

Shell Exploration & Production Company



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May 28, 2002

Department of the Interior
Minerals Management Service
381 Elden Street; Mail Stop 4024
Herndon, Virginia 20170-4817
Attention: Rules Processing Team.

**RE: FR 66851 – 66865; December 27, 2001
OCS Fixed and Floating Platforms and
Documents Incorporated by Reference**

Gentlemen;

Shell Exploration & Production Company and other affiliates of Shell Oil Company (all referred to as "Shell") appreciates the opportunity to comment on the Notice of Proposed Rulemaking for OCS Fixed and Floating Platforms and Documents Incorporated by Reference. Being actively involved in oil and natural gas development projects, Shell is very interested in the proposed regulations.

Shell supports the comments that have been submitted by the Offshore Operators Committee. Shell actively participates in this industry committee, and has contributed to the development of the comments that they have submitted regarding this proposed rulemaking.

Shell has also submitted comments under separate cover letter dated May 23, 2002.

If you have any questions or need further clarification, please do not hesitate to call me, or Rick Meyer at (504) 728-6393.

Very truly yours,

R. B. Meyer, P.E., for

Peter K. Velez
Manager, Regulatory Affairs, Operations HSE, and Incident Command

Rec 5/29/02

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Shell supports MMS's proposal to incorporate the noted Industry Standards. Shell believes that appropriate industry consensus standards should be adopted wherever possible. We would like to note that some of the proposed standards are currently being worked by industry committees to address design and other differences between U.S. OCS deepwater platforms, and platforms located in shallow water. MMS should work closely with these committees so that the revised standards may also be readily adopted into the MMS regulations.

Other Shell comments are attached.

If you have any questions or need further clarification, please do not hesitate to call me, or Rick Meyer at (504) 728-6393.

Very truly yours,

A handwritten signature in cursive script that reads "Peter Velez".

Peter K. Velez
Manager, Regulatory Affairs, Operations HSE, and Incident Command

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Section	Proposed Language or Requirement	Comment
Changes to Subpart H, Production Systems		
250.800(b)	For all new floating production systems (FPSs) (e.g., column-stabilized units (CSUs); floating production, storage and offloading facilities (FPSOs); tension-leg platforms (TLPs); spars, etc.), you, the lessee, must do all of the following:	1. How is “new” defined? It should be realized that in many cases there is a long lead-time between the initial design of the a platform, facilities, mooring and risers and fabrication and installation. All floating platforms currently in either the late stages of design or being fabricated may not fully comply with all of the proposed regulations. This comment is applicable to other parts of the proposed regulation where “new” is utilized.
250.803(b)(2)(iii)	If you are installing flowlines constructed of unbonded flexible pipe on a floating platform, you must comply with the requirements of API Spec 17J, including its third-party review standards for independent verification agents (IVAs). You must submit your IVA reviews for flowlines constructed of unbonded flexible pipe for review by the MMS District Supervisor.	1. When does the third party review of unbonded flexible pipe flowlines have to be submitted to MMS? What is MMS going to do with the IVA review? Does the review have to be approved by MMS?
Changes to Subpart I, Fixed and Floating Structures		
250.901	What industry standards must fixed and floating platforms meet?	

