



BPXP Plea Agreement

2015

Annual Progress Report

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Preface

On the evening of April 20, 2010, a gas release and subsequent explosion occurred on the Deepwater Horizon drilling rig working on the Macondo exploration well for BP in the Gulf of Mexico. Eleven people died as a result of the accident and others were injured. We deeply regret this loss of life and recognize the tremendous loss suffered by the families, friends and co-workers of those who died.

The accident involved a well integrity failure, followed by a loss of hydrostatic control of the well. This was followed by a failure to control the flow from the well with the blowout preventer (BOP) equipment, which allowed the release and subsequent ignition of hydrocarbons. Ultimately, the BOP emergency functions failed to seal the well after the initial explosions. Multiple investigations and evidence presented in federal court have shown the accident was the result of multiple causes involving multiple parties.

We regret the impacts on the environment and livelihoods of those in the communities affected. We have, and continue to, put in place measures to help ensure it does not happen again. BP is committed to sharing what we have learned to advance the capabilities and practices that enhance safety in our company and the deepwater industry.

On November 15, 2012, BP reached an agreement with the US Government to resolve all federal criminal claims arising out of the incident. On January 29, 2013, the Plea Agreement was entered and BP Exploration & Production Inc. (BXP) plead guilty to federal crimes. The Plea Agreement can be found at:

<http://www.justice.gov/iso/opa/resources/43320121115143613990027.pdf>

As required by the Plea Agreement the following document summarizes the efforts that BXP has made to comply with the obligations of Paragraphs 5 through 31 of the Remedial Order (Exhibit B) of the Plea Agreement. Each Paragraph section of the Annual Progress Report corresponds to the same Paragraph section of the Remedial Order. Each of the Remedial Order obligations in 2015 were completed by BXP on time and were in compliance with the requirements.

Paragraph 23 of the Remedial Order requires BXP to create a public website where the following information must be posted:

- Lessons learned from the Deepwater Horizon incident;
- Annual progress reports summarizing BXP's compliance with Paragraphs 5 through 31 of the Remedial Order;
- Annual summaries of recordable safety incidents, days away from work, hydrocarbon spills and the volume thereof; and
- An annual list of all incidents of non-compliance (INC) with the Bureau of Safety and Environmental Enforcement (BSEE) or the Bureau of Ocean Energy Management (BOEM) regulations or probation for which BXP is cited, including corrective actions taken and penalties assessed.

The BXP public website is found at the following link:

<http://www.bxpcompliancereports.com>

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List of Acronyms & Abbreviations

AC or A/C	Air Conditioner	CE(S)	Critical Equipment (Safety)
AB	Able Bodied or Able Bodied Seaman	CFR	Code of Federal Regulations
ACP	Area Contingency Plans	CGA	Clean Gulf Associates
ACS	Acoustic Control System or Anti-Collision Signal	CM	Critical Maintenance
AD	Assistant Driller	COP	Common Operating Picture
ADCP	Acoustic Doppler Current Profiler	COS	Center for Offshore Safety
AESTL	Area Engineering Support Team Leader	COTP	Captain of the Port
AGT	Authorized Gas Tester	CoW	Control of Work
AIS	Automated Identification System	CPA	Closest Possible Approach or Closest Point of Approach
AMR	Americas Region (Seadrill)	CSP	Certified Safety Professional
AOB	Air Operations Branch	CST	Country Support Team
AOM	Area Operations Manager	DAFWC	Days Away From Work Case
APD	Application for Permit to Drill	DC	Drill Center
API	American Petroleum Institute	DC-317	Drill Center 317
ASP	Audit Service Provider	DDIII	Development Driller III
AUX	Auxiliary	DOCL	Documentation Unit Leader
bbf	Barrel	DOJ	U.S. Department of Justice
BHA	Bottom Hole Assembly	DP	Differential Pressure; Dynamic Positioning
BOD	Basis of Design	DPO	Dynamic Positioning Officer
BOEM	Bureau of Ocean Energy Management	DPZ	Distinct Permeable Zone
BOP	Blowout Preventer	DROPS	Dropped Object Prevention Scheme
BOPE	Blowout Preventer Equipment	EAMS	Ensco Asset Management System
BPXP	BP Exploration & Production Inc.	EAP	Employee Assistance Program
BS	Bachelor of Science	ECR	Engine Control Room
BSEE	Bureau of Safety and Environmental Enforcement	ECS	Expanded Containment System
BSR	Blind Shear Ram	EDS	Emergency Disconnect System
BST	Business Support Team	EMT	Emergency Medical Technician
C&EA	Corporate & External Affairs	ENVL	Environment Unit Leader
CAM	Contractor Account Manager	EPA	Environmental Protection Agency
CCM/ER	Crisis & Continuity Management/ Emergency Response	ER	Emergency Room or Emergency Response

ESD	Emergency Shut Down	HSE	Health, Safety, & Environment
ESI	Environmental Sensitivity Index	HSSE	Health, Safety, Security, & Environmental
EST	Executive Support Team	HWDP	Heavy Weight Drill Pipe
ETA	Estimated Time of Arrival	IA	Initiative Authority
EWELL	Electronic Well (Permitting and Reporting System)	IADC	International Association of Drilling Contractors
F	Fahrenheit	IAP	Incident Action Plan
FAQ	Frequently Asked Questions	IC	Incident Command
FGC	Field Gas Compressor or Fuel Gas Compressor	ICP	Incident Command Post
FIBC	Flexible Intermediate Bulk Containers	ICS	Incident Command System
FOSC	Federal On Scene Commander	IFS	Seadrill's Preventive Maintenance System
FTP	Field Training Program	IMH	Incident Management Handbook
F/V	Fishing Vessel	IMT	Incident Management Team
GIS	Geographic Information System or Grand Isle Shipyard	INC	Incident of Non-Compliance
GOC	Guidance on Certification	IOSC	International Oil Spill Conference
GoM	Gulf of Mexico	IP	Injured Person
GOO	Global Operations Organization	IPW	Incident Potential Worksheet
GPS	Global Positioning System	ISB	In-Situ Burner
GRP	Geographic Response Plans	ISM	International Safety Management
GWO	Global Wells Organization	ISSOW	Integrated Safe Systems of Work
H2S	Hydrogen Sulfide	IT	Information Technology
H&S	Health and Safety	IWCF	International Well Control Forum
HAZID	Hazard Identification	JIC	Joint Information Center
HAZOP	Hazard And Operability Study	JP	Job Plan
HAZWOPER	Hazardous Waste Operations & Emergency Response	JSA	Job Safety Analysis/Assessment
HC	Hydrocarbon	JSEA	Job Safety and Environmental Analysis
HITRA	Hazard Identification Task Based Risk Assessment	LA	Louisiana
HMC	Houston Monitoring Center	LAN	Local Area Network
HoF	Head of Function	LDIS	Light Duty Intervention System
HOLC	Houma Operations Learning Center	LEL	Lower Explosion Limit
HRO	Human Resources Officer	LER	Local Electrical Room
HS	Health and Safety	LL	Lessons Learned
		LMRP	Lower Marine Riser Package
		LOFR	Liaison Officer

LOG	Logistics	OPC	Operational Planning Cycle
LOSCO	Louisiana Oil Spill Coordinator's Office	OPS	Operations
LSL	Level Safety Low	OSC	Operations Section Chief
MCV	Modular Capture Vessels	OSRC	Oil Spill Response Coordinator
MD	Measured Depth	OSRO	Oil Spill Response Organizations
MGS	Mud Gas Separator	OSRP	Oil Spill Response Plan
M-HOP	Moveable Hang Off Platform	OSV	Offshore Supply Vessel
MOC	Management of Change	PA	Public Address or Performing Authority
MODU	Mobile Operating Drilling Unit	PA/GA	Public Address / General Alarm System
mph	Miles per Hour	P&ID	Piping and Instrumentation Diagram
MPT	Marine Portable Tank	PDQ	Production, Drilling, & Quarters
MS	Masters of Science	PIER	Public Information Emergency Response
MSD	Marine Sanitation Device	PIO	Public Information Officer
MSL	Marine Section Leader	PIP	Performance Improvement Plan
MSRC	Marine Spill Response Corporation	PM	Preventive Maintenance
MSU	Marine Safety Unit (Morgan City)	PMF	Preservation Maintenance Facility
MTC	Medical Treatment Case	POOH	Pull Out Of Hole
M / V	Marine Vessel	PPE	Personnel Protective Equipment
MWCC	Marine Well Containment Company	ppg	Pounds per gallon
N2	Nitrogen	PPFG	Pore Pressure & Fracture Gradient
NA or N/A	Not Applicable/Not Available	ppm	Parts per Million
NCP	National Contingency Plan	PQ	Production Quarters
NGC	North American Gulf Coast	PRBD	Protection and Recovery Branch Director
NM	Nautical Miles	PREP	Preparedness for Response Exercises Program
NOAA	National Oceanic & Atmospheric Administration	PRJ	Personal Responsibility Journey
NOLA	New Orleans, Louisiana	PSC	Planning Section Chief
NOV	National Oilwell Varco	PSD	Platform Shutdown
NPDES	National Pollution Discharge Elimination System	PSI	Pounds per Square Inch
NPREP	National Preparedness for Response Exercises Program	PSL	Pressure Safety Low
NRC	National Response Center	PSO	Planned Safety Observation
OEM	Original Equipment Manufacturer	PSV	Pressure Safety Valve
OIM	Offshore Installation Manager	PTW	Permit to Work
		QHSE	Quality, Health, Safety, Environment

