

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

NTL No. 2009-G10

Effective Date: June 1, 2009
Expiration Date: November 30, 2014

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

**Guidelines for Jack-up Drilling Rig Fitness Requirements
for Hurricane Season**

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2008-G10, effective June 1, 2008, on this subject. It includes the provision for using a checklist to provide information regarding jack-up rig fitness, provides a guidance document statement, and updates contact information.

The purpose of this NTL is to provide guidance on the information you must submit with your Form MMS-123, Application for Permit to Drill (APD) to demonstrate the fitness of any jack-up drilling rig you will use to conduct operations in the Gulf of Mexico (GOM) OCS during hurricane season. As required by 30 CFR 250.417(a), this information must demonstrate that the associated jack-up drilling rig is capable of performing at the proposed drilling location.

The Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) will use the recommendations in the American Petroleum Institute's (API) *Recommended Practice 95J, Gulf of Mexico Jackup Operations for Hurricane Season – Interim Recommendations, First Edition* (API RP 95J), to guide our review and evaluation of the information and data that demonstrate the jack-up rig's capability to perform at the proposed location. The MMS GOMR highly recommends that you follow the recommendations in API RP 95J as you prepare APD's to conduct drilling operations during hurricane season. Failure to follow the recommendations in API RP 95J may delay the approval of an APD or result in disapproval. This guidance also applies to jack-up rig operations you conduct under Form MMS-124, Application for Permit to Modify (APM).

Background

The effects of Hurricanes Ivan, Katrina, Rita, and Ike during the 2004, 2005, and 2008 hurricane seasons were detrimental to oil and gas operations on the OCS. These effects included structural damage to fixed production facilities, semi-submersibles, and jack-up rigs. During these hurricanes, twelve jack-up rigs experienced a total failure of station-keeping ability. Additionally, there were several moored MODU's that were unable to keep station through these storms. Interim guidelines for improved moored MODU station-keeping are addressed in NTL No. 2008-G09, effective June 1, 2008.

Fortunately, these hurricanes did not cause any loss of life or significant pollution because of industry's ability to secure wells and evacuate personnel successfully. However, the MMS GOMR is concerned about the loss of these facilities and rigs as well as the potential for catastrophic damage to key infrastructure and the resultant pollution from future storms. In an effort to reduce these effects, real and potential, the MMS GOMR has set forth guidance to ensure compliance with 30 CFR 250.417 and to improve performance in the area of jack-up rig station-keeping during the environmental loading that may be experienced during hurricanes.

Scope

This guidance covers drilling, workover, and completion operations conducted by jack-up rigs during hurricane season. All jack-up rigs that will be used to drill, complete, or workover a well under an APD or APM after the effective date of this NTL are covered by the requirements set forth below. The jack-up rig information required for permitting a well during hurricane season relates primarily to foundational issues addressed in the pre-loading process and determination of the appropriate air gap for a specific well location. Information regarding procedures to secure and protect wells in open water locations when the rig is secured prior to hurricane evacuations is also required.

If you already have an approved APD or APM and you plan to use a jack-up rig to drill or conduct other well operations during hurricane season (between June 1 and November 30), revise the APD or APM and submit it to the appropriate MMS GOMR District Manager for approval. In the revised APD or APM, provide the information listed in items Nos. 1 through 3 as outlined below under "Jack-up Rig Fitness." In accordance with 30 CFR 250.125(a), you do not need to pay a service fee to MMS for processing a revision to an APD or APM.

Jack-up Rig Fitness

The MMS GOMR has determined that the level of detail and recommendations set forth in the API RP 95J will help to bring about the sought after improvement in performance during hurricane season. Therefore, the MMS GOMR will use API RP 95J to review and evaluate the information submitted with each APD or APM. The MMS GOMR highly recommends that you follow these same recommendations as you prepare APD's and APM's for operations you will conduct during hurricane season.

At a minimum, include the following information in your APD's and APM's to demonstrate compliance with the requirements of 30 CFR 250.417(a):

1. A completed Jack-up MODUs Assessment Checksheet (Checksheet). You can find this Checksheet on the MMS Internet Web Site at <http://www.mms.gov/tarprojects/593.htm>. You can access the Checksheet by clicking on the "AC" link and the background information for the Checksheet by clicking the "AB" link.
2. The rig contractor's anticipated preloading procedures and holding times that are proposed to minimize the potential for further settlement from potential hurricane loading.
3. Any additional information that would mitigate or otherwise alter these jack-up rig fitness requirements for the upcoming hurricane season.

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 collection referred to in this NTL is intended to provide clarification, description, or interpretation of requirements contained in 30 CFR 250, Subpart D, Oil and Gas Drilling Operations. The Office of Management and Budget (OMB) has approved the information collection requirements in these regulations under OMB control number 1010-0141. This NTL does not impose additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contacts

Please direct any questions you may have regarding this NTL to Lance Labiche by telephone at (504) 736-2433 or by e-mail at lance.labiche@mms.gov or to Kyrston Banks by telephone at (504) 736-2828 or by e-mail at kyrston.banks@mms.gov.

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