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Section	Proposed Language or Requirement	Comment
250.901(a)	<p>In addition to the other requirements of this subpart, your plans for fixed or floating platform design, analysis, fabrication, and installation must, as appropriate, conform to:</p> <p>(1) American Concrete Institute (ACI) Standard 318, Building Code Requirements for Reinforced Concrete, plus Commentary.</p> <p>(2) ACI 357R, Guide for the Design and Construction of Fixed Offshore Concrete Structures;</p> <p>(3) American Institute of Steel Construction (AISC) Standard Specification for Structural Steel Buildings, Allowable Stress Design and Plastic Design;</p> <p>(4) American Petroleum Institute (API) Recommended Practice (RP) 2A, Recommended Practice for Planning, Designing, and Constructing Fixed Offshore Platforms;</p> <p>(5) API RP 2FPS, Recommended Practice for Planning, Designing, and Constructing Floating Production Systems;</p> <p>(6) API RP 2RD, Design of Risers for Floating Production Systems (FPSs) and Tension-Leg Platforms (TLPs);</p> <p>(7) API RP 2SK, Recommended Practice for Design and Analysis of Station Keeping Systems for Floating Structures;</p> <p>(8) API RP 2SM, Recommended Practice for Design, Manufacture, Installation, and Maintenance of Synthetic Fiber Ropes for Offshore Mooring;</p> <p>(9) API RP 2T, Recommended Practice for Planning, Designing and Constructing Tension Leg Platforms;</p> <p>(10) API RP 14J, Recommended Practice for Design and Hazards Analysis for Offshore Production Facilities;</p> <p>(11) American Society for Testing and Materials (ASTM) Standard C 33-99a, Standard Specification for Concrete Aggregates;</p> <p>(12) ASTM Standard C 94/C 94M-99, Standard Specification for Ready-Mixed Concrete;</p> <p>(13) ASTM Standard C 150-99, Standard Specification for Portland Cement;</p> <p>(14) ASTM Standard C 330-99, Standard Specification for Lightweight Aggregates for Structural Concrete;</p> <p>(15) ASTM Standard C 595-98, Standard Specification for Blended Hydraulic Cements;</p> <p>(16) AWS D1.1, Structural Welding Code--Steel;</p> <p>(17) AWS D1.4, Structural Welding Code--Reinforcing Steel;</p> <p>(18) AWS D3.6M, Specification for Underwater Welding;</p> <p>(19) NACE Standard MR0175, Sulfide Stress Cracking Resistant Metallic Materials for Oilfield Equipment;</p> <p>and</p>	<p>1. In lieu of listing the standards for fixed and floating platforms together, it would be clearer if three lists were given: 1. fixed only, 2. floating only and 3. fixed and floating. This would eliminate confusion on the applicability of standards such as 14J, which only new floating platforms have to meet.</p> <p>2. A number of these recommended practices and standards are in the process of being revised to address deepwater facility requirements. MMS should stay up-to-date, and where possible participate, in the revision of these recommended practices and standards, so that new editions of the recommended practices or standards can be readily adopted into the MMS regulations.</p> <p>3. In addition, MMS should consider the adoption of API RP 2I, In-service inspection of hardware for FDU.</p> <p>4. In the current MOU between MMS and USCG, the agencies have joint jurisdiction over the structural design on non-ship shaped hulls. USCG treats floating production platforms as MODUs. In 46 CFR 108.113, USCG requires each unit to meet the structural standards of the American Bureau of Shipping "Rules for Building and Classing Offshore Mobile Drilling Units". There is concern that there could be conflicts between the recommended practices and standards proposed for adoption in this rulemaking and the USCG structural requirements. Industry has not undergone an exhaustive study to determine if conflicts exist. Further, it is confusing to industry to have the joint jurisdiction over the same system, especially when the criteria is different. It is suggested that MMS and USCG work together and either adopt the same criteria for systems in which they have joint jurisdiction or that one agency clearly be given the lead jurisdiction for each system and move away from the joint jurisdiction where both agencies have to approve a system.</p>

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Section	Proposed Language or Requirement	Comment
250.901(a) (cont'd)	(cont'd) (20) NACE Standard RP 01-76-94, Standard Recommended Practice, Corrosion Control of Steel Fixed Offshore Platforms Associated with Petroleum Production.	
250.901(b)	You must follow the requirements contained in the documents listed under paragraph (a) of this section insofar as they do not conflict with other provisions of 30 CFR part 250. You may use applicable provisions of these documents, as approved by the Regional Supervisor, for the design, fabrication, and installation of platforms such as spars, since standards specifically written for such structures do not exist. You may also use alternative codes, rules, or standards, as approved by the Regional Supervisor, under the conditions enumerated in Sec. 250.141, paragraphs (a), (b), and (c) of this part.	1. If an operator chooses to Class his floating platform, the systems covered by Class should be allowed to be designed to Class rules without seeking specific approval from the Regional Supervisor.
250.902	What must an application to approve a fixed or floating platform contain?	