QI	Qualified Individual	SMS	Safety Management System
RCA	Root Cause Analysis	SMW	Surface Mud Weight
RCD	Response Containment Demonstration	SOBD	Synthetic Oil Based Mud
RCFA	Root Cause Failure Analysis	SOC	Safety Observation Conversation
RES	Resource Unit	SOFR	Safety Officer
RISOP	Rig Intake & Start-up Operating Practice	SOSC	State On Scene Commander
ROV	Remote Operated Vehicle	SPA	Single Point of Accountability
RMS	Rig Maintenance Supervisor	SRCS	Single Ram Capping Stack
RP	Recommended Practice or Responsible Party	SRL	Self-Retracting Lifeline
RPM	Request for Permit Modification	SSC	Scientific Support Coordinator
RRP	Risk Ranked Procedure	SSE	Short Service Employee
RRT	Regional Response Team	SSOW	Safety Standard
RSFM	Rig-Site Fluid Management	START	Safe Today and Return Tomorrow
RSTC	Rig Safety and Training Coordinator	STBD	Starboard
RTM	Response Tactics Manual	STC	Safety Training Coordinator
RW	Restricted Work	STEM	Standard Equipment Maintenance Inspection
RWA	Region Wide Action	SURF	Subsea Umbilicals, Risers and Flowlines
S&OR	Safety and Operational Risk	SWA	Stop Work Authority
SBM	Synthetic Based Mud	SWI	Safety Work Instruction
SC	Source Control	SWP	Safe Work Permit or Safe Work Practice
SCB	Source Control Branch	TAR	Turnaround
SCBD	Source Control Branch Director	TBD	To Be Determined
SCE	Safety Critical Equipment	TBRA	Task Based Risk Assessment
SCSC	Source Control Support Coordinator	TGEN	Turbine Generator
SDIS	Subsea Dispersant Injection System	TGLO	Texas General Land Office
SEMS	Safety and Environmental Management System	TH	Thunder Horse
SETA	Segment Engineering Technical Authority	TIH	Tripping in Hole
SIMOPS	Simultaneous Operations	TIW	Texas Iron Works
SLB	Schlumberger	TL	Team Lead
SLS	Support Ring Landing Shoulder	TMS	Total Management System (Seadrill) or Transocean Management System
SMART	Specific, Measurable, Achievable, Realistic, Time Bound	TOFS	Time Out for Safety
SME	Subject Matter Expert	TOI	Transocean International
		TRAT	Task Risk Assessment Table

TRG	The Response Group
TSL	Technical Section Leader
TTX	Table Top Exercise
TX	Texas
UC	Unified Command
UHV	Model name for Radio
UPS	Uninterruptible Power Supply
USCG	U.S. Coast Guard
USFWS	U.S. Fish and Wildlife Service
UV	Ultra Violet
VDL	Variable Deck Load
VHF	Variable High Frequency
VID	Vendor Invoice Management Identification
VIV	Vortex Induced Vibration
VOC	Volatile Organic Compound
VP	Vice President
VPH	Vertical Pipe Handler
WAR	Well Activity Reports
WC	Well Control
WCBD	Well Control Bridging Document
WCC	Work Control Certificate
WCCA	Well Control Competency Assessment
WCD	Worst Case Discharge
WI	Work Instruction
WIF	Work Instruction Form
WIMS	Work Instruction Management System
WRA	Written Risk Assessment
WSL	Well Site Leader
WSM	Weekly Safety Meeting
WSOC	Well Specific Operating Criteria
WTL	Well Team Leader
ZGA	Z-Back Gripper Assembly
ZMS	Zone Management System

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BPXP Plea Agreement

2015

**Annual Progress Report
Safety and Environmental Management
Systems (SEMS) Audits
(Paragraphs 5-8)**

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Safety and Environmental Management Systems (SEMS) Audits

BPXP utilizes Safety and Environmental Management System (SEMS) audits to assess conformance with its operating management system in the areas of health, safety and the environment. These audits are led by independent third parties following the “Third Party SEMS Auditing and Certification of Deepwater Operations Requirements” as specified by the Center for Offshore Safety (COS).

5-8.1 Measures Taken to Comply

In 2015, BPXP’s efforts to enhance its SEMS Audit program included:

1. Continuing to work with COS on industry standardization and audit programs.
2. Verification of COS membership provision in new drilling rig contracts.
3. Revisions to the BPXP Remedial Order Implementation Plan Paragraph 8 SEMS Audit Schedule and the BPXP SEMS Program to address changes in BPXP’s asset portfolio.
4. Completion of an additional SEMS audit of the Transocean International Development Driller III drilling rig, which was employed to work on behalf of BPXP in 2015.
5. Submission of SEMS Audit documentation (Audit Plan, Audit Report and Corrective Action Plan) to BSEE per the regulatory required timelines.

The report which follows is structured to align with the BPXP Plea Agreement Remedial Order Implementation Plan Paragraphs 5 through 8, concerning annual reporting.

5-8.2 Additional Information

5-8.2.1 SEMS Audits for Contracted Drilling Rigs - 2015

In 2015, BP conducted a SEMS Audit of the Transocean International Development Driller III (DD III) drilling rig, as shown in **Table 5-8.1**.

Table 5-8.1: Summary Report on SEMS Audits - 2015 Contracted Drilling Rigs

Drilling Rig Information			SEMS Audit Activities					
Rig Owner	Rig Name	Asset Type	3rd Party SEMS Auditor	Audit Plan Submission	Audit Start	Audit Completion	Audit Report/ Corrective Action Plan Submission	Type of Audit
Transocean International	Development Driller III	Drilling Rig	ERM-CVS	6/4/2015	7/7/2015	9/24/2015	11/18/2015	Additional

Notes: “Additional” audits signify audits that were completed in addition to regulatory requirements.

5-8.2.2 SEMS Audits For Contracted Drilling Rigs - 2016

In the coming year 2016, BPXP plans to conduct a SEMS Audit of the Seadrill West Auriga drilling rig in accordance with the triennial audit cycle outlined in BSEE regulations at 30 CFR 250 Subpart S. The BPXP SEMS audit activities scheduled for 2016 are presented in **Table 5-8.2**.

Table 5-8.2: Summary Report on SEMS Audits - 2016 Contracted Drilling Rigs

Drilling Rig Information			SEMS Audit Activities*					
Rig Owner	Rig Name	Asset Type	3rd Party SEMS Auditor	Audit Plan Submission	Audit Start	Audit Completion	Audit Report/ Corrective Action Plan Submission	Type of Audit
Seadrill	West Auriga	Drilling Rig	ERM-CVS	6/24/2016	7/25/2016	9/16/2016	11/18/2016	Regulatory

Notes: "Regulatory" audits fulfil BPXP's obligation under 30 CFR 250 Subpart S.

*Planned dates subject to change for which appropriate notice will be given.

5-8.2.3 COS Affiliation of Existing BPXP Drilling Rig Contractors

In 2015, all of BPXP's contracted Rig Contractors, with respect to deepwater drilling rigs operating in the Gulf of Mexico were members of the Center for Offshore Safety (COS), per paragraph 6.2.1. **Table 5-8.3** provides a listing of these Drilling Rig Contractors along with their COS affiliation status at the end of year 2015.

Table 5-8.3: List of 6.2.1 Drilling Rig Contractors and Their COS Affiliation Status - 2015

Drilling Rig Contractor	COS Affiliation Status
Seadrill	Member
Transocean International	Member
Ensco	Member

5-8.2.4 Non-6.2.1 Deepwater Drilling Contractors and COS Affiliation

BPXP did not contract with any non-6.2.1 Deepwater Drilling Rig Contractors for work in the Gulf of Mexico in 2015.

5-8.2.5 SEMS Audits with Drilling Rig Contractors – 2015

As previously mentioned, **Table 5-8.1** identifies the SEMS Audit activities in 2015 which involved BPXP's Drilling Rig Contractors. **Table 5-8.1** includes the Drilling Rig Contractor involved, the completion dates of the SEMS audit activities, the drilling rigs which were audited and the third party SEMS auditor who conducted the audit.

5-8.2.6 SEMS Audit for Platforms/Platform Rigs – 2015

There were no scheduled SEMS Audits of a Platform or Platform Rig in 2015 and none were conducted.

5-8.2.7 SEMS Audit Activities Platforms/Platform Rigs – 2016

In the coming year 2016, BPXP plans to conduct a SEMS Audit of the Thunder Horse Platform and on the Thunder Horse PDO Platform Rig in accordance with the triennial audit cycle outlined in BSEE regulations at 30 CFR 250 Subpart S. The BPXP SEMS audit activities scheduled for 2016 are presented in **Table 5-8.4**.

