

**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
GULF OF MEXICO OCS REGION**

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

Global Positioning System (GPS) for Mobile Offshore Drilling Units (MODUs)

For the purposes of this Notice to Lessees and Operators (NTL), the term MODU or MODUs are referring to Jack-Up and Moored Semi-submersible rigs. This NTL provides guidance and requirements for:

1. Outfitting all MODUs with multiple GPS transponders;
2. Providing the Bureau of Safety and Environmental Enforcement (BSEE) real-time GPS location data; and
3. Notifying BSEE how you will provide access to real-time GPS location data and information about any instance when a MODU moves off location in a storm event.

This NTL is issued pursuant to 30 CFR 250.103 and provides guidance under §§ 250.107(a) and (d), and 250.417(a). Specifically, this NTL is based on the following regulations:

- Section 250.107(a) obligates operators to perform all operations in a safe and workmanlike manner. The use of GPS technology is necessary to ensure the safe operation of MODUs.
- Section 250.107(d) authorizes BSEE to require the use of the best available and safest technology (BAST). The use of GPS technology is a measure that constitutes the use of BAST. The required installation of a GPS system that provides a reliable means of monitoring the position and tracking of MODUs in real-time will assist in avoiding equipment failure that would have a significant effect on safety, health, or the environment. Based upon BSEE's experience with NTL No. 2009 G-16, BSEE has determined that use of such GPS technology is economically feasible and the benefits of such requirements outweigh the costs.
- Section 250.417(a), in part, requires lessees and operators using MODUs to demonstrate that the drilling unit is capable of performing at the proposed drilling location. Use of GPS technology will confirm whether a MODU has maintained that location.

Background

Past hurricanes had detrimental effect on oil and gas operations in the OCS. These effects included structural damage to fixed production platforms, platform rigs, moored semi-submersibles (MODU), jack-up rigs (MODU), and other equipment and facilities. A major concern for BSEE is the problem of MODUs moving off location by a storm event. If a MODU is displaced by a storm event, there are potentially serious consequences if it strikes or damages other facilities, pipelines or vessels. In March 2009, there was an incident involving a large oil tanker striking a missing jack-up rig (MODU) that drifted off location and sunk during Hurricane Ike in 2008. A GPS device provides a way to track and locate a displaced MODU during and after a storm event. Having GPS real-time data will provide a valuable tool to prevent future incidents involving lost MODUs.

Scope

You must ensure each MODU is equipped with a GPS system that provides a reliable means of monitoring the position and tracking the path of the MODU in real-time in the event that the MODU moves from its location during a severe storm. You must place multiple GPS transponders in different locations on the MODU for redundancy and to minimize risk of system failure. The tracking systems' equipment must be located and protected such that the risk of the system being disabled by storm damage (e.g., water damage) is minimized.

Consideration must be given to installing the equipment so the system could continue to transmit the current position as long as possible. Each GPS transponder must be capable of transmitting data for at least 7 days after the storm has passed.

GPS Real-time Data Access

You or your drilling contractor must contact District Operations Support at (504) 736-2433 to inform BSEE how you are granting BSEE real-time access to the MODU location GPS data or to report any revision or update to how you will grant BSEE access to that data.

If your MODU moves off location during a storm event, you must immediately begin to record GPS location data and contact the BSEE GOMR Continuation of Operations (COOP) office with the following information:

- Operator name;
- Contact information;
- MODU/facility/platform name;
- Initial date and time; and
- How you are providing GPS real-time data access.

BSEE GOMR COOP Office contact information

To speak with someone in the BSSE GOMR, COOP Office please call either (504) 736-5793 or (504) 736-5794.

Guidance Document Statement

BSEE issues NTLs as guidance documents in accordance with 30 CFR 250.103 to clarify and provide more detail about certain requirements and to outline the information you must provide in your various submittals. This NTL sets forth a policy on and an interpretation of requirements and provides a clear and consistent approach to complying with those requirements. This NTL also identifies measures that constitute BAST under 30 CFR 250.107(d). If you wish to use an alternative approach for compliance, you may do so, after you receive approval from the appropriate BSEE office under 30 CFR 250.141.

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 BSEE collects this information to carry out its responsibilities under the OCS Lands Act, as amended. BSEE will use the information to find and locate MODUs that are off location and to determine if other facilities/pipelines are in their paths. Responses are required to obtain or retain a benefit. No proprietary data are collected. 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 the collection of information pertaining to this collection of information under 1014-0013; 30 CFR 250, subpart A. We estimate the annual reporting burden pertaining to this NTL to be 1 hour (rounded) per response and the non-hour cost burden to total \$102,500. Direct any comments regarding the burden estimate or any other aspect of this collection of information to the Information Collection Clearance Officer, Bureau of Safety and Environmental Enforcement, 381 Elden Street, Herndon, VA 20170.

Contact

If you have any questions regarding this NTL, please contact District Operations Support, (504)736-2433.

Lars Herbst
Regional Director