

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

NTL No. 2008-G10

Effective Date: June 1, 2008
Expiration Date: December 1, 2013

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) provides 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, and Rita during the 2004 and 2005 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, nine 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. Guidelines for improved moored MODU station-keeping are addressed in a separate NTL.

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 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), contact the appropriate GOMR District Manager to determine if you need to submit additional information concerning the jack-up rig's capability to operate at the proposed location.

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.

Make sure that the information you provide in your APD's and APM's to comply with 30 CFR 250.417(a) includes the following:

1. A statement documenting that you have provided or will provide appropriate bottom survey data (shallow hazards survey and/or bottom Mesotech scan) to the rig contractor to allow the best location for the rig to be established prior to moving on location.
2. A statement documenting that you have provided or will provide appropriate geotechnical data (sufficient to determine soil characteristics over depth and foundation strength of the proposed location) to the rig contractor prior to moving on location to facilitate adequate assessment of the foundation prior to preloading operations.
3. A statement documenting that you have provided or will provide site-specific metocean data (using the criteria in Appendix C of API RP 95J), including winds, waves, currents, storm surge, and tides, to the rig contractor prior to moving the rig on location to facilitate proper positioning of the rig on location and determine the appropriate air gap. In lieu of site specific data, the MMS GOMR will also accept the use of the more conservative generic data depicted in Appendix D of API RP 95J.

4. The rig contractor's anticipated preloading procedures and holding times that are proposed to minimize the potential for further settlement from potential hurricane loading.
5. The rig contractor's information on how the air gap determination was made for the site-specific location. The MMS GOMR will accept a site-specific 100-year hurricane wave crest elevation (using available metocean data from 1950 to the present) with the addition of (a) a wave crest uncertainty allowance of 3 to 5 percent and (b) a settling allowance for the given rig type and soil characteristics and the expected hurricane loading (see item no. 3 above relative to metocean data). As an alternative, the MMS GOMR will accept the more conservative air gap curve depicted in Appendix "A" of API RP 95J.
6. Your plans for supporting and securing the well prior to evacuation. In addition to complying with the MMS requirement for all drilling wells to be properly secured prior to evacuation (30 CFR 250.402), set the storm packer at a depth sufficiently below the mudline to ensure that wellbore integrity is not compromised should failure of the drive pipe/conductor pipe occur.
7. Any additional information that would mitigate or otherwise alter these jack-up rig fitness requirements during hurricane season.

The MMS GOMR encourages you to

1. Provide the United States Coast Guard with read-only access to the Emergency Position Indication Radiobeacon (EPIRB) data for your jack-up rig fleet before hurricane season begins; and
2. Review and update your Coast Guard Marine Operations Manual to minimize the possibility of adverse consequences of any tropical system.

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 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 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 the Drilling Engineer in the respective MMS GOMR District Office, as listed below:

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