Table 5-8.4: Summary Report on SEMS Audits - 2016 Platforms and Platform Rigs

Asset Information (BPXP)			SEMS Audit Activities*					
Asset Owner	Asset Name	Asset Type	3rd Party SEMS Auditor	Audit Plan Submission	Audit Start	Audit Completion	Audit Report/ Corrective Action Plan Submission	Type of Audit
BPXP	Thunder Horse	Platform	ERM-CVS	6/24/2016	7/25/2016	9/16/2016	11/18/2016	Regulatory
BPXP	Thunder Horse PDO	Platform Rig	ERM-CVS	6/24/2016	7/25/2016	9/16/2016	11/18/2016	Regulatory

Notes: "Regulatory" audits fulfil BPXP's obligation under 30 CFR 250 Subpart S.

*Planned dates subject to change for which appropriate notice will be given.

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**Annual Progress Report
Third Party Verification of Blowout
Preventers (BOP)
(Paragraph 9)**

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Third Party Verification of Blowout Preventers (BOP)

BPXP has developed and implemented processes to sustain enhanced operational oversight of the testing and maintenance of subsea blowout preventers (BOP). Each time BPXP or its contractors initially latch a subsea BOP at the well site and each time the BOP is brought to the surface after it has been latched to a well, BPXP or its contractors, through a third party, verifies that all required surface testing and maintenance of the BOP were performed in accordance with the manufacturer recommendations and American Petroleum Institute (API) Recommended Practice or API Standard 53, as applicable.

9.1 Measures Taken to Comply

Multiple processes, tools, and techniques were deployed to sustain enhanced rigor and additional oversight to the BOP testing and maintenance activities. The following activities were used throughout 2015:

- A process and associated checklist to verify that the relevant Applications for Permit to Drill (APD) include the requirement for Third Party Verification.
- A BOP register, which identifies each time a subsea BOP was unlatched and brought to surface after being latched to a well. This register indicates the date a BOP was latched at the well site, the date the BOP was unlatched and brought to the surface, the date(s) the verification occurred, identification of the third party verifier, a link to a copy of the verification letters and additional pertinent information.
- An electronic storage location for verification letters and BOP associated documentation.

9.2 Additional Information

9.2.1 Deepwater Drilling Rigs with Subsea BOPs

During the 2015 calendar year, BPXP operated 9 subsea BOP equipped rigs in the Gulf of Mexico (GoM). The BPXP 2015 GoM operated rigs equipped with subsea BOP are listed below:

1. Discoverer Enterprise (released on March 19, 2015);
2. DD III;
3. West Sirius (released on April 24, 2015);
4. West Capricorn;
5. West Auriga;
6. West Vela;
7. DS-3;
8. DS-4 (released on August 19, 2015); and
9. Thunder Horse PDQ.

The BOP register contains each of the Drilling Rigs and tracks the required BOP activities.

9.2.2 Third Party Verifiers

BPXP interchangeably utilizes two companies to provide third party verification of surface testing and maintenance for each time BPXP or its contractors initially latch a subsea BOP at the well site and each time the subsea BOP is brought to the surface after it has been latched to a well. This verification confirms that such surface testing and maintenance are in accordance with manufacturer recommendations and API Recommended Practice or API Standard 53, as applicable.

9.3 Certifications

BPXP certified that each time BPXP or its Contractors, in the conduct of Deepwater Drilling Operations that included a subsea BOP on a moored or dynamically positioned Drilling Rig, initially latched a subsea BOP at the well site, and each time the subsea BOP was brought to the surface after it had been latched to a well, a third party verified that all required and recommended testing and maintenance of the BOP was performed on the surface in accordance with manufacturer recommendations and API Recommended Practice or API Standard 53.



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**Annual Progress Report
Deepwater Well Control Competency
Assessments
(Paragraph 10)**

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Deepwater Well Control Competency Assessments

A Well Control Competency Assessment (WCCA) Plan, that exceeds the competency requirements of 30 CFR § 250.1500-1510 (Subpart O), was developed and implemented for Deepwater Well Control Personnel in BPXP in 2013.

10.1 Measures Taken to Comply

During 2015, 19 BPXP Well Control Personnel were assessed against the WCCA Plan. All 19 of the assessed individuals met the established requirements. None of the assessed individuals were found in need of further training. In 2015, BP initiated a comprehensive assessment program for Well Site Leaders (WSL) to replace the legacy Well Control Competency Assessment. This assessment is similar in format to the comprehensive Wells Team Leader assessment that was initiated in 2014. These assessments focus on four key areas, which include: Leadership, Core Technical, Role Specific, and Well Control competencies. During 2015, 18 Well Site Leaders and one Wells Superintendent were assessed against these competencies; all were found to have met the established requirements. **Table 10.1** below shows the WCCA training statistics for 2015.

Table 10.1: 2015 Well Control Competency Assessment Statistics

BPXP 2015 Well Control Competency Assessment Statistics						
BPXP Aggregate Well Control Personnel for 2015*	All		WSLs		WTLs	
	92		80		12	
Well Control Competency Assessments	No.	%	No.	%	No.	%
Aggregate assessed in 2015	19	21	18	23	1	8
Aggregate assessed in 2015 found competent (met required proficiency, functioning in role with continuing development opportunities)	19	21	18	23	1	8
Aggregate assessed in 2015 found in need of further training (before functioning in role)	0	0	0	0	0	0
Aggregate further training completed and re-assessed in 2015	0	0	0	0	0	0

Notes: *Aggregate Well Control Personnel for 2015 reflects the aggregate number of persons who held the position at any point during the calendar year, rather than the staffing level at any point in time.

10.2 Additional Information

10.2.1 Subpart O - IADC WellCAP Training

The International Association of Drilling Contractors (IADC) WellCAP program is adaptive and changes to meet industry specific needs. The IADC WellCAP program provides the fundamental knowledge and skills for well control personnel, resulting in a comprehensive organizational well control program. BPXP Well Control Personnel have continued to attend IADC WellCAP Supervisory Training. In December 2014, the Bureau of Safety and Environmental Enforcement (BSEE) concurred with a modification to the Subpart O Well Control training requirements to allow for the use of either the International Well Control Forum (IWCF) Well Control course or the IADC WellCAP course, based on their determination that the courses are equivalent. In December 2014, the U.S. Department of Justice (DOJ) approved the corresponding modifications to Paragraphs 10.2, 10.3, and 12.2 of the BPXP Remedial Order Implementation Plan. On January 15, 2015, BPXP also received approval from the United States Probation Office with respect to the modification previously approved by the DOJ.

In 2015, 44 BPXP Well Control Personnel attended the IADC Drilling Surface and Subsea training sessions; and 42 attended the IADC Well Servicing training sessions. **Table 10.2** below shows the IADC WellCAP and IWCF training summary for 2015.

Table 10.2: 2015 IADC WellCAP and IWCF Training Summary

BPXP 2015 IADC WellCAP and IWCF Training Summary						
BPXP Aggregate Well Control Personnel for 2015*	All		WSLs		WTLs	
	92		80		12	
Completed Training during 2015	No.	%	No.	%	No.	%
IADC WellCAP and IWCF Course - Level						
Drilling and Subsea - Supervisory Level	44	48	41	51	3	25
Well Servicing - Supervisory Level	42	46	36	45	6	50

Notes: * Aggregate Well Control Personnel for 2015 reflects the aggregate number of persons who held the position at any point during the calendar year, rather than the staffing level at any point in time.

10.2.2 Additional Training Capability

In addition to the IADC WellCAP and IWCF training noted above, the WCCA Plan includes “Well Control Bundle” training. The Well Control Bundle training covers topics such as well control, pressure testing, well control bridging documents, drilling well control manual, and responsibilities and requirements for well monitoring. The Well Control Bundle training began late in 2013 with a total of four BPXP Well Control Personnel trained. In 2014, 80 BPXP Well Control Personnel attended the training course. In 2015, all the remaining BPXP Well Control Personnel attended the training course.

As a separate effort from the WCCA Plan requirements, BPXP provides additional in house training through the Applied Deepwater Well Control course using BP’s well control simulator. **Table 10.3** below illustrates the Well Control Bundle training summary statistics for 2015.

Table 10.3: 2015 Well Control Bundle Training Statistics Since Previous BPXP Annual Report

BPXP 2015 Well Control Bundle Training Statistics						
Aggregate in need of Well Control Bundle Training before Oct 31 st 2015	All		WSLs		WTLs	
		92		80		12
Aggregate Who Completed Well Control Bundle Training before Oct 31 st 2015	No.	%	No.	%	No.	%
	92	100	80	100	12	100

Notes: Aggregate Well Control Personnel for 2015 reflects the aggregate number of persons who held the position at any point during the calendar year, rather than the staffing level at any point in time.

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Annual Progress Report Cement Design and Competency (Paragraph 11)

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Cement Design and Competency

In 2013, BPXP developed a procedure that established the framework for screening and selecting Cementing Technical Specialist candidates. This procedure outlines the necessary skills, qualifications, experience, and development for Cementing Technical Specialists as the qualified Subject Matter Expert (SME). Using this procedure to select Cementing Technical Specialists helps maintain enhanced oversight on cement designs used for primary cementing of casing and exposed hydrocarbon zones. The selected Cementing Technical Specialists review and approve cement designs for Deepwater Drilling Operations.

