

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

NTL No. 2009-G11

Effective Date: June 1, 2009  
Expiration Date: May 31, 2014

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

**Accidental Disconnect of Marine Drilling Risers**

This Notice to Lessees and Operators (NTL) supersedes Notice to Lessees and Operators (NTL) No. 2000-G07, effective February 22, 2000, on this subject. It updates a regulatory citation and contact information and includes a guidance document statement.

An incident occurred on a drillship that had the potential for causing a serious well control event. An employee was attempting to conduct a function test of the blind-shear rams. However, he inadvertently pushed the lower marine riser package (LMRP) button instead of the blind-shear ram button on the control panel. Since the LMRP button was not part of the primary or emergency disconnect sequence, the pod stabs did not retract and the blind-shear rams did not close. The disconnection of the LMRP allowed the release of drilling mud from the riser. Fortunately, the wellbore was cased, and a well control event caused by a loss of riser hydrostatics did not occur.

Regulation 30 CFR 250.107(a)(1) requires you to protect health, safety, property, and the environment by performing all operations in a safe and workmanlike manner. Regulation 30 CFR 250.401 requires you to take necessary precautions to keep wells under control at all times. Panels and processes that control important systems that are not designed to reduce the possibility of human error do not comply with these requirements.

Therefore, perform the following to ensure that an incident similar to the one described above does not occur while you conduct operations from floating drilling rigs:

1. Implement measures to lock out any LMRP disconnect (hydraulic or electro-hydraulic) that is not part of a sequential disconnect process (i.e., a process that ensures that a well is secured by blind or blind-shear rams before the riser disconnects) before the blowout preventer (BOP)/LMRP enters the water. These measures can include the use of electronic exclusion switches and bolted covers. A cover that is easily removed or lifted to gain access to the LMRP release control function is not sufficient. Ensure that you equip any computer-based LMRP disconnect function with an effective lock-out. Ensure also that the locking out of a nonsequential disconnect does not affect your ability to conduct a successful primary or emergency disconnect of the riser.

2. Ensure that your sequential LMRP disconnect process (including isolating the wellbore) is designed so that the LMRP can be disconnected only as the result of a deliberate act.

3. Implement human engineering measures such as labeling the LMRP panel button to clearly distinguish it from other functions and using warning labels.

4. Ensure that all of your floating drilling rig contractors, including those with stacked rigs and drilling rigs that are moving into the Gulf of Mexico, are aware of these safety measures.

In addition, the Minerals Management Service (MMS) Gulf of Mexico OCS Region (GOMR) considers a backup BOP actuation system to be an essential component of a deepwater drilling system and, therefore, expects you to have reliable back-up systems in place for actuating the BOP in the event that the marine riser is damaged or accidentally disconnected. MMS GOMR District Managers will be assessing current and future operations for back-up BOP actuation capabilities.

### **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**

This NTL does not refer to or impose any information collection subject to the Paperwork Reduction Act of 1995.

### **Contacts**

Please address any questions you may have regarding this NTL to the appropriate MMS Gulf of Mexico OCS Region District Drilling Engineer as follows:

<i>District</i>	<i>Drilling Engineer</i>	<i>Telephone</i>
New Orleans	Frank Patton	(504) 734-6748
Houma	Ben Coco	(985) 853-5903
Lafayette	Marty Rinaudo	(337) 289-5107
Lake Charles	David Moore	(337) 480-4604
Lake Jackson	Lee Fowler	(979) 238-8125

[original signed]

Lars T. Herbst  
Regional Director