



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 #13995B

Chevron Aircraft Operations is requesting extension of Exemption #13995B from the Federal Aviation Administration (FAA) concerning §91.9(a) of Title 14, Code of Federal Regulations (14CFR). Section 91.9(a) prescribes, in part, that no person may operate a civil aircraft without complying with the operating limitations specified in the approved Rotorcraft Flight Manual. Specifically, the AW139 Rotorcraft Flight Manual states in Supplement 12 (page S12-A5), Supplement 50 (page S50-4) and Supplement 97 (page S97-5) prescribes, in part, minimum demonstrated helideck size of 50 feet by 50 feet size or 50-foot diameter.

Exemption #13995B allows relief from Section 91.9(a). Specifically, relief from Supplements 12, 50 and 97, CAT A Helideck Size, to operate to and from a minimum helideck size of 35 feet by 35 feet or 35-foot diameter and to operate Performance Class 2 (PC2) with limited exposure to engine failure of nine seconds.

PC2 (RFM Section 9, pg. 9-129) allows operations to a CAT A standard profile and performance at a reduced helideck size and to sea state 4. In addition, Chevron's AW139 are equipped with aircraft floatation gear and are certified for ditching in up to sea state 5. Additionally, when operating over water, each AW139 occupant is provided, and wears, personal floatation with EPIRB equipment. Also, the AW139 is equipped with life rafts that can be deployed from inside or outside the aircraft.

European operators, using the same aircraft, operate the AW139 in accordance with Joint Aviation Requirement-OPS-3 (Section 9, Supplemental Performance-Performance Class), which already permits similar operations to smaller helidecks with limited exposure to engine failure.

The requested exemption extension, would allow Chevron to continue operations in AW139 helicopters using CAT A profiles with limited exposure to engine failure during takeoff and landing between land-based and offshore facilities, in day, night, visual flight rules, instrument flight rules and to operate to and from a helideck to a minimum size of 35 feet by 35 feet or 35-foot diameter. Chevron Aircraft Operations has incorporated into their manuals a minimum size helideck limitation of 35 feet by 35 feet or 35-foot diameter size along with other stated operating limitations.

Exemption #13995B expires on 10/31/2021. If approved, Chevron requests an extension of at least 2 years. Chevron has operated our AW139 aircraft under Exemption #13995 since 2015.

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 current Chevron USA usage of the AW139 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 78,401 hours operated.

Chevron USA will further mitigate exposure by: (1) Conducting flight operations to and from helidecks and shore based heliports that meet or exceed size, weight and meets performance 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 operations; 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 AW139 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 AW139 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 AW139 and other similar aircraft.

In closing, Chevron USA has operated under Exemption #13995 since 2015. 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,

A handwritten signature in black ink, appearing to read 'J.J. Jaramillo', written in a cursive style.

Jose "J.J." Jaramillo
Chief Pilot
jjaramillo@chevron.com

Gulf of Mexico Business Unit
Aircraft Operations
Chevron U.S.A. Inc
96 Runway Rd.
Picayune, MS. 39466
Tel 601 749 4082
Mobile 228 342 4587
Fax 601 749 4028