

Cancellation of OCS policy on life extension requirements for floating OCS facilities

POSTED BY LT AMY MIDGETT ON AUGUST 23, 2019

From the desk of the Capt. Russell Holmes, Eighth District Outer Continental Shelf Officer in Charge, Marine Inspections

The Coast Guard Eighth District Outer Continental Shelf OCMI (<https://www.atlanticarea.uscg.mil/D8/OCS/>) staff has been continuing to strengthen our joint regulatory oversight and compliance schemes with the Bureau of Safety and Environmental Enforcement (BSEE) (<https://www.bsee.gov/>) to ensure a consistent approach to the OCS oil and gas industry. The Coast Guard Eighth District response and planning staffs, as well as Sector New Orleans, have also been doing the same for oil spill preparedness and pollution response.

Life extensions: In response to one of the recommendations in the National Offshore Safety Advisory Committee Production Subcommittee Final Report, dated March 28, 2018 (<https://homeport.uscg.mil/Lists/Content/Attachments/22208/NOSAC.Production.RegReform.Sep2018.FINAL.signed.pdf>), we finalized discussions between Coast Guard Marine Safety Center (<https://www.dco.uscg.mil/Our-Organization/Assistant-Commandant-for-Prevention-Policy-CG-5P/Commercial-Regulations-standards-CG-5PS/Marine-Safety-Center-MSC/>), D8 OCS OCMI staff, OCS National Center of Expertise (<https://www.dco.uscg.mil/OCSNCOE/>) (NCOE) staff and BSEE leaders to clarify, streamline and eliminate redundancies between our two agencies related to evaluating service life extension requests. These submissions are used to determine if an oil and gas floating OCS facility is suitable to remain on site and operate beyond its initial permitted design life. As a result of those discussions, industry no longer needs to submit service life extension requests to the Coast Guard as previously outlined in D8 Policy Letter 01-2016 (<https://www.dco.uscg.mil/OCSNCOE/Regulations-Policy-Guidance/FOF/#FOF%20Part%204>). BSEE will be the primary recipient for these requests and the Coast Guard will assist BSEE's review on a case by case basis.

Structures: In the coming months we will have a follow-on joint discussion related to structural modifications, repair proposals, and in-service inspection plans and could potentially revise industry submissions on these topics as well.

Investigations: In the past couple of months, both agencies have been working together on three marine casualty incidents that resulted in the loss of four personnel. One investigation is being led by Coast Guard and the other two are being led by BSEE.

Finally, earlier this spring, OCS inspectors, OCS NCOE and BSEE Office of Structural and Technical Support personnel traveled offshore together to inspect the fitness of a Tension Leg Platform's tendon tension monitoring system (TTMS). This case was particularly noteworthy as it was the first time Coast Guard and BSEE structural staff responded jointly offshore to a reported TTMS concern. The case also highlighted the joint jurisdiction the Coast Guard and BSEE share related to the stability of these facilities and our ability to leverage each organization's authorities to jointly gain compliance.

These are just a few tactical examples to highlight the continued growth of the interagency relationship between the Coast Guard and BSEE's regional and district staffs to provide regulatory oversight and support for offshore safety while facilitating commerce.



Members of the joint service life extension working group, from left to right: Bimal Shrestha, Pipelines, BSEE; Otho Barnes, TAS Chief, BSEE; USCG Lt. Cmdr. Mike Metz; Allison Monetta, TAS, BSEE; USCG Lt. Cmdr. Lisa Woodman; Marilyn Sauls, OSTs, BSEE; Paul Versowsky, OSTs Chief, BSEE; USCG Lt. Cmdr. Mickey Dougherty; Ed Lacy, USCG; Digvijay Singh, USCG.

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