

**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
GULF OF MEXICO OUTER CONTINENTAL SHELF REGION**

BSEE NTL No. 2013-G03

Effective Date: August 8, 2013

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

Pollution Inspection Intervals for Unmanned Facilities

Purpose

This Notice to Lessees and Operators (NTL) supersedes NTL No. 2008-G03, dated April 14, 2008. It clarifies current policy by describing how District Managers will determine the appropriate intervals for the pollution inspection you conduct for unmanned facilities and by explaining that you may conduct some of these inspections “visually” instead of by physically boarding the facility.

Authority

According to 30 CFR 250.301, you must inspect production facilities daily or at intervals approved or prescribed by the District Manager to determine if pollution is occurring. Under this authority, the appropriate Gulf of Mexico OCS Region (GOMR) District Manager will use the following point system matrix and evaluation code to determine the pollution inspection interval for an individual unmanned facility.

Pollution Inspection Matrix

VALUE	10 Points	20 Points	30 Points	40 Points	50 Points
Distance of facility to nearby manned platforms	<1 mile	1-2 miles	3-5 miles	6-20 miles	>20 miles
Distance of facility to shoreline or sensitive area	>60 miles	31-60 miles	21-30 miles	10-20 miles	<10 miles
Capacity of hydrocarbon storage tanks on facility	<20 bbls	20-75 bbls	76-100 bbls	101-125 bbls	>125 bbls
General direction of currents	Away from shoreline	_____	Parallel to shoreline	_____	Towards shoreline
Supervisory Control And Data Acquisition (SCADA) or other continuous monitoring	All operating conditions; shut-in (SI) capability	Pressures, levels, etc.; no SI capability	Pressures only	_____	Not monitoring anything

VALUE	10 Points	20 Points	30 Points	40 Points	50 Points
Product	Dry gas or <10 Barrels of Condensate per Day (BCPD) or <10 barrels of oil per day (BOPD)	Gas and <100 BCPD	Gas and >100 BCPD	Gas and <100 BOPD	>100 BOPD or >20 parts per million (ppm) Hydrogen Sulfide (H ₂ S)
One or more pollution incidents cumulatively >1 bbl in the 2 years before the request date	No pollution incidents cumulatively >1 bbl	One or more pollution incidents cumulatively >1 bbl is 200 points			

Evaluation Code

Points	Inspection Interval	Physical Boarding Inspection Interval
70-100	Bi-weekly	Bi-weekly
110-150	Weekly	Weekly
160-200	Every three days	Weekly
210-250	Every other day	Weekly
260+	Daily	Weekly

Exceptions

1. The BSEE GOMR will not approve an increase in the prescribed daily pollution inspection interval until production has been established on the facility for a period of 7 days for a minor platform and 30 days for a major platform. For purposes of this NTL, a **major** platform is a structure with either six or more completions or zero to five completions with more than one item of production process equipment. A **minor** platform is a structure with zero to five completions with one item of production process equipment.

2. When all of the wells on an unmanned facility (a) are disconnected from production facilities and blind flanged; (b) are equipped with a tubing plug; or (c) have their master valves locked closed, and you have drained the hydrocarbons from all of the tanks and vessels, the appropriate GOMR District Manager may approve a pollution inspection interval of up to 1 month. Perform this monthly inspection by physically boarding the facility.

3. The appropriate GOMR District Manager will not approve an increase in the prescribed daily pollution inspection interval if your facility is producing, processing, or has the capacity of storing more than 400 barrels of liquid hydrocarbons per day.

4. The appropriate GOMR District Manager may rescind an approval for an increase in the prescribed daily pollution inspection interval if a pollution incident involving a spill greater than one barrel subsequently occurs at the facility.

5. When you perform a “physical boarding” inspection, ensure that you inspect each deck of the facility with an emphasis on major components. Indicate the date of each “physical boarding” inspection in your records.

6. For “visual” inspections, fly-over inspections are acceptable provided the personnel on the aircraft can identify evidence of pollution on the surface of the water. Visual inspections utilizing binoculars to see from one platform to another are not acceptable.

7. If there is a substantial change in the conditions under which the GOMR District Manager approved an increase in the prescribed daily pollution inspection interval, the GOMR District Manager may withdraw approval of the increase.

Guidance Document Statement

The BSEE GOMR issues NTLs as guidance documents in accordance with 30 CFR 250.103 to clarify or provide more detail about certain BSEE regulatory requirements and to outline the information you must provide in your various submittals. Under that authority, this NTL sets forth a policy on and an interpretation of a regulatory requirement that provide a clear and consistent approach to complying with that requirement. However, if you wish to use an alternative approach for compliance, you may do so, after you receive approval from the appropriate BSEE GOMR office under the terms set forth in 30 CFR 250.141.

Paperwork Reduction Act of 1995 Statement

The information collection referred to in this NTL provides clarification, description, or interpretation of requirements contained in 30 CFR 250, Subpart C. The Office of Management and Budget (OMB) approved the information collection requirements for this regulation and assigned OMB Control Number 1014-0023. This NTL does not impose any additional information collection requirements subject to the Paperwork Reduction Act of 1995.

Contacts

If you have any questions regarding this NTL, please contact the Production Engineer in the appropriate GOMR District Office.



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Regional Director