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Section	Proposed Language or Requirement			Comment
	<p>You must submit to the Regional Supervisor for approval all applications under this subpart and all significant changes or modifications to approved applications. Your application for all new fixed or floating platforms or major modifications must contain all of the following general facility information:</p>			<p>1. For platforms subject to the Platform Verification Process, the rationale for submitting a full application to MMS, including a complete set of structural drawings, etc, is unclear since the information will also be provided to the certification agency to verify the design. It would appear to be more appropriate to submit (a)(b)(c) and (j) to MMS with the rest of the information submitted to the CVA. In many instances all of the information required is not available at the time the application needs to be made for a floating platform in order to kick off the CVA program.</p> <p>2. The proposed regulations seem to assume that the design stages of a floating platform matches that for a fixed platform. For a fixed platform, the platform is fully designed and is then fabricated. For a floating platform, the design may be done in stages with fabrication commencing on various systems prior to the final design of other systems. This rule making does not seem to take this into account. We suggest that MMS investigate project sequencing and take that into account in the rulemaking.</p>
<p>Required documents</p>	<p>Required contents</p>	<p>Other requirements</p>		
<p>(a) Application cover letter</p>	<p>Proposed facility designation, lease number, area, name, and block number, and the type of facility (e.g., drilling, production, quarters)..</p>	<p>You must submit three copies*</p>		
<p>(b) Location plat</p>	<p>Latitude and longitude coordinates, Universal Mercator grid-system coordinates, state plane coordinates in the Lambert or Transverse Mercator Projection System, and distances in feet from nearest block lines.</p>	<p>Your plat must be drawn to a scale of 1 inch equals 2,000 feet and include the coordinates of the lease block boundary lines. You must submit three copies.*</p>		
<p>(c) Front, Side, and Plan View drawings.</p>	<p>Platform dimensions and orientation, elevations relative to M.S.L. and pile sizes and penetrations</p>	<p>Your drawing size must not exceed 11" X 17". You must submit three copies.*</p>		
<p>(d) Complete set structural drawings</p>		<p>Your drawing sizes must not exceed 11" X 17". You must submit one copy.</p>		
<p>(e) Summary of environmental data</p>	<p>A summary of the environmental data described in the standards referenced under 250.901(a) and in 250.198 of this part, where the data is used in the design or analysis of the platform. Examples of relevant data include information on waves, wind, current, tides, temperature, snow and ice effects, marine growth, and water depth</p>	<p>You must submit one copy.</p>		

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(cont'd)	(cont'd)			(cont'd) 3. Document (i) requires that an in-service inspection plan be submitted for both fixed and floating platforms with the application. In the MOU between the USCG and MMS, USCG has been given sole jurisdiction of structural inspection requirements for floating platforms, with the USCG copying MMS on approvals and compliance records. Industry is confused over the rationale for MMS to adopt In-service Inspection Requirements for floating platforms. MMS should coordinate any requirements for ISIP review and inspection oversight with the USCG, to eliminate a duplicate or parallel program. We also question the timing of the submittal of the inspection plan. Since the first inspection is normally not due for at least a year after installation, we recommend that any ISIP that is required to be submitted not be submitted with the platform application, but within 1 year after installation. Clarification is also needed on the in-service inspection agency jurisdiction for mooring and station keeping systems. 4. The Certification required in (j) "The design of this structure has been certified by a recognized classification society...." is stated as if the design at the time the application has been made has already been reviewed and approved. At the time the application is made, the design of a floating structure will NOT have been certified by a recognized classification society. We recommend that you restate the Certification to "The design of this structure <i>will be</i> certified".
	Required documents	Required contents	Other requirements	
	(f) Summary of the engineering design data.	Loading information (e.g., live, dead, environmental), structural information (e.g., design-life, material types, cathodic protection systems, design criteria fatigue life, fabrication and installation guidelines), and foundation information (e.g., soil stability, design criteria).	You must submit one copy.	
	(g) Project-specific	All studies pertinent to platform design or installation, e.g. soil and/or oceanographic reports.	You must submit one copy each study.	
	(h) Description of the loads imposed on the facility.	Loads imposed by production and pipeline risers and mooring and anchoring systems.	You must submit one copy.	
	(i) A copy of the inservice inspection plan.	This plan is described in 250.916	You must submit one copy.	
	(j) Certification	The following statement: "The design of this structure has been certified by a recognized classification society, or a registered civil or structural engineer, or equivalent, specializing in the design of offshore structures. The certified design and as-built plans and specifications will be on file at (give location)."	An authorized company must sign the registered statement. You must submit one copy.	
	* For your facilities subject to Platform Verification Program requirements in 250.903 through 250.912, you must submit one additional copy of these items (four copies total).			
250.903	Which of my platforms, associated structures and major modifications are subject to the Platform Verification Program?			

