Make sure that each GPS transponder is capable of transmitting data for at least seven days after a storm has passed.

GPS Real-time Data Access

Ensure that you allow the MMS GOMR real-time access to the MODU location data. By July 01, 2009, contact Lance Labiche by telephone at (504) 736-2433 or by e-mail at lance.labiche@mms.gov with information on how you are granting this access. This information can be provided by you or your drilling contractor.

If your MODU moves off location during a storm event, immediately begin to record the GPS location data and contact the MMS GOMR COOP office with the following information:

- Lessee or operator name.
- Contact information.
- Rig/facility/platform name.

- Initial date and time.
- How you provided GPS real-time data access.

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 regulatory requirements that provides a clear and consistent approach to complying with those requirements. However, if you wish to use an alternative 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 collection referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR 250, Subpart A, General. The Office of Management and Budget (OMB) has approved the information collection requirements in these regulations under OMB Control Number 1010-0177. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contact

If you have any questions regarding this NTL, please contact Lance Labiche by telephone at (504) 736-2433 or by e-mail at lance.labiche@mms.gov.

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