11.1 Measures Taken to Comply

In 2014, an analysis was completed to assure that all four existing Cementing Technical Specialists had fulfilled the requirements of the approved *Procedure for Cementing Technical Specialist Candidate Screening*. There were no additional BPXP Gulf of Mexico Cementing Technical Specialists hired in 2015.

BPXP utilizes two third party independent laboratories to conduct or witness testing of relevant cement slurry designs for primary cementing of casing and exposed hydrocarbon bearing zones relating to Deepwater Drilling Operations. During the 2015 calendar year, a qualified Cementing Technical Specialist reviewed and approved all of the required cement designs and corresponding independent laboratory test results. These laboratory test results were included in the relevant Well Activity Reports (WAR) submitted to the Bureau of Safety and Environmental Enforcement (BSEE).

Throughout 2015, the name and title of the respective Cementing Technical Specialist who reviewed and approved the cement designs were included in each relevant Application for Permit to Drill (APD) submitted to BSEE for primary cementing of casing and exposed hydrocarbon-bearing zones related to the Deepwater Drilling Operation.

11.2 Certifications

11.2.1 Cementing Technical Specialists

BPXP provided a list of the Cementing Technical Specialists and certified that each of them have successfully completed the requirements set forth in the *Procedure for Cementing Technical Specialist Candidate Screening*.

11.2.2 Applications for Permits to Drill (APD)

BPXP certified that each Application for Permit to Drill submitted in 2015 for Deepwater Drilling Operations included a supplemental attachment containing (a) the name and title of the SME who reviewed and approved the cement designs contained in the APD for primary cementing of casing and exposed hydrocarbon-bearing zones related to the well, and (b) a statement in the supplemental attachment to the APD that lab testing of cement slurries for primary cementing of casing and exposed hydrocarbon bearing zones relating to the well were conducted or witnessed by an engineer competent to evaluate such lab testing or a competent third party independent of the cement provider.

11.2.3 Well Activity Reports (WAR)

BPXP certified that each relevant Well Activity Report (“WAR”) submitted in 2015 to the applicable BSEE field office for Deepwater Drilling Operations included the results of lab testing of cement slurries for primary cementing of casing and exposed hydrocarbon bearing zones relating to the well. The results included the name and title of the engineer competent to evaluate such lab testing or the competent third party independent of the cement provider who conducted or witnessed the lab testing.



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**Annual Progress Report
Houston Monitoring Center
(Paragraph 12)**

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Houston Monitoring Center

BPXP's Houston Monitoring Center (HMC) started monitoring Gulf of Mexico Drilling Rigs conducting Deepwater Drilling Operations in July of 2011. The HMC was designed to remotely monitor drilling data transmitted from offshore to onshore for drilling information, which includes active pit volumes, pump pressures, flow rates out, gas units, and trip displacements. It operates 24 hours a day, 7 days a week throughout the year on rotational 12-hour shifts.

12.1 Measures Taken to Comply

Multiple processes, tools, and techniques have been deployed in the maintenance of the HMC. These include, but are not limited to:

- Maintenance of the real-time drilling monitoring center with the capability to monitor Well Control data such as active pit volume, pump pressure, flow rate out, gas units and trip displacement;
- Continuous staffing of the HMC with relevant personnel who possess International Association of Drilling Contractors (IADC) WellCAP certification to monitor such data;
- A written contingency plan addressing appropriate steps and procedures when the operation of the HMC has been disrupted; and
- Well control data backup and retention.

12.2 Additional Information

The HMC is on the 12th floor of the Westlake 4 Building and is located at the following physical address:

200 Westlake Park Boulevard
Houston, Texas 77079

Number and Titles of HMC Staff currently supporting the site include:

- Well Monitoring Specialist – Number is rig count dependent. Each Well Monitoring Specialist monitors no more than two rigs simultaneously per 12-hour shift, 24-hour coverage;
- HMC Well Site Leader – Four total with one per 12-hour shift, 24-hour coverage;
- Team Leader – One total during normal business hours and on-call outside of business hours;
- Information Technology (IT) Support Team - Five staff with one scheduled per 12-hour shift, 24-hour coverage; and
- Software Application Support Team - Four staff with one scheduled per 12-hour shift, 24-hour coverage.

A brief description of the key monitoring staff follows:

- Well Monitoring Specialist – Provides onshore 24 hours a day seven days a week monitoring of the real-time data coming into the HMC from the rig-line operations, based on agreed parameters and protocols; maintains chat session with rig site mud logger to assure understanding of current operations and makes notifications when monitored values fall outside the “normal” range per HMC Monitoring Plan.
- HMC Well Site Leader – Oversees the Well Monitoring Specialists; implements the HMC Monitoring & Response process and follow-up with the rig site teams on actions resulting from alert notifications according to the agreed event escalation guidelines and communication protocols; assists with preparation of HMC Monitoring Plans, outlining key parameters that will be monitored and the acceptable ranges.
- Team Leader – Provides overall supervision for the Houston Monitoring Center, including support teams; interacts with the well planning teams to define and approve the HMC Monitoring Plan for each well; serves as lead interface between HMC and Gulf of Mexico (GoM) Wells Leadership during alert notifications.

The general HMC staffing schedule includes:

- Well Monitoring Specialists and HMC Well Site Leaders work a two-week on/two-week off rotation in 12-hour shifts.
- The Team Leader works normal business hours and is on-call outside of normal business hours.
- The Support Team personnel typically work one-week on and one-week off in 12-hour shifts, although there is some variability in number of days worked continuously.
- Shift-change and start-times are staggered.

The HMC data is stored electronically and is backed up weekly, with daily incremental backups. The HMC electronic information subject to the implementation plan requirements will be retained for at least five years.

In 2015, the Auditor and representatives of the United States requested access to the HMC on numerous occasions, and all of their requests were granted. A summary list of the days when the Auditor or representatives of the United States requested access to the HMC can be found in **Table 12.1**.

Table 12.1: 2015 BPXP Houston Monitoring Center Visitor Log

2015 BPXP HMC Auditor or US Representative Visitor Log		
Date of Requested Visit	Affiliation	Request Granted
01/22/2015	Bureau of Safety & Environmental Enforcement (BSEE) Representative	Yes
04/15/2015	Third Party Auditor	Yes
04/15/2015	Third Party Auditor	Yes
04/27/2015	BSEE Representative	Yes
04/27/2015	BSEE Representative	Yes
04/27/2015	BSEE Representative	Yes
04/27/2015	BSEE Representative	Yes
04/27/2015	BSEE Representative	Yes
04/27/2015	BSEE Representative	Yes
04/27/2015	BSEE Representative	Yes
08/06/2015	BSEE Representative	Yes
08/06/2015	BSEE Representative	Yes
09/01/2015	United States Congressman	Yes
09/02/2015	Third Party Auditor	Yes
12/14/2015	United States Coast Guard Representative	Yes

There were three instances during the 2015 calendar year that the HMC was unable to monitor a Drilling Rig for more than eight consecutive hours.

1. A fiber optic line to the mudlogging unit on the West Vela was accidentally severed for 9:15 hours.
2. Issues associated with the purge system on the mudlogging unit on the Thunder Horse PDQ for 8:57 hours.
3. Rig power distribution issues across the DS-3 rig impacted the mudlogging unit for 28:58 hours.

These issues impacted remote well monitoring for the HMC personnel only. The connectivity issues identified did not impact ongoing well monitoring by rig site personnel.

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BPXP Plea Agreement

2015

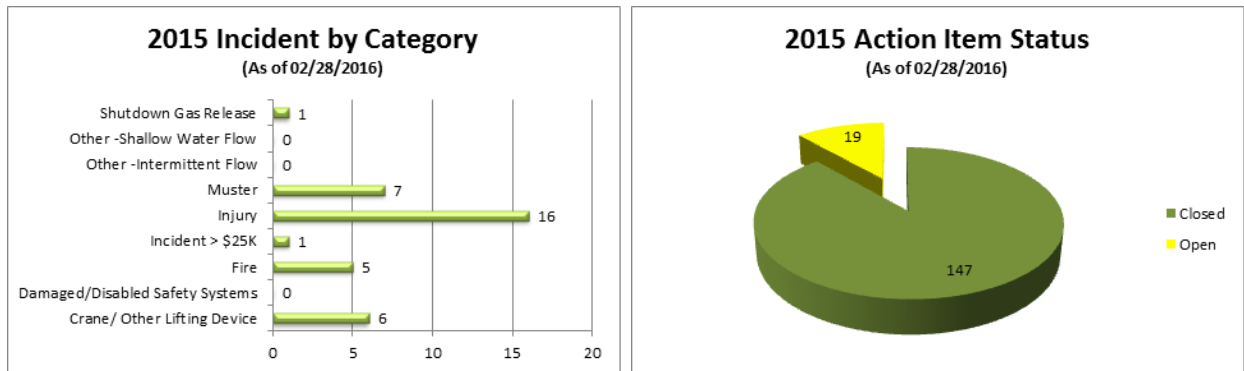
**Annual Progress Report
Incident Reporting
(Paragraph 13)**

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Incident Reporting

In 2015, BPXP continued to document incidents reported per the Bureau of Safety and Environmental Enforcement (BSEE) regulations in 30 CFR § 250.188. These incidents were reviewed monthly to identify trends, address systemic issues, and monitor closure of corrective and/or preventive actions.

