



OOO METER TIME EXTENSION REQUEST GUIDANCE DOCUMENT

ISSUE DATE: April 7, 2021 – Rev. 0

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1 Overview

The Bureau of Safety & Environmental Enforcement (BSEE) is responsible for the regulatory oversight of over 2,600 active royalty and allocation meters in the Gulf of Mexico Region. These meters are designated with a BSEE-assigned Facility Measurement Point (FMP) number. The requirements of maintaining these meters are described in the Code of Federal Registration (CFR), Part 250, Subpart L, as well as in NTL No. 2010 N-08 and in the BSEE-approved surface commingling and measurement permits. When a meter cannot be proved/ calibrated in the required timeframe, BSEE requires the operator to request a meter proving/calibration time extension. In certain circumstances, such as a force majeure event, a meter proving/calibration time extension request may not be required. This document provides guidance to operators as to when a meter proving/calibration time extension is required and when it is not required.

This document will also provide definitions and guidance specifically related to the BSEE Measurement Approval and Enforcement Section (MA&E), comprised of the Commingling and Measurement Approval Unit, Measurement Verification Unit, and Measurement Inspection Unit, including clarification of the different meter status classifications as described in NTL No. 2010 N-08, a description of different variance requests that can be submitted to BSEE, and clarification of time extension requirements for conducting well tests used for allocation purposes.

As of June 15, 2020, all requests to BSEE must be submitted through the Technical Information Management System (TIMS) Web portal which is an electronic interface designed to accept requests from operators. (<https://timsweb.bsee.gov/welcome.jsp>)



2 Meter / Tank Status Definitions (NTL No. 2010 N-08)

BSEE NTL No. 2010 N-08 provides detailed information regarding meter/tank status classifications and operator obligations with respect to meter proving/calibration and site security for each of these classifications. These classifications apply to meters being used for royalty or allocation measurement that have been designated an FMP Number in the BSEE TIMS database (see Note 1 for FMP Type Codes). Requests to change the status of a meter must be submitted under Surface Commingling and Measurement (SC&M) Requests in the TIMS Web portal. Requests for a meter proving/calibration time extension must be submitted under Measurement Verification (MV) in the TIMS Web portal (see Section 3 for details). The BSEE meter/tank status classifications are as follows:

A. Active

The status of a meter or royalty/inventory tank on a facility that is currently being utilized for royalty or allocation measurement. An Active meter can be classified as “operating” or “non-operating.”

An Active “operating” meter is a meter that is used for royalty or allocation measurement during a proving/calibration cycle and is required to be proved/calibrated as per the BSEE regulations. If an Active “operating” meter is unable to be proved/calibrated within the required timeframe, a proving/ calibration time extension must be requested by the operator. Copies of run tickets and gas volume statements must be submitted to the appropriate BSEE Regional office on a monthly basis for all Active “operating” meters used for royalty purposes.

An Active “non-operating” meter is an idle meter that is not used for royalty or allocation measurement during a proving/calibration cycle and does not need to be proved/calibrated for that cycle. Since an Active “non-operating” meter is not required to be proved/calibrated, a time extension request is not required for that cycle. An Active “non-operating” meter must be proved/calibrated upon being returned to service. While in Active status, a BSEE request to change between “operating” and “non-operating” status is not required. An Active “non-operating” meter may be removed from service for repairs without changing the status of the meter. The valves located upstream and downstream of an Active “non-operating” meter must be closed but do not need to be sealed. Copies of run tickets and gas volume statements indicating zero volume must be submitted to the appropriate BSEE Regional office on a monthly basis for all Active “non-operating” meters used for royalty purposes.

B. Inactive

The status of a meter or royalty/inventory tank associated with an Active FMP that is no longer being utilized for royalty or allocation measurement. A BSEE request to change the status of a meter or tank between Active and Inactive status is required. A meter/tank with an Inactive status must have all applicable measurement equipment installed and must be isolated by closing and subsequently sealing an individual valve located both upstream and downstream of the meter/tank. The seals must be numbered and recorded. Copies of run tickets and gas volume statements indicating zero volume are not required for Inactive meters. All meters returning to an Active status must be proved/calibrated upon being returned to service.

