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(ocs)

16711/OCS D8(ocs) Policy Ltr 01-2015 14 Sep 2015

**MEMORANDUM** 

From: J. D. REYNOLDS, CAPT

D8 OCS OCMI

To: Distribution

Subj: OUTER CONTINENTAL SHELF (OCS) EMERGENCY EVACUATION PLAN

(EEP) APPROVALS

Ref: (a) Title 33, Code of Federal Regulations (CFR) Part 146.140(c)

(b) Title 33, Code of Federal Regulations (CFR) Part 146.210 (c) Title 33, Code of Federal Regulations (CFR) Parts 140.15(a)

(d) Marine Safety Manual Volume II, COMDTINST M16000.7B, Section G, Chapter 2, paragraph N, "Review of EEPs"

Reply to

Attn of:

- 1. **PURPOSE**: This policy letter is issued to improve efficiency and timeliness of Eighth District OCS Officer in Charge, Marine inspection (D8 OCS OCMI) review and approval of EEPs. The requirements for EEP approvals are outlined in reference (a) for manned OCS facilities and reference (b) for Mobile Offshore Drilling Units (MODUs). This policy reduces required resubmissions of EEPs for MODUs because of relocation in the Gulf of Mexico.
- 2. <u>BACKGROUND</u>: The consolidation of OCS OCMI responsibility to the D8 OCS OCMI channeled all EEP reviews to this office effective May 1, 2015. Our review of EEP submittals revealed the majority of EEPs were previously approved and resubmitted only because a MODU relocated to another lease block in the Gulf of Mexico. These re-submittals were to satisfy the prescriptive requirement of reference (a), contained no change in evacuation procedures, and required no administrative correction from this office. These re-submittals result in delayed approval times for initial EEP submittals and re-submittals of EEPs with substantial changes in evacuation procedures.

## 3. POLICY:

a. Under the equivalency provisions of reference (c) described in reference (d), the D8 OCS OCMI no longer requires re-submittals of previously approved MODU EEPs solely due to relocation in the Gulf of Mexico. The D8 OCS OCMI will continue to require submittals of EEPs for OCS facilities and MODUs new to the Gulf of Mexico

## Subj: OUTER CONTINENTAL SHELF (OCS) EMERGENCY EVACUATION PLAN (EEP) APPROVALS

and EEP re-submittals due to substantial changes to previously approved EEPs, other than MODU relocations, described in reference (a).

- b. EEPs will continue to be checked in the normal course of facility and MODU inspections to ensure the evacuation procedures/times are effective/accurate and the crew is proficient in EEP procedures. Inspectors may issue deficiencies and/or require EEP resubmission if this criteria is not met.
- c. Operators are reminded to submit EEPs for review via email to <a href="mailto:emergency-evacuation-plans@uscg.mil">emergency-evacuation-plans@uscg.mil</a>. The sender will receive a reply (not automatic) acknowledging receipt along with an EEP serial number. Please reference this serial number in subsequent correspondence.
- d. This office will continue to use the checklist in enclosure (1) for reviewing EEPs.
- e. Nothing in this policy is intended to limit the authority of the D8 OCS OCMI to require additional actions if deemed necessary.
- 4. **POINT OF CONTACT**: Questions regarding this policy may be directed to the Eighth District OCS staff at (504) 671-2268.

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Encl: (1) EEP Checklist – D8 OCS OCMI

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Copy: Offshore Operators Committee

International Association of Drilling Contractors

## EEP Checklist - D8 OCS OCMI

The EEP must, at a minimum, \_(1) Be written in language that is easily understood by the facility's operating personnel; \_\_\_\_(2) Have a table of contents and general index; \_\_\_\_(3) Have a record of changes; \_(4) List the name, telephone number, and function of each person to be contacted under the EEP and state the circumstances in which that person should be contacted; (5) List the facility's communications equipment, its available frequencies, and the communications schedules with shore installations, standby vessels, rescue aircraft, and other OCS facilities specified in the EEP; \_\_(6) Identify the primary source of weather forecasting relied upon in implementing the EEP and state the frequency of reports when normal weather is forecasted, the frequency of reports when heavy weather is forecasted, and the method of transmitting the reports to the facility; \_(7) Designate the individual on each facility covered by the EEP who is assigned primary responsibility for implementing the EEP; \_(8) Designate those facility and shoreside support personnel who have the authority to advise the person in charge of the facility as to the best course of action to be taken and who initiate actions to assist facility personnel; \_\_\_(9) Describe the recognized circumstances, such as fires or blowouts, and environmental conditions, such as approaching hurricanes or ice floes, in which the facility or its personnel would be placed in jeopardy and a mass evacuation of the facility's personnel would be recommended; \_\_(10) For each of the circumstances and conditions described under paragraph(9) of this checklist, list the pre-evacuation steps for securing operations, whether drilling or production, including the time estimates for completion and the personnel required; \_(11) For each of the circumstances and conditions described under paragraph (9) of this checklist, describe the order in which personnel would be evacuated, the transportation resources to be used in the evacuation, the operational limitations for each mode of transportation specified, and the time and distance factors for initiating the evacuation; and (12) For each of the circumstances and conditions described under paragraph(9) of this checklist, identify the means and procedures-

(i) For retrieving persons from the water during an evacuation;

- (ii) For transferring persons from the facility to designated standby vessels, lifeboats, or other types of evacuation craft;
- (iii) For retrieving persons from designated standby vessels, lifeboats, or other types of evacuation craft if used; and
- (iv) For the ultimate evacuation of all persons on the facility to land, another facility, or other location where the evacuees would be reasonably out of danger under the circumstance or condition being addressed.