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Section	Proposed Language or Requirement	Comment
250.903	Which of my platforms, associated structures and major modifications are subject to the Platform Verification Program?	
250.903(a)	All new fixed or bottom-founded platforms that meet any of the following five conditions are subject to the Platform Verification Program: (1) Platforms installed in water depths exceeding 400 feet (122 meters); (2) Platforms having natural periods in excess of 3 seconds; (3) Platforms installed in areas of unstable bottom conditions; (4) Platforms having configurations and designs which have not previously been used or proven for use in the area; or (5) Platforms installed in seismically active areas.	1. If an operator chooses to Class the structure, the systems covered by Class should not be subject to the Verification program, rather the operator should be required to submit a Class certificate once it is issued following the installation of the structure.
250.903(c)	Platform Verification Program requirements apply to any major modification to a fixed or floating platform covered under this section.	1. What constitutes a major modification to a floating platform? Does it include such things as increased loading due to additional topsides equipment or loading from additional wells or risers?
250.904	If my platform, associated structure, or major modification is subject to the Platform Verification Program, what must I do?	
	If your platform, associated structure, or major modification meets the criteria in Sec. 250.903, you must:	
250.904(b)	Submit for the Regional Supervisor's approval three copies each of the design verification, fabrication verification, and installation verification plans required by Sec. 250.905; and	1. MMS should establish a time frame for approval following the submittal of the required plans.
250.905	What plans must I submit under the Platform Verification Program	
	If your platform, associated structure, or major modification meets the criteria in Sec. 250.903, you must submit all of the following plans required by this section:	

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250.905(a)	<p>Design verification plan. You may submit your design verification plan with or subsequent to the submittal of your Exploration Plan (EP) or Development and Production Plan (DPP). You may not submit your design verification plan before you submit your EP or DPP. Your design verification must be conducted by, or be under the direct supervision of, a registered professional civil or structural engineer or equivalent, with previous experience in directing the design of similar facilities, systems, structures, or equipment. Your design verification plan must include the following:</p> <p>(1) All design documentation specified in Sec. 250.902;</p> <p>(2) Abstracts of the computer programs used in the design process; and</p> <p>(3) A summary of the major design considerations and the approach to be used to verify the validity of these design considerations.</p>	<p>1. Naval architects should be included in the list of personal conducting the design verification.</p> <p>2. The design verification plan requirements are confusing. Normally, the operator submits the design documentation specified in (1), (2) and (3) directly to the CVA, not to MMS to give to the CVA. Is this a change in the program? Also, in most cases for a floating system, all the required information will not be given to the CVA at one time, but rather will be given to the CVA in a sequential manner as it is generated. It is recommended that MMS investigate the process used for the floating systems to date and modify the proposed rule accordingly.</p>
250.905(b)	<p>Fabrication verification plan. You must submit your fabrication verification plan to the Regional Supervisor, and the Regional Supervisor must approve your fabrication verification plan before you may initiate any related operations. Your fabrication verification plan must include the following:</p> <p>(1) Fabrication drawings and material specifications for artificial island structures and major members of concrete- and steel-gravity structures;</p> <p>(2) For jacket and floating structures, all the primary load-bearing members included in the space-frame analysis; and</p> <p>(3) A summary description of the following:</p> <p>(i) Structural tolerances;</p> <p>(ii) Welding procedures;</p> <p>(iii) Material (concrete, gravel, or silt) placement methods;</p> <p>(iv) Fabrication standards;</p> <p>(v) Material quality-control procedures;</p> <p>(vi) Methods and extent of nondestructive examinations for welds and materials; and</p> <p>(vii) Quality assurance procedures.</p>	<p>Again, this information is normally provided directly to the CVA by the operator. Is this meant to be a change in the program?</p>
250.910	What are the CVA's primary duties during the design phase?	