C. Terminated

The status of a previously approved royalty or allocation meter or royalty/inventory tank that has been either permanently removed from service and isolated with a skillet or spectacle blind or physically removed from a facility with the meter/tank connections blinded. A BSEE request to change the status of a meter or tank to Terminated is required.



Note 1: The first two numbers of an FMP No. indicate the measurement type.

- 01 - Royalty/Inventory Tank
- 20, 21 - Liquid hydrocarbon royalty meter
- 22, 24, 26 - Liquid hydrocarbon allocation meter
- 30, 31 - Gas royalty meter
- 32, 34 - Gas allocation meter
- 50 - Flare/vent gas meter

Note 2: The current status of all meters associated with an active FMP No. can be found in the BSEE Data Center (<https://www.data.bsee.gov/Production/FMPMetersTanks/Default.aspx>).



3 Variances

The term “Variance” is an umbrella term used by BSEE which includes alternate compliance, departure, and time extension requests. BSEE may approve an alternate compliance, departure, or time extension request as part of an SC&M submittal or an MV submittal in TIMS Web.

3.1 Alternate Compliance (referenced in 30 CFR 250.141)

Approvals can be granted by the appropriate BSEE representative for alternate procedures or equipment proposed by an operator which provide a level of safety and environmental protection that equals or surpasses current BSEE requirements. Currently the BSEE MA&E Section does not list any alternate compliance options in TIMS Web.

3.2 Departures (referenced in 30 CFR 250.142)

Approvals can be granted by the appropriate BSEE representative for departures from the operating requirements in the regulations.

Operators may select, but are not limited to, the following Departure types from a drop-down list in TIMS Web under the Variances tab as part of an SC&M submittal:

Table 1: Departure Types in TIMS Web under Variances tab

Permit Type	Regulation	Departure Description	Submittal Type
SC&M	30 CFR 250.1202(b)(1)(iii)	Liquid Hydrocarbon Royalty Meter Sampling	Surface Comm Application Request
SC&M	30 CFR 250.1202(d)(3)	Liquid Hydrocarbon Royalty Meter Proving Frequency	Surface Comm Application Request
SC&M	30 CFR 250.1202(k)(2)	Liquid Hydrocarbon Allocation Turbine Meter Sampling	Surface Comm Application Request
SC&M	30 CFR 250.1202(k)(3)	Liquid Hydrocarbon Allocation Meter Proving Frequency	Surface Comm Application Request
SC&M	30 CFR 250.1203(c)(1)	Gas Royalty/Allocation Meter Verification/Calibration Frequency	Surface Comm Application Request
SC&M	30 CFR 250.1204(b)(1)	Well Test Frequency	Surface Comm Application Request
SC&M	30 CFR 250.1205(a)(3)	Bypass Liquid Hydrocarbon Royalty Meters and Tanks	Surface Comm Application Request

Departure Example 1: Requesting a departure from the monthly provings prescribed by 30 CFR 250.1202(d)(3) for the liquid hydrocarbon royalty meters associated with an FMP Number in order to implement a quarterly proving schedule due to low liquid hydrocarbon quantities.

Departure Example 2: Requesting a departure from the requirements of 30 CFR 250.1202(k)(2) to allow monthly spot sampling of oil in lieu of proportional-to-flow sampling of production measured by a liquid hydrocarbon allocation turbine meter associated with an FMP Number.

3.3 Time Extensions

A Time Extension (formerly referred to as a waiver) is a new reporting category as of June 15, 2020, that is granted by the appropriate BSEE representative for an extension to a required regulatory timeframe.

Operators may select the following Time Extension types from a drop-down list in TIMS Web under the Variances tab as part of an MV submittal:



Table 2: Time Extension Types in TIMS Web under Variances tab

Permit Type	Regulation	Time Extension Description	Submittal Type
MV	30 CFR 250.1202(d)(3)	Liquid Hydrocarbon Royalty Meter Proving	Proving/Calibration Time Extension
MV	30 CFR 250.1202(f)(1)	Mechanical-Displacement Prover Calibration	Proving/Calibration Time Extension
MV	30 CFR 250.1202(k)(3)	Liquid Hydrocarbon Allocation Monthly Meter Proving	Proving/Calibration Time Extension
MV	30 CFR 250.1202(k)(4)	Liquid Hydrocarbon Allocation Quarterly Meter Proving	Proving/Calibration Time Extension
MV	30 CFR 250.1203(c)(1)	Gas Royalty Meter Calibrations	Proving/Calibration Time Extension
MV	30 CFR 250.1203(c)(1)	Gas Allocation Meter Calibrations	Proving/Calibration Time Extension
MV	30 CFR 250.1204(b)(1)	Periodic Well Test	Well Test Time Extension