In 2015, there were 36¹ incidents that were required to be reported to BSEE under 30 CFR § 250.188. The most common types of incidents by category involved injuries, musters², and cranes or other lifting devices. An analysis of the 16 injuries shows that 31% were leg or feet injuries, 31% were head or neck injuries, and 19% were pinched fingers. Learnings from incident investigations of the injuries resulted in improvements to equipment design, increased rigor in risk assessments, and new or revised work procedures. Most of the muster incidents were the result of either equipment leaks or overheated electrical equipment, which were quickly resolved without further escalation. BPXP is continuing to work closely with its contractors to reduce crane/lifting incidents by making equipment modifications, focusing on safe zone management, modifying pre-lift inspection checks and revising procedures for planning and executing lifts.



As a result of the 36 incidents and subsequent incident investigations, 166 actions were identified. Of the 166 actions identified, 147 actions have been closed and 19 remain open as of February 28, 2016. Of the remaining 19 open actions, none are overdue. Of the 41 open actions in the 2014 Annual Report, 40 were closed in 2015; the single remaining 2014 open action is due for on-time completion in 2016.

The completed actions resulted in 44 changes to the Safety and Environmental Management System (SEMS) plans; i.e. site-specific changes to BPXP or contractor safety and environmental work practices, systems and/or tools. The most frequent SEMS changes involved policy or practice improvements (15), mostly in the areas of clarified procedures. Other common SEMS changes were in the areas of control of work improvements (10), dealing primarily with updates to task-based risk-assessments, and improvements to preventative maintenance systems (6).

¹Two of the reported incidents (one injury and one muster) were later determined to be non-reportable per BSEE 30 CFR 250.188. These incidents were included since the reports remain in BSEE's electronic well (e-Well) reporting database.

²One muster also included a process shut down.

13.1 Measures Taken to Comply

In 2015, BPXP continued to improve its incident investigation processes, analyze trends in incidents and, when informed by incident investigations, made modifications to its management system to address systemic issues. The incidents were reviewed monthly to evaluate progress and assure proper classification, reporting, and timely closure of corrective and preventive actions.



BPXP Plea Agreement

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**Annual Progress Report
Oil Spill Response Plan Training and
Exercises
(Paragraphs 14-19)**

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Oil Spill Response Training and Exercises

In 2015, BPXP continued to focus on maintaining the capability of its people, facilities, and processes to respond to oil spills and other extraordinary events. The organization conducted periodic reviews of its crisis and continuity and emergency response programs to assure compliance with regulatory and legal requirements and identify opportunities for improvement. BPXP also continued its developmental oil spill response training and exercise program to maintain awareness of risk and to develop leaders within its Incident Management Team (IMT).

14-19.1 Measures Taken to Comply

For the calendar year 2015, the organization's efforts to enhance its crisis management and emergency response programs included:

- Maintaining two crisis management centers located in Houston, Texas, and in Houma, Louisiana;
- Maintaining a crisis management organization of at least six personnel who are experienced in crisis management;
- Revising BPXP's Crisis Management Organization, Training and Exercise Plan to specify training and exercise requirements for its IMT leadership positions;
- Conducting 30 oil spill response training workshops to increase knowledge and enhance the response capability of the IMT staff;
- Utilizing BPXP's two crisis management centers to conduct six oil spill response exercises and test scenarios in the BP Gulf of Mexico Regional Oil Spill Response Plan (OSRP);
- Conducting one oil spill response exercise to practice transition of IMT and oil response resources between its primary and secondary crisis management centers;
- Monitoring and certifying oil spill response training and exercise completion for BPXP IMT leadership positions;
- Submitting notice for BPXP's 2016 Oil Spill Response Training Plan and Exercises Schedule to BSEE, USCG and other regulatory agencies with invitations for their agents to attend; and
- Maintaining descriptions of exercises and documentation of lessons learned in After-Action Reports for each series of table top oil spill response exercises.

The report which follows is structured to align with the BPXP Plea Agreement Remedial Order Implementation Plan Paragraphs 14 through 19, concerning annual reporting.

14-19.2 Additional Information and Certifications

14-19.2.1 Certification of Oil Spill Response Training (14.3.3.a)

BPXP required its Incident Commanders, Section Chiefs, Oil Spill Response Coordinators and their alternates in the IMT to complete position-specific oil spill response training to qualify them for their roles in year 2016. Where applicable, this training covered the subject matter outlined in Incident Command System (ICS) 100, 200, 300 and Federal Emergency Management Agency Independent Study (FEMA IS) 700/800.

For calendar year 2015, BXP certified that 34 individuals in the position-specific roles listed in **Table 14-19.1** completed the oil spill response training program to qualify them for the roles in the coming year 2016. Twenty-nine of the 34 personnel were in their position-specific role for the entire calendar year and five started after January 1, 2015. However, BXP certifies that regardless of start date in role, all 34 individuals completed the training program to qualify them for their role in the coming year.

Table 14-19.1: Oil Spill Response Training Summary – 2015

Incident Management Team Position-Specific Roles	Number Qualified For Role In 2016	Mandatory Training Requirements				
		MWCC Annual Training	Incident Commander/ Qualified Individual Training	Incident Management Team Annual Refresher Training	Section Leadership Training	Training Completion
Incident Commander	6	X	X	X	X	100%
Operations Section Chief	5	X		X	X	100%
Source Control Branch Director	7	X		X	X	100%
Planning Section Chief	5	X		X	X	100%
Logistics Section Chief	5	X		X	X	100%
Finance Section Chief	5	X		X	X	100%
Oil Spill Response Coordinator	1	X		X	X	100%
Total	34					

Note: The column titled “Number Qualified for Role in 2016” includes a count of the personnel who will act as alternates for the listed “Incident Management Team Position-Specific Roles”.

14-19.2.2 Certification of Oil Spill Response Exercises (14.3.3.b)

BXP continued to require that its Incident Commanders, Section Chiefs, Oil Spill Response Coordinators and their Deputies in the IMT participate in at least one table top oil spill response exercise to qualify them for their roles in year 2016. To support completion of this requirement, BXP conducted six oil spill response exercises that practiced scenarios in its OSRP. The six exercises which occurred on April 16, May 21, June 11, September 10, October 8, and October 29 of 2015 included activation of the source control equipment supplier, Marine Well Containment Company (MWCC), and simulated the coordination of response activities by several individuals and teams.

For calendar year 2015, BXP monitored the completion of oil spill response exercises by its Command Staff, Section Chiefs, Oil Spill Response Coordinators, and their deputies. BXP certified that 34 individuals in the position-specific roles listed in **Table 14-19.2** completed the exercise program to qualify

them for their roles in the coming year 2016. Twenty-nine of the 34 personnel were in their position-specific role for the entire calendar year and five started after January 1, 2015. However, BPXP certifies that regardless of start date in role, all 34 individuals completed the exercise program to qualify them for their role in the coming year.

Table 14-19.2: Oil Spill Response Exercises Summary - 2015

Incident Management Team Position-Specific Roles	Number Qualified For Role in 2016	Mandatory Exercise Requirements			
		BP Oil Spill Exercise	BP MWCC Exercise	Industry Exercise	Exercise Completion
Incident Commander	6	X	X		100%
Operations Section Chief	5	X	X		100%
Source Control Branch Director	7	X	X		100%
Planning Section Chief	5	X	X		100%
Logistics Section Chief	5	X	X		100%
Finance Section Chief	5	X	X		100%
Oil Spill Response Coordinator	1	X	X	X	100%
Total	34				

- Notes: 1. The "Number Qualified for Role in 2016" includes a count of the personnel who will act as alternates for the listed "Incident Management Team Position-Specific Roles".
 2. "Industry Exercise" means exercises that were sponsored by other industry and in which BPXP personnel participated.

14-19.2.3 Description of Training, Exercises and Lessons Learned (14.3.3.c)

BPXP continued to offer an oil spill response training program which allows personnel to develop through basic, core, advanced, and specialized courses into leadership roles within the IMT. This developmental training program included general and position-specific training to increase knowledge of the regulatory requirements, the ICS structure, and the roles and responsibilities for managing response. Where applicable, the courses included subject matter outlined in ICS 100, 200, 300 and FEMA IS 700/800. After completion of the minimum developmental training for assignment in an IMT leadership role, BPXP required all the Incident Commanders, Section Chiefs, Source Control Branch Directors, Oil Spill Response Coordinators, and their alternates to complete annual refresher training addressing subject matter in **Table 14-19.3**.