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250.910(d)	<p>The CVA, upon completion of the design verification, must prepare a final report which summarizes the material reviewed and the CVA's findings. The CVA must submit one copy of the report to the Regional Supervisor. The CVA must make this submittal within 6 weeks of the receipt of the design data or from the date the approval to act as a CVA was issued, whichever is later. The final report must include:</p> <p>(1) The CVA's recommendation that the Regional Supervisor either accept, request modifications, or reject the proposed design;</p> <p>(2) The particulars of how, by whom, and when the independent review was conducted; and</p> <p>(3) Any special comments the CVA may deem necessary.</p>	<p>1. The requirement to submit the design CVA reports within 6 weeks of receipt of the design data is too short a period. Recommend that the requirement be revised to within 90 days of the receipt of the design data, but at least prior to facility installation. Also, in many cases the complete design data is not provided to the CVA in one package; therefore, there should be some recognition of a phased approach. In all cases, the final report should be issued to MMS prior to installation.</p> <p>2. It should also be recognized that for floating systems, the CVA has been verifying the design to the USCG requirements since MMS had not established design requirements. It will take the CVA longer to verify the design to the new requirements. In the cases where the CVA is also approving the design for Class and/or USCG, they will also have to verify the design to those requirements.</p>
250.911	What are the CVA's primary duties during the fabrication phase?	
250.911(f)	<p>The CVA must prepare a final report covering the adequacy of the entire fabrication phase. The CVA is not required in the final report to cover aspects of the fabrication already included in interim reports. The CVA must submit one copy of the report to the Regional Supervisor immediately after completion of the fabrication of the fixed or floating platform. In the report the CVA must:</p> <p>(1) Give details of how, by whom, and when the independent monitoring activities were conducted;</p> <p>(2) Provide any special comments that the CVA deems necessary;</p> <p>(3) Describe the CVA's activities during the verification process;</p> <p>(4) Summarize the CVA's findings</p> <p>(5) Confirm or deny compliance with the design specifications and the approved fabrication plan; and</p> <p>(6) Make a recommendation to accept or reject the fabrication.</p>	<p>1. The requirement to submit the fabrication CVA reports immediately after completion of the fabrication is not really defined. Recommend that the requirement be revised to within 90 days of the completion of fabrication, but at least prior to facility installation.</p> <p>2. Please clarify if the fabrication CVA is expected to verify the center of gravity, etc. that is normally considered to be part of the USCG stability review and approval.</p>
250.912	What are the CVA's primary duties during the installation phase?	

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250.912(e)	<p>The CVA must prepare a final report covering the adequacy of the entire installation phase and submit one copy of the final report to the Regional Supervisor within 2 weeks of completion of the installation of the platform. In the report, the CVA must:</p> <ul style="list-style-type: none"> (1) Give details of how, by whom, and when the independent monitoring activities were conducted; (2) Provide any special comments that the CVA deems necessary; (3) Describe the CVA's activities during the verification process; (4) Summarize the CVA's findings; (5) Write a confirmation or denial of compliance with the approved installation plan; and (6) Provide recommendation to accept or reject the installation. 	<p>1. The requirement to submit the installation CVA reports within 2 weeks of completion of the installation is too short a period. Recommend that the requirement be revised to within 30 days of the completion of the facility installation.</p>
250.914	What records must I keep for all primary structural members?	
	<p>You must record and retain the origin and relevant material test results of all primary structural materials during all stages of construction. Primary material is material that, should it fail, it would lead to a significant reduction in platform safety, structural reliability, or operating capabilities. Items such as steel brackets, deck stiffeners and secondary braces or beams would not generally be considered primary structural members (or materials).</p>	<p>1. It is not clear where these records must be maintained. It is recommended that they be maintained either on the facility, or in the offices of the Operator.</p>
250.915	Where must I locate foundation boreholes?	

