



Jose "J.J." Jaramillo
Chief Pilot, Aircraft Operations

April 14, 2021

US Department of Transportation
Docket Operations
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE.
Washington, DC 20590

Subject: Petition for the Extension of Exemption #10895C

Chevron Aircraft Operations is requesting extension of Exemption #10895C from the Federal Aviation Administration (FAA) concerning §91.9(a) of Title 14, Code of Federal Regulations (14CFR). We are seeking relief from section 91.9(a) which prescribes, in part, that no person may operate a civil aircraft without complying with the operating limitations in the approved Rotorcraft Flight Manual.

Exemption #10895C is for operations conducted in our Sikorsky S-92A aircraft when operating between land-based and offshore facilities or when operating between two offshore facilities.

The requested exemption, if extended, would allow Chevron USA to continue operations in the Sikorsky S-92A helicopters using CAT A profiles with limited exposure to engine failure during takeoff and landing while carrying 19 passengers between land-based and offshore facilities or when operating between two offshore facilities, in day, night, visual flight rules, and instrument flight rules.

Exemption #10895C expires on August 31, 2021. If approved, Chevron requests an extension of at least 2 years.

Chevron USA's Sikorsky S92A helicopters were certified under Part 29, amendment 47, which relates to safety and ditching equipment which provides the highest level of safety today. The S-92A's are equipped with aircraft flotation gear and are certified for ditching in up to sea state 5. Additionally, when operating over water, each S-92A occupant is provided and wears personal flotation with EPIRB equipment. Also, the S-92A is equipped with life rafts that can be deployed from inside or outside the aircraft.

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European operators, using the same aircraft, operate the S-92A in accordance with Joint Aviation Requirement-OPS-3 which already permits similar operations with limited exposure to engine failure. We have operated our Sikorsky S-92A aircraft under this exemption since 2013.

We believe that the request to extend this exemption will allow Chevron to continue to provide the same level of safety that is currently in place for our offshore operations. Under the current Chevron USA usage of the S-92A aircraft, we have collected data related to the engine reliability and it shows that we have never had an inflight shutdown of an engine in 19,042 hours operated.

Chevron USA has operated under this exemption in the United States since 2013 which authorized operations similar to International Civil Aviation Organization (ICAO) Performance Class 2 with limited exposure. During this period, no S-92A accidents have been caused by power loss due to engine failure during takeoff and landing.

Chevron USA will further mitigate exposure by: (1) Conducting flight operations to and from helidecks and shore based heliports that meet or exceed size and weight requirements appropriate to the aircraft configuration; (2) Training its crews in a Level D, FFS (Full Flight Simulator) initially and annually, ensuring the highest levels of proficiency and competency for CAT A profiles and procedures; (3) Conducting route checks to confirm that its crews remain procedurally compliant and use crew resource management principles during all flight operation; and (4) Using Chevron's Helicopter Flight Data Monitoring program to ensure flight profiles are in accordance with Performance Class 2 procedures and the Chevron S-92A Flight Standards Manual VOL II.

Without the exemption relief, we would have to offer to our customer's smaller, older, less sophisticated aircraft that do not provide the same level of safety. This would result in an overall degradation of safety and not serve the most important stakeholder, the passenger.

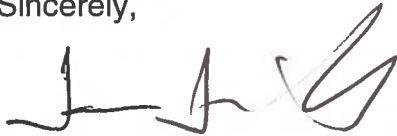
Chevron USA believes that granting of this extension would be in the public interest because the S-92A aircraft has replaced older designs which do not offer the same safety enhancements, and those aircraft are not required to meet the stringent performance requirements imposed on the S-92A and other similar aircraft.

In closing, Chevron USA has operated under Exemption #10895 and a renewed exemption #10895A, #10895B, and #10895C since 2013. Chevron USA operates under the conditions and limitations set forth within the exemption.

Chevron USA trains and checks in an FFS (Full Flight Simulator) facility conducted under FAR Part 135 with enhanced emphasis to these exemption conditions and limitations.

If I may be of further assistance in this matter or if you require additional information, please do not hesitate to contact me or the Chevron USA office located in Picayune, MS.

Sincerely,



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