Table 14-19.3: Annual Position-Specific Training for IMT Leadership – 2015

IMT Leadership Position	Annual Training Requirements –2015
Incident Commander	Incident Command Tactics and Qualified Individual Workshop
	Marine Well Containment Company (MWCC) – Overview and Annual Update
	Incident Management Team Annual Refresher
Operations Section Chief	Operations Section Leadership Training
	Marine Well Containment Company (MWCC) – Overview and Annual Update
	Incident Management Team Annual Refresher
Source Control Branch Director	Source Control Branch Leadership Training
	Marine Well Containment Company (MWCC) – Overview and Annual Update
	Incident Management Team Annual Refresher
Planning Section Chief	Planning Section Leadership Training
	Marine Well Containment Company (MWCC) – Overview and Annual Update
	Incident Management Team Annual Refresher
Logistics Section Chief	Logistics Section Leadership Training
	Marine Well Containment Company (MWCC) – Overview and Annual Update
	Incident Management Team Annual Refresher
Finance Section Chief	Finance Section Leadership Training
	Incident Management Team Annual Refresher
Oil Spill Response Coordinator	Operations Section Leadership Training
	Source Control Branch Leadership Training
	Marine Well Containment Company (MWCC) – Overview and Annual Update
	Incident Management Team Annual Refresher

BPXP required its Incident Commanders, Section Chiefs, Source Control Branch Directors, Oil Spill Response Coordinators, and their alternates to complete at least one oil spill response table top exercise each year which address the mandatory exercise requirements outlined in **Table 14-19.4**, and which test the procedures identified in the BP Gulf of Mexico Regional Oil Spill Response Plan (OSRP).

Table 14-19.4: Annual Position-Specific Exercise Requirements for IMT Leadership – 2015

IMT Leadership Position	Mandatory Exercise Requirements		
	Oil Spill Exercise	MWCC Exercise	Industry/MWCC Source Control Exercise
	Annual	Annual	Annual
Incident Commander	X	X	
Operations Section Chief	X	X	
Source Control Branch Director	X	X	
Planning Section Chief	X	X	
Logistics Section Chief	X	X	
Finance Section Chief	X	X	
Oil Spill Response Coordinator	X	X	X

Note: It is possible for the requirements of an Oil Spill Exercise and a MWCC Exercise to be accomplished during the same exercise dependent on the objectives of that exercise.

BPXP conducted six oil spill response exercises in 2015 to support completion of the mandatory exercise requirements. A description of each exercise is provided in **Table 14-19.5: Oil Spill Response Exercise Summary – 2015**.

Table 14-19.5: Oil Spill Response Exercise Summary – 2015

Oil Spill Response Exercise				Participants				
Name	Description	Location/Duration	Date	BSEE	USCG	United States	MWCC	BPXP
Atlantis DC-317 Oil Spill – Day 1	Table Top Exercise - Day 1 of an incident involving oil spill and source control response, including activation of the Marine Well Containment Company	HCC 4 - 8 hours	4/16/15	X	-	-	X	X
			5/21/15	-	X	-	X	X
	Functional Exercise- Day 1 of an incident involving oil spill and source control response, including activation of the Marine Well Containment Company	HCC 8 - 12 hours	6/11/15	X	X	-	X	X
Atlantis DC-317 Oil Spill – Day 2	Table Top Exercise - Day 2 of an incident involving oil spill and source control response, including activation of the Marine Well Containment Company	HCC 4 - 8 hours	9/10/15	-	-	-	X	X
			10/8/15	X	-	-	X	X
Atlantis DC-317 Oil Spill – Day 2	Functional Exercise- Day 2 of an incident involving oil spill and source control response, including activation of the Marine Well Containment Company	HOLC and HCC 8 - 12 hours	10/29/15	X	X	X	X	X

- Notes:
1. "HCC" means the Houston Crisis Center and "HOLC" means the Houma Operations Learning Center (alternate crisis management center).
 2. "BPXP" means the Command Staff, Section Chiefs, Oil Spill Response Coordinator positions and their alternates as listed in Paragraphs 14.2.1 and 18.2.1 of the BPXP Plea Agreement Remedial Order Implementation Plan.
 3. "United States" means the list of agency personnel identified in Attachment A of the BPXP Plea Agreement Remedial Order Implementation Plan.
 4. "X" means one or more personnel in this category participated in the oil spill response exercise.

An outcome of the six exercises was the identification of several potential opportunities for improvement, or lessons learned. The lessons learned identified potential opportunities for improvement in the areas of procurement, internal communications, external communications, and considerations related to the utilization of new or revised BPXP-specific job aids. Other lessons learned cited opportunities to increase efficiencies in documentation by creating templates and checklists for frequently used forms.

14-19.2.4 Preparedness for Response Exercise Program (NPREP) (14.3.3.d)

Since year 2014, BPXP has exercised individual sections of its OSRP with the goal to test the entire Plan and complete all components of the National Preparedness for Response Exercise Program (NPREP) over a three year period. BPXP monitored the components of PREP and the sections of the OSRP which were tested in the oil spill response exercises conducted at the Thunder Horse, Na Kika, and Hopkins wells in 2014 and in the Atlantis DC-317 Series 1 and Series 2 exercises conducted in 2015. BPXP completed all of the NPREP components that are required in the triennial cycle in year 2015. The NPREP components which were completed in the exercises conducted in years 2014 and 2015 are documented in **Table 14-19.6: BPXP's Preparedness for Response Exercise Program Triennial Cycle Documentation Form**. **Table 14-19.7: BPXP Oil Spill Response Exercise Summary by OSRP Section - 2015** identifies the sections of BPXP's OSRP that were tested in the oil spill response exercises conducted in years 2014 and 2015.

Table 14-19.6: BXP's Preparedness for Response Exercise Program Triennial Cycle Documentation Form - 2015 (Oil Spill Response Exercises for Paragraphs 14, 17 and 18)

NPREP Component		2014 Exercises			2015 Exercises			
Comp.	Title	TH 19-Feb 24-Apr 22-May	NK 12-Jun 16-Sep 2-Oct	Hopkins 5-Nov 6-Nov	ATL-1 16-Apr 21-May	ATL-1 11-Jun	ATL-2 10-Sep 8-Oct	ATL-2 29-Oct
1	Notifications		X	X	X	X	X	
2	Staff Mobilization		X	X		X	X	X
3	Ability to Operate Within the Response Management System Described in the Plan	X		X	X	X	X	X
3.1	Unified Command	X	X	X	X	X	X	X
3.1.1	Federal Representation	X	X	X	X	X	X	X
3.1.2	State Representation	X	X	X	X	X	X	X
3.1.3	Local Representation	X		X	X			
3.1.4	Responsible Party Representation	X	X	X	X	X	X	X
3.2	Response Management System	X	X	X	X	X	X	X
3.2.1	Operations	X	X	X	X	X	X	X
3.2.2	Planning	X	X	X	X	X	X	X
3.2.3	Logistics	X	X	X	X	X	X	X
3.2.4	Finance	X	X	X	X	X	X	X
3.2.5	Public Affairs	X	X	X	X	X	X	X
3.2.6	Safety Affairs	X	X	X	X	X	X	X
3.2.7	Legal Affairs	X	X	X	X		X	X
4	Source Control	X	X	X	X	X	X	X
4.1	Salvage	X	X	X	X	X	X	N/A
4.2	Firefighting	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4.3	Lightering	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4.4	Other salvage equipment and devices	X	X	X		N/A	X	N/A
5	Assessment		X	X	X	X	X	X
6	Containment		X	X			X	X
7	Recovery	X				X		X
7.1	On-Water Recovery	X	X	X	X	X	X	X
7.2	Shore-Based Recovery	X				X		X
8	Protection	X						
8.1	Protective Booming	X	X	X		X		X
8.2	Water Intake Protection	X						
8.3	Wildlife Recovery	X	X	X	X	X	X	X
8.4	Population Protection	X		X	X		X	X
9	Disposal	X	X	X	X	X	X	X
10	Communication			X	X	X	X	X
10.1	Internal Communications		X	X	X	X	X	X
10.2	External Communications			X	X	X	X	X
11	Transportation			X	X	X	X	X
11.1	Land Transportation	X	X	X	X	X	X	X
11.2	Waterborne Transportation	X	X	X	X	X	X	X
11.3	Airborne Transportation			X	X	X	X	X
12	Personnel Support			X	X	X	X	X
12.1	Management		X	X	X	X	X	X
12.2	Berthing			X	X	X	X	X
12.3	Messing			X	X	X	X	X
12.4	Operational and Administrative Spaces			X	X	X	X	X
12.5	Emergency Procedures			X		X		X
13	Equipment Maintenance and Support			X				X
13.1	Response Equipment			X				X
13.2	Response Equipment (support equipment)			X				X
14	Procurement			X	X	X	X	X
14.1	Personnel			X	X	X	X	X
14.2	Response equipment		X	X	X	X	X	X
14.3	Support Equipment			X	X	X	X	X
15	Documentation	X	X	X	X	X	X	X

Notes: "N/A" means the specific section of the OSRP contains administrative information only that cannot be exercised.
 "X" means the specific section of the OSRP was tested in the exercise conducted on the listed exercises dates.
 "TH" means Thunder Horse. "NK" means Na Kika Platform.
 "ATL-1" denotes Atlantis Platform, Day 1 exercise scenario. "ATL-2" denotes Day 2 of the exercise scenario.