Proving/Calibration Time Extension Example: Requesting to extend the timeframe of the required proving requirement of LACT meters monthly (not to exceed 42 days) as prescribed by 30 CFR 250.1202(d)(3) due to the pipeline company being unable to fly to the offshore platform due to inclement weather.

Well Test Time Extension Example: Requesting to extend the timeframe of the requirement for a periodic well test used for allocation at least once every 60 days as prescribed by 30 CFR 250.1204(b)(1) due to a problem with the test separator on the offshore facility.

Note 1: Since the validation requirements for Multiphase Flow Meters are given in the BSEE commingling and measurement approval letter, all requests for departures and time extensions from these validation requirements must be submitted as SC&M Requests in the TIMS Web portal.

Note 2: All requests for departures and time extensions from the measurement and calibration requirements for Flare/Vent gas meters must be submitted under Resource Conservation Requests and Reports in the TIMS Web portal.



4 Force Majeure

- A. As defined in 30 CFR 250.1201, a force majeure event is an event beyond your control such as war, act of terrorism, crime, or act of nature which prevents you from operating the wells and meters on your OCS facility.
- B. Typical force majeure events in the Gulf of Mexico Region are developed tropical weather systems such as tropical storms and hurricanes which cause platform evacuations and shut ins.
- C. If a GOM facility is forced to shut-in due to a tropical weather system, meters/tanks on the facility are not required to be proved/calibrated within the proving cycle. Per BSEE regulations, when a force majeure event precludes the required monthly meter proving or calibration, meters must be proved or calibrated within 15 days after being returned to service.
- D. If a proving/calibration deadline is missed due to a force majeure event, then it is recommended that operators include documentation in their meter proving/calibration filing system that reflects the asset was impacted by a force majeure event.
- E. Wells beyond the 60-day producing cycle must be tested within 15 days after being returned to production. If the well cannot be tested within 15 days, then a well test time extension is required.

F. Example Scenarios related to force majeure events:

Scenario No. 1: An offshore facility proves its oil royalty meters at a LACT unit on 5/17/2020. The facility is forced to shut in on 6/15/2020 due to an approaching hurricane. Due to this force majeure event, these meters must be proved within 15 days after being returned to service. If the facility comes back online 6/25/2020, the meters must be proved by 7/10/2020. A meter proving time extension for June is not required. If a proving cannot be accomplished by 7/10/2020, a meter proving time extension is required.

Scenario No. 2: An offshore facility calibrates its gas royalty meters on 7/6/2020. The operator is forced to shut in on 7/24/2020 due to an approaching hurricane. Due to this force majeure event, these meters must be calibrated within 15 days after being returned to service. If the facility comes back online 9/5/2020, an August time extension is not required, and these meters must be calibrated by 9/20/2020. If a calibration cannot be accomplished by 9/20/2020, then a meter calibration time extension for September is required. Gas volume statements indicating zero volume must be submitted for the month of August.

Scenario No. 3: Approximately 300 platforms were evacuated during the last week of August 2020 due to an approaching hurricane. If well tests were due in the last week of August but could not be performed due to the platform being shut-in and evacuated, then BSEE would not require time extension requests for the affected wells due to the force majeure event. Wells beyond the 60-day producing cycle would be required to be tested within 15 days after returning to production. If a platform returned to production on 9/20/2020, BSEE would not require well test time extension requests for September but would expect the affected wells to be tested by 10/5/2020. A well test time extension would be required if the affected wells cannot be tested by 10/5/2020.

Note: Facilities impacted by a force majeure event must submit evacuation statistics to BSEE on a daily basis as required by 30 CFR 250.192. Statistics include identification of the facilities and rigs evacuated and the amount of oil and gas production that has been shut in.