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Section	Proposed Language or Requirement	Comment
250.915(a)	For fixed or bottom-founded platforms and tension leg platforms, your maximum distance from any foundation pile to a soil boring must not exceed 500 feet.	<p>1. Spatial variability of soil properties on the continental shelf is much more of an issue than for deepwater sites. For jackets on the shelf, max. distance between borings of 500 ft is reasonable for deterministic designs with conventional safety factors. However, it is possible to have cases where multiple borings are spaced farther apart, but the uncertainty at the platform site may be explicitly quantified and specific safety factors developed accordingly.</p> <p>2. In lieu of the prescriptive requirement as proposed, the wording from ISO/DIS 19901-4 could be adopted: Geotechnical and Foundations Design Considerations. Results of previous integrated geoscience studies and experience at the site may enable the design and installation of additional structures without additional investigation. The onsite studies should extend throughout the depth and aerial extent of soils that will effect or be affected by installation of the foundation elements. The number and depth of borings and extent of soil testing will depend on the soil variability in the vicinity of the site, environmental design conditions (e.g. earthquake loading and slope instability) to be considered in the foundation design, the structure type and geometry, and the definition of geological hazards and constraints.</p> <p>3. For TLPs in deepwater, the industry practice is to conduct an integrated geotechnical/geology study of the site to assess spatial variability of soil stratigraphy and physical properties. Given the same depositional environment and geologic processes, practice has shown at several prominent deepwater basins that borings up to 10 miles apart do not produce appreciably different pile sizes considering the same load. Also, the uncertainty in soil properties at the platform site may be explicitly quantified and specific safety factors developed accordingly.</p>

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250.915(b)	For deepwater floating platforms which utilize catenary or taut-leg moorings, you must take borings at the most heavily loaded anchor location, at the anchor points approximately 120 and 240 degrees around the anchor pattern from that boring, and, as necessary, other points throughout the anchor pattern to establish the soil profile suitable for foundation design purposes.	1. Recognizing that deepwater developments with moored floaters and many subsea wells may cover a very large lateral extent (with the layout in a constant state of flux), an alternative site investigation strategy would be to base geotechnical data collection locations on the prevailing geology rather than specific facility locations. An integrated geotechnical/geology study of the development area is required for this methodology – i.e., stratigraphy must be known at any specific foundation location and uncertainties quantified. Specific safety factors may be developed accordingly.
250.916	What in-service inspection requirements must I meet?	
250.916(a)	You must develop an in-service inspection plan. As a minimum, your plan must fulfill the recommendations of the appropriate API documents listed in Sec. 250.901(a). Your plan must specify the type, extent, and frequency of in-place inspections which your contractor will conduct for both the above water and the under water structure of all platforms, and pertinent components of the mooring systems for floating platforms.	1. For floating facilities the In-Service Inspection Program (ISIP) duplicates the vessel inspection program already required and being done by the USCG. MMS should coordinate any requirements for ISIP review and inspection oversight with the USCG, to eliminate duplicate or parallel programs.
250.916(b)	You must submit a report annually on November 1 to the Regional Supervisor that must include : (1) A list of fixed or floating platforms inspected in the preceding 12 months; (2) The extent and area of inspection; (3) The type of inspection employed, i.e., visual, magnetic particle, ultrasonic testing; and (4) A summary of the testing results indicating what repairs, if any, were needed and the overall structural condition of the fixed or floating platform.	For floating facilities the In-Service Inspection Program (ISIP) duplicates the vessel inspection program already required and being done by the USCG. MMS should coordinate any requirements for ISIP review and inspection oversight with the USCG, to eliminate duplicate or parallel programs.
250.918	What records must I keep?	
	You must compile, retain, and make available to MMS representatives for the functional life of all fixed or floating platforms:	1. It is not clear where these records must be maintained. It is recommended that they be maintained either on the facility, or in the offices of the Operator.
Changes to Subpart J, Pipelines		
Sec. 250.1007	What to include in applications.	
250.1007(a)(4)	If your application involves using unbonded flexible pipe, you must include a review by a third-party IVA according to API Spec 17J.	1. It should be recognized that the third party review may not be available at the time the initial pipeline application is submitted. This requirement should be reworded to say that the third party review must be submitted prior to the pipeline application being approved.