

**Rigs-to-Reefs Policy Addendum: *Enhanced
Reviewing and Approval Guidelines in Response to
the Post-Hurricane Katrina Regulatory Environment***

Related Document

Rigs-to-Reefs Policy, Progress, and Perspective (OCS Report MMS 2000-073)

**U.S. Department of the Interior
Minerals Management Service
Gulf of Mexico OCS Region**

**New Orleans
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Addendum Summary

This document was developed to provide additional information on the Minerals Management Service, Gulf of Mexico OCS Region's (MMS GOMR's) Rigs-to-Reefs Policy and the reviewing and procedural components that have been enhanced to address several variations observed in reefing proposals received after, and as a result of, the 2005 Storm Season. The information discussed below is primarily meant to effect better State and Federal agency coordination and improve industry planning regarding their decommissioning programs. This document is not intended to replace the current Rigs-to-Reefs policy document, *Rigs-to-Reefs Policy, Progress, and Perspective* (OCS Report MMS 2000-073), but to be a flexible supplement that allows for concurrent documentation and sound adaptive management.

Originating Office

Office of Field Operations/Office of Leasing and Environment, Gulf of Mexico OCS Region, Offshore Energy and Minerals Management

Purpose

The purpose of the MMS GOMR's Rigs-to-Reefs Policy is to evaluate platform-removal applications seeking an alternative to onshore disposal through the approval of tow-and-place, topple-in-place, and partial removal-in-place of platforms or facilities for conversion to an artificial reef.

Objective

The objective of this Addendum is to outline GOMR's policy, reviewing standards, and procedural framework for the effective coordination and approval of documentation submitted to MMS by industry to tow-and-place, topple-in-place, and partial removal-in-place of platforms for conversion to an artificial reef. The objective of this Addendum is not to outline processes and procedures that would normally be covered under Standard Operating Procedures.

Authority

- A. Outer Continental Shelf Lands Act and amendments (OCSLA, 43 U.S.C. §1331 et seq.);
- B. National Environmental Policy Act (NEPA) of 1969 (42.U.S.C. §4321-4347).

References

- A. Regulations: Oil and Gas and Sulphur Operations in the Outer Continental Shelf (30 CFR Part 250 Subpart Q – Decommissioning Activities (§§ 250.1700-1754));
- B. *Rigs-to-Reefs Policy, Progress, and Perspective*; OCS Report MMS 2000-073, New Orleans, October 2000;
- C. National Fishing Enhancement Act of 1984 (33 U.S.C. §2101 et seq.);
- D. National Artificial Reef Plan: Guidelines for Siting, Construction, Development, and Assessment of Artificial Reefs; United States Department of Commerce, National Oceanic and Atmospheric Administration, February 2007; and
- E. National Guidance: Best Management Practices for Preparing Vessels Intended to Create Artificial Reefs; United States Environmental Protection Agency and United States Maritime Administration, May 2006.

Policy

It is the policy of MMS that

- A. The MMS supports and encourages the reuse of obsolete oil and gas facilities as artificial reefs and will grant a lessee/operator a departure from removal requirements under 30 CFR §250.1725(a) and applicable lease obligations provided that
 1. The structure becomes part of a State artificial reef program that complies with the criteria in the National Artificial Reef Plan;
 2. The responsible State agency acquires a permit from the U.S. Army Corps of Engineers and accepts title and liability for the reefed structure once removal/reefing operations are concluded;
 3. The operator satisfies any U.S. Coast Guard navigational requirements for the structure; and
 4. The reefing proposal complies with Regional Engineering, Stability, and Environmental Reviewing Standards and Reef-Approval Guidelines.
- B. Engineering, Stability, and Environmental Reviewing Standards: The MMS GOMR will review each decommissioning application proposing Rigs-to-Reef to ensure that problematic engineering and/or environmental uncertainties are eliminated and the MMS Rigs-to-Reefs Policy does not give the impression of a disposal program. The following set of standards will apply:
 1. Reef material must be stable and not endanger nearby infrastructure and/or protected resources:
 - a. No debris piles, debris fields, or reef baskets will be allowed under OCSLA regulatory permitting;
 - b. Reef sites will not be permitted in areas of seafloor instability or known mudslide activity;
 - c. Reef material must be established in the most stable orientation in its final disposition;
 2. Reef sites must be free from all potentially hazardous/nonstructural material:
 - a. Standing Decks – all nonstructural components must be removed (i.e., equipment, vessels, piping/tubing, wiring, etc.) and a facility inspection must be conducted/documented by MMS or a third-party prior to reefing;
 - b. Submerged Decks – all decks and their separated components/equipment must be removed;
 3. Reef sites must not hinder future OCSLA oil and gas, marine mineral, and/or renewable energy/alternative activity operations:
 - a. Future reef sites will not be allowed within 5 miles of established/pending reef locations to minimize the impact to future pipeline operations;
 - b. Future reef sites will be reviewed for impact to future resource extraction (e.g., oil, gas, sulphur, and sand resources);
 4. Reef sites must not lead to avoidable space-use conflicts with other users of the GOM OCS:
 - a. Some proposals may require public review/commenting periods under NEPA (primarily a concern for abandonment-in-place); and
 - b. Reef sites that fall within the administrative/Coastal Zone Management Act boundary of another state could require coordination/consistency review by both applicable agencies.
- C. Reef-Approval Guidelines: Pending additional policy coordination between necessary State and Federal agencies and the opportunity for public participation, MMS GOMR will only grant Rigs-to-Reef departures for platform-removal applications proposing the structure's siting within any
 1. New reef sites within the existing Texas General Reef Permit Area, Louisiana Artificial Reef Planning Areas, or Mississippi Artificial Reef Development Zone 4;
 2. Existing/established artificial reef sites (i.e., previously reviewed and approved by MMS GOMR) both within and outside of the areas previously mentioned in Section 5.C.1; and
 3. Platform-removal permit applications with Rigs-to-Reef proposals received prior to implementation will be exempt from the Reef-Approval Guidelines; however, they will be subject to the applicable Engineering, Stability, and Environmental Reviewing Standards noted above.

Responsibilities

- A. Regional Director, Gulf of Mexico OCS Region (RD) is responsible for establishing and providing Regional policy and guidance concerning platform-removal applications and Rigs-to-Reefs Policy.
- B. Regional Supervisor, Office of Field Operations (RSFO) is responsible for processing removal applications proposing Rigs-to-Reefs and the associated technical review, as well as issuing the decision to approve/disapprove the resultant permit.
- C. Regional Supervisor, Office of Leasing and Environment (RSLE) is responsible for oversight and coordination subject to the Regional Rigs-to-Reefs Policy and the environmental review of platform-removal applications proposing Rigs-to-Reefs, as well as issuing the required NEPA documents in support of the decision to approve/disapprove the requested permit.

Reporting Requirements

All information related to platform-removal permit applications proposing Rigs-to-Reefs will be saved in the Technical Information Management System (TIMS) for reference and support of the Administrative Record. A report summarizing the number and type of platform-removal permits approved with waivers granted for Rigs-to-Reefs will be prepared annually by the Environmental Compliance Section and presented to the RD, RSFO, and RSLE.

Contacts

Please contact the following individuals for additional information related to

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Updates/Cancellation

This Addendum will remain in effect until updated/superseded by another Addendum document or cancelled by a revision to the primary policy document.