**Table 14-19.7: BPXP’s Oil Spill Response Exercise Summary by OSRP Section – 2015
(Oil Spill Response Exercises for Paragraphs 14, 17 and 18)**

GoM Region OSRP		2014 Exercises			2015 Exercises			
Section	Title	TH 19-Feb 24-Apr 22-May	NK 12-Jun 16-Sep 2-Oct	Hopkins 5-Nov 6-Nov	ATL-1 11-Jun	ATL-2 11-Jun	ATL-2 10-Sep 8-Oct	ATL-3 29-Oct
1	Quick Guide	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	Preface	N/A	N/A	X	N/A	N/A	N/A	N/A
3	Introduction			X				
4	Organization		X	X	X	X	X	X
5	Incident Command Post and Communications		X	X	X	X	X	X
6	Spill Detection and Source Identification and Control	X	X	X	X	X	X	X
7	QI, IMT, SROT, and OSRO Notifications		X	X	X	X	X	X
8	External Notifications		X	X	X	X	X	X
9	Available Technical Expertise	X	X	X	X	X	X	X
10	Strategic Response Planning		X	X	X	X	X	X
11	Spill Assessment and Volume Estimation		X	X		X	X	X
12	Resource Identification	X	X	X	X	X	X	X
13	Resource Protection Methods	X	X	X	X	X	X	X
14	Mobilization and Deployment Methods		X	X	X	X	X	X
15	Oil and Debris Removal Procedures	X	X	X	X	X	X	X
16	Oil and Debris Disposal Procedures	X	X	X	X	X		X
17	Wildlife Rehabilitation Procedures	X	X	X		X		X
18	Dispersant Use Plan	X	X	X	X	X	X	X
19	In-Situ Burning Plan	X	X	X	X	X	X	X
20	Alternative Chemical and Biological Response Strategies	X	X	X	X	X	X	X
21	Documentation		X	X		X		X
22	Prevention Measures for Facilities Located in State Waters	N/A	N/A	N/A	N/A	N/A	N/A	N/A
A	Facility Information	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B	Training Information	N/A	N/A	N/A	N/A	N/A	N/A	N/A
C	Drill Information	N/A	N/A	N/A	N/A	N/A	N/A	N/A
D	Contractual Agreements	N/A	N/A	N/A	N/A	N/A	N/A	N/A
E	Response Equipment	N/A	N/A	N/A	N/A	N/A	N/A	N/A
F	Support Services and Supplies	N/A	N/A	N/A	N/A	N/A	N/A	N/A
G	Notification and Report Forms	N/A	N/A	N/A	N/A	N/A	N/A	N/A
H	Worst Case Discharge Scenarios	X	N/A	N/A	N/A	N/A	N/A	N/A
I	Subsea Containment Information	N/A	N/A	N/A	N/A	N/A	N/A	N/A
J	Oceanographic and Meteorological Information	N/A	N/A	N/A	N/A	N/A	N/A	N/A
K	Bibliography	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Notes: “N/A” means the specific section of the OSRP contains administrative information only that cannot be exercised.
“X” means the specific section of the OSRP was tested in the exercise conducted on the listed exercises dates.
“TH” means Thunder Horse .. “NK” means Na Kika Production Platform.
“ATL-1” denotes Atlantis Production Platform, Day 1 exercise scenario, “ATL-2” denotes Day 2 of the exercise scenario

14-19.2.5 Crisis Management Centers and Organization (15.3.4.a)

BPXP continued to maintain the same crisis management centers: one in its Houston headquarters at the Westlake 4 office building, located at 200 Westlake Park Boulevard, Houston, Texas 77079, and the other located in Houma, Louisiana, at the Houma Operations Learning Center (HOLC), 1597 Highway 311, Schriever, Louisiana, 70395-3237.

Houston Crisis Center (HCC)



Houma Operations Learning Center (HOLC)



Each crisis management center is capable of safely accommodating 300 personnel, and includes access to a cafeteria, adequate parking and flexible meeting spaces to facilitate Incident Management Team operations of varied size and complexity. Each center also includes the communications equipment and technology to address real or simulated emergency response and incident management.

In addition, BPXP continued to maintain a crisis management organization of six individuals (one supervisor and five Crisis and Continuity Management /Emergency Response (CCM/ER) Advisors), with responsibilities for maintaining readiness for response. Their responsibilities included management of the crisis management centers and the conduct of training to enhance the capability of BPXP's Incident Management Team. **Figure 14-19.1** below shows the reporting structure for the crisis management organization in year 2015.

Figure 14-19.1: BPXP Crisis & Continuity Management/ Emergency Response Organization - 2015



As in year 2014, the offices for the CCM/ER staff were based in Houston. The staff would also report to the HOLC crisis management center if the Houston location was unavailable during a response. The work schedule for the crisis management organization was based on the 9-day/80-hour format in which

the team was off weekends and every other Friday. One CCM/ER Advisor was also assigned to provide additional 24-hour/7-day week coverage per the CCM/ER team's on call rotation.

BPXP replaced the CCM/ER Manager and one CCM/ER Advisor in 2015 due to organizational changes and attrition. The former staff was replaced with personnel that had previous crisis management experience. During the transition of replacement staff, BPXP provided additional coverage on CCM/ER activity through its central crisis management organization. The replacement staff along with the BPXP central crisis management organization assumed all responsibilities of the former staff. As a result, the crisis management organization was available for emergencies from January 1, 2015, through December 31, 2015, and BPXP's ability to respond was not reduced or impacted during the year.

The individuals in the crisis management organization hold college degrees and/or professional certifications and licenses in the areas of science, environment, safety and emergency management. At a minimum, each staff member had at least three years of experience in emergency management and was trained on the National Incident Management System (NIMS) framework and the subject matter covered in ICS 100, 200 and 300. Each staff member also had experience in responding to oil spills and other oil and gas related crisis events.

14-19.2.6 Availability of Crisis Management Centers (15.3.4.b)

The two BPXP crisis management centers were available to address emergencies all year, except for eight hours on August 22, 2015, when the HCC was unavailable due to planned maintenance on the information and technology infrastructure which resulted in loss of communications and network coverage. During the eight hours that the HCC was unavailable, BPXP could utilize the secondary crisis management center (HOLC) and adjacent offices in the Houston headquarters as alternate crisis management sites. There were no other changes in BPXP's crisis management centers in 2015 from 2014.

14-19.2.7 Description of Training and Exercises Involving Crisis Management Centers and/or Staff (15.3.4.c)

In 2015, the BPXP crisis management organization attended or conducted oil spill response training courses in the HCC crisis management center only. This training included courses designed for position-specific IMT leadership roles and courses covering the subject matter outlined in ICS 100, 200, 300 and FEMA IS 700/800. The crisis management organization also coordinated and participated in six oil spill response exercises: five in the HCC and one which utilized both the HCC and the HOLC crisis management centers. The oil spill response training and exercises were previously described in **Section 14-19.2.3: Description of Training, Exercises and Lessons Learned.**

14-19.2.8 Certification of OSR Training with MWCC (16.3.4.a)

In 2015, BPXP utilized its source control equipment supplier, MWCC, to conduct specialized training on the process for activating its services for well containment and source control. The training also described the components of MWCC's containment systems, including subsea dispersant application, capping, interim collection capabilities, and cap-and-flow systems. BPXP's Operations Section Chiefs and Source Control Branch Directors were required to complete this course to qualify for their position specific roles.

For calendar year 2015, BPXP monitored the completion of MWCC training by its Operations Section Chiefs and Source Control Branch Directors, and certified that 12 individuals in the position-specific roles listed in **Table 14-19.8** completed the exercise program to qualify them for their roles in the coming year 2016. Eleven of the 12 personnel were in their position-specific role for the entire calendar year and one started after January 1, 2015. However, BPXP certified that regardless of start date in role, all 12 individuals completed the exercise program to qualify them for their role in the coming year.

Table 14-19.8: Oil Spill Response Training Summary – 2015

Incident Management Team Position-specific Roles	Number Qualified For Role In 2016	Mandatory Training Requirements			
		MWCC Annual Training	Incident Management Team Annual Refresher Training	Section Leadership Training	Training Completion
Operations Section Chief	5	X	X	X	100%
Source Control Branch Director	7	X	X	X	100%
Total	12				

Note: The column titled "Number Qualified for Role in 2016" includes a count of the personnel who will act as alternates for the listed "Incident Management Team Position-Specific Roles".

14-19.2.9 Description of OSR Training with MWCC (16.3.4.b)

MWCC conducted five training workshops on behalf of BPXP in 2015. Each course was two to four hours in duration and described the equipment and capabilities of MWCC. The subject matter included the process to activate and interface with MWCC during a well control incident, the logistical considerations in activating, moving, and deploying MWCC systems, and the delineation of responsibilities between MWCC and member companies. The course described components of MWCC's interim containment system, including subsea dispersant application, capping, interim collection capabilities, and cap-and-flow systems.

14-19.2.10 Certification of Participation in Industry OSR Exercises (17.3.2.a)

BPXP certifies that one Oil Spill Response Coordinator (OSRC) was in his/her position-specific role for the entire 2015 calendar year and completed the exercise program to qualify for his/her role in 2016.

Table 14-19.9 summarizes the types of exercises which were completed by the OSRC for this certification.

