



United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT

Gulf of America OCS Region
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

In Reply To: GE1033D

June 3, 2025

Ms. DeAnna Wayman
Manta Ray Gathering Company, L.L.C.
811 Louisiana Street, Suite 1200
Houston, Texas 77002
deanna.wayman@genlp.com

**RE: Life Extension – Right-of-way (ROW) Pipeline Risers
Green Canyon, 680, Constitution, CID-Str No. 1665-1
ROW Pipeline Segment No. 14841
ROW Pipeline Segment No. 14842
Authority: ROW No. OCS-G25461 & ROW No. OCS-G25462**

Dear Ms. Wayman:

The Bureau of Safety and Environmental Enforcement (BSEE) records indicate Manta Ray Gathering Company, L.L.C. is the pipeline Right-of-way (ROW) holder for one or more pipeline risers installed on the subject floating production system (FPS). On August 23, 2004, Enterprise Field Services, LLC submitted the initial applications for installation of the subject pipeline risers. The Minerals Management Service (MMS), BSEE's predecessor, approved the applications on January 31, 2005, and March 8, 2005. The BSEE-approved service life of the pipeline risers was set at 20 years from the initial hydrostatic pressure tests conducted on December 2, 2005, and December 17, 2005, because no initial CVA verification was performed, as the riser verification program was not established until 2007 under NTL No. 2007-G14.

Each listed ROW pipeline riser is beyond or within five years of reaching the end of the BSEE-approved service life. BSEE has identified ROW pipeline risers as critical components common to an FPS which may be most sensitive to continued service beyond their originally intended design service life (see NTL No. 2007-G14).

The regulation 30 CFR 250.900(a) in part, requires that "you must design, fabricate, install, use, maintain, inspect, and assess all platforms and related structures on the Outer Continental Shelf (OCS) so as to ensure their structural integrity for the safe conduct of drilling, workover, and production operations." An FPS and its component systems that have been properly designed, fabricated, installed, operated, monitored, inspected, and maintained may continue to be fit-for-service beyond their BSEE-approved service lives. However, when a facility approaches the end of its BSEE-approved service life, all critical components, including ROW pipeline risers, must be assessed to demonstrate that it is fit for continued service beyond that date.

You, as the current ROW holder, need to update (i.e., modify) your pipeline riser installation applications under 30 CFR 250.1000(b)(2) and 30 CFR 250.1007 to show that you will continue to meet the applicable requirements if the service life is extended, and you must obtain renewed approval

from BSEE for your installation application service life extension update. Your application must demonstrate that the pipeline risers are continuing to meet to the requirements of 30 CFR part 250, Subpart J and I, including the applicable industry standards in 30 CFR 198. Those industry standards include API RP 2RD, Design of Risers for Floating Production Systems (FPSs) and Tension-Leg Platforms (TLPs). See 30 CFR 250.198(e)(62), 30 CFR 250.901(a)(10), and 30 CFR 250.1002(b)(5). If you do not get the required approvals, BSEE may determine that continued operation of the pipeline risers beyond the approved service life is a violation of 30 CFR 250.107(a)(4), 30 CFR 250.910(b)(1)(i) and (2)(i).

Please contact the BSEE GOAR Section Chief for Pipelines, Ms. Angie Gobert, within 3 months from the date of this letter, to discuss the disposition of the identified ROW pipeline risers in terms of remaining service life and the path forward. If you do not plan on submitting a service life extension request for the pipeline risers, please be prepared to discuss a timeline for the submittal of the decommissioning applications for the ROW pipelines and risers.

Please be reminded that certain Life Extension activities may involve a joint review between the Pipeline and Hazardous Materials Safety Administration (PHMSA) and BSEE in accordance with the Memorandum of Understanding between the Department of the Interior and the Department of Transportation, Regarding Outer Continental Shelf Pipelines, dated December 2020.

Please direct any questions regarding this notification letter to Ms. Angie Gobert at (504) 736-2876 or pipelines@bsee.gov.

Sincerely,

**OTHO
BARNES**

Otho Barnes
Regional Supervisor
Regional Field Operations

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OTHO BARNES
Date: 2025.06.03
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Cc: Identified Operator, Manta Ray Gathering Company, L.L.C.: deanna.wayman@genlp.com