



## 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. Denise McGuire  
Cleopatra Gas Gathering Company, LLC  
P.O. Box 2648  
Houston, Texas 77252-2648  
Denise.McGuire@Shell.com

**RE: Life Extension – Right-of-way (ROW) Pipeline Riser  
Green Canyon, 782, Mad Dog, CID-Str No. 1215-1  
ROW Pipeline Segment No. 13673  
Authority: ROW No. OCS-G23442**

Dear Ms. McGuire:

The Bureau of Safety and Environmental Enforcement (BSEE) records indicate Cleopatra Gas Gathering Company, LLC is the pipeline Right-of-way (ROW) holder for one or more pipeline risers installed on the subject floating production system (FPS). On December 19, 2001, Cleopatra Gas Gathering Company, LLC submitted the initial application for installation of the subject pipeline riser. The Minerals Management Service (MMS), BSEE's predecessor, approved the application on July 29, 2002. The BSEE-approved service life of the pipeline riser was set at 20 years from the initial hydrostatic pressure test conducted on June 30, 2004, 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 holders, 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 riser 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 riser, please be prepared to discuss a timeline for the submittal of the decommissioning application for the ROW pipeline and riser.

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](mailto:pipelines@bsee.gov).

Sincerely,

**OTHO  
BARNES**

Digitally signed by  
OTHO BARNES  
Date: 2025.06.03  
15:12:36 -05'00'

Otho Barnes  
Regional Supervisor  
Regional Field Operations

Cc: Identified Operator, Shell Pipeline Company LP: [Denise.McGuire@Shell.com](mailto:Denise.McGuire@Shell.com)