Table 14-19.9: Oil Spill Response Exercises Summary - 2015

Incident Management Team Position-Specific Roles	Number Qualified For Role in 2016	Mandatory Exercise Requirements			
		BP Oil Spill Exercise	BP MWCC Exercise	Industry Exercise	Exercise Completion
Oil Spill Response Coordinator	1	X	X	X	100%
Total	1				

Notes: 1. The "Number Qualified for Role in 2016" includes a count of the personnel who will act as alternates for the listed "Incident Management Team Position-Specific Roles".

2. "Industry Exercise" means exercises that were sponsored by other industry and in which BPXP personnel participated.

14-19.2.11 Description of Industry OSR Exercises and Lessons Learned (17.3.2.b)

In 2015, BPXP's OSRC attended two oil spill response exercises sponsored by other operators. The OSRC observed the exercises to enhance his/her knowledge of other operators' practices and to understand how lessons learned could apply to BPXP's OSRP. **Table A14-19.10** describes the external industry exercises attended by the OSRC. Although there were no significant learnings affecting BPXP's OSRP, the OSRC observed during the exercises that the other operators faced similar challenges in the areas of communications between multiple sites and familiarization of staff with job aids for response.

Table 14-19.10: Industry Oil Spill Response Exercise Summary – 2015

Oil Spill Response Exercise				Participants				
Sponsor	Description	Location/ Duration	Date	BSEE	USCG	Other Agency	MWCC	OSRC
Bennu Oil/ Helix Well Control Group	Source control functional exercise simulating worst case discharge from a well. The well was a cap only well.	Bennu Oil Offices	3/24/15 to 3/25/15	X	X	--	X	X
MWCC/ Chevron Offshore	This exercise simulated the release from a well as a result of a microburst moving the vessel off station and parting the riser.	Chevron and MWCC Offices 2.5 days	5/13/15 to 5/15/15	X	X	--	X	X

Note: "X" means one or more personnel participated in the oil spill response exercise.

14-19.2.12 Preparedness for Response Exercise Program (NPREP) (17.3.2.c)

The organization utilized only BPXP sponsored exercises to evaluate its completion of the National Preparedness for Response Exercise Program (NPREP) components. The NPREP components which were completed in the BPXP exercises were previously addressed in **Section 14-19.2.4: Preparedness for Response Exercise Program (NPREP)**.

14-19.2.13 Certification of OSR Exercise for Activation of MWCC (18.3.3.a)

In 2015, BPXP conducted six oil spill response exercises which had a primary objective to simulate one or more of the source control notification, procurement, personnel, logistics, and all other actions necessary to cap or cap and contain a subsea loss of well control. Each of the exercises also included activation of the source control equipment supplier, MWCC. The MWCC personnel participated in each exercise after it was convened.

BPXP certifies that 34 individuals completed the exercise program to qualify them for their position-specific roles in the coming year 2016. Twenty-nine of the 34 personnel were in their position-specific role for the entire calendar year and five started after January 1, 2015. However, BPXP certifies that regardless of start date in role, all 34 individuals completed the exercise program to qualify them for their role in the coming year. A summary of the exercise program requirements for the 34 position-specific roles is provided in **Table 14-19.2**.

14-19.2.14 Description of OSR Exercise For Activation of MWCC (18.3.3.b)

The Atlantis DC-317 Series 1 and Series 2 exercises which included activation of the MWCC were previously described in **Section 14-19.2.3: Description of Training, Exercises and Lessons Learned**. The lessons learned from the exercises are also described in **Section 14-19.2.3**.

14-19.2.15 Preparedness for Response Exercise Program (NPREP) (18.3.3.c)

The NPREP components which were completed in the exercises conducted in years 2014 and 2015 are documented in **Table 14-19.6: BPXP's Preparedness for Response Exercise Program Triennial Cycle Documentation Form**.

14-19.2.16 Certification of Notice for OSR Exercises (19.3.1.a)

BPXP notified BSEE, the USCG and the United States at least 30 days prior to each of the oil spill response exercises that it intended to use to satisfy the exercise requirements of the Plea Agreement Paragraphs 14, 17, and 18. In addition, BPXP certified that notice was provided at least thirty days in advance of exercises. BPXP also invited BSEE, the USCG and the United States to attend and participate in the BPXP sponsored exercises. The invitation was not provided for the external industry exercises as they are outside of BPXP's control. **Table 14-19.11** provides a summary of the notices which were included in the certification. BPXP will continue to communicate activities for crisis management to encourage feedback and transparency of its oil spill response operations in 2016.

Table 14-19.11: Notices for Oil Spill Response Exercises Summary – 2015

Exercise Name (Applicable Paragraph)	Date(s) Drill Occurred	Exercises Description ¹	Agency Notified	Date Notified	
				Email	Courier or USPS
NPREP: Spill Management Team Table Top Exercise (14, 17, 18, 19)	04/16/2015	Table Top Exercise. Day 1 Houston Crisis Center: Incident involving oil spill and source control response including activation of the MWCC.	BSEE – Senior Planning Analyst, Oil Spill Response Division	11/19/2014	11/19/2014
			USCG – Captain , Sector Houston-Galveston	11/19/2014	11/19/2014
			USCG – Captain, MSU Morgan City	11/19/2014	11/19/2014
			USA	11/19/2014	11/19/2014
NPREP: Spill Management Team Table Top Exercise (14, 17, 18, 19)	05/21/2015	Table Top Exercise. Day 1 Houston Crisis Center: Incident involving oil spill and source control response including activation of the MWCC.	BSEE – Senior Planning Analyst, Oil Spill Response Division	11/19/2014	11/19/2014
			USCG – Captain , Sector Houston-Galveston	11/19/2014	11/19/2014
			USCG – Captain, MSU Morgan City	11/19/2014	11/19/2014
			USA	11/19/2014	11/19/2014
NPREP: Spill Management Team Table Top Exercise (14, 17, 18, 19)	06/11/2015	Table Top Exercise. Day 1 Houston Crisis Center: Incident involving oil spill and source control response including activation of the MWCC.	BSEE – Senior Planning Analyst, Oil Spill Response Division	11/19/2014	11/19/2014
			USCG – Captain , Sector Houston-Galveston	11/19/2014	11/19/2014
			USCG – Captain, MSU Morgan City	11/19/2014	11/19/2014
			USA	11/19/2014	11/19/2014
NPREP: Spill Management Team Table Top Exercise (14, 17, 18, 19)	09/10/2015	Table Top Exercise. Day 2 Houston Crisis Center: Incident involving oil spill and source control response including activation of the MWCC.	BSEE – Senior Planning Analyst, Oil Spill Response Division	11/19/2014	11/19/2014
			USCG – Captain , Sector Houston-Galveston	11/19/2014	11/19/2014
			USCG – Captain, MSU Morgan City	11/19/2014	11/19/2014
			USA	11/19/2014	11/19/2014
NPREP: Spill Management Team Table Top Exercise (14, 17, 18, 19)	10/08/2015	Table Top Exercise. Day 2 Houston Crisis Center: Incident involving oil spill and source control response including activation of the MWCC.	BSEE – Senior Planning Analyst, Oil Spill Response Division	11/19/2014	11/19/2014
			USCG – Captain , Sector Houston-Galveston	11/19/2014	11/19/2014
			USCG – Captain, MSU Morgan City	11/19/2014	11/19/2014
			USA	11/19/2014	11/19/2014
NPREP: Spill Management Team Table Top Exercise (14, 17, 18, 19)	10/29/2015	Table Top Exercise. Day 2 Houma Operations Learning Center (HOLC): Incident involving oil spill and source control response including activation of the MWCC.	BSEE – Senior Planning Analyst, Oil Spill Response Division	11/19/2014	11/19/2014
			USCG – Captain , Sector Houston-Galveston	11/19/2015	11/19/2015
			USCG – Captain, MSU Morgan City	11/19/2015	11/19/2015
			USA	11/19/2015	11/19/2015

Exercise Name (Applicable Paragraph)	Date(s) Drill Occurred	Exercises Description ¹	Agency Notified	Date Notified	
				Email	Courier or USPS
HWCG/ Benu Oil and Gas Exercise (17)	03/24/2015 – 03/25/2015	HWCG Exercise on behalf of Benu Oil and Gas LLC. This exercise has a source control objective	BSEE – Senior Planning Analyst, Oil Spill Response Division	01/20/2015	01/20/2015
			USCG – Captain , Sector Houston-Galveston	01/20/2015	01/20/2015
			USCG – Captain, MSU Morgan City	01/20/2015	01/20/2015
			USA	01/21/2015	01/20/2015
MWCC/ Chevron Exercise (17)	05/13/2015 – 05/14/2015	MWCC Exercise on behalf of Chevron North America Exploration and Production Company. This exercise had a source control objective and simulated one or more of the source control activities related to notification, procurement, personnel, logistics and other actions	BSEE – Gulf Oil Spill Preparedness Section Supervisor	04/6/2015	04/6/2015
			USCG – Captain , Sector Houston-Galveston	04/6/2015	04/6/2015
			USCG – Captain, MSU Morgan City	04/6/2015	04/6/2015
			USA	04/6/2015	04/6/2015

Notes: NPREP is National Preparedness for Response Exercise Program

1. Exercise descriptions are based on the original submission.
2. "USA" means the list of contacts defined as the "United States" in Attachment A of the BPXP Plea Agreement Remedial Order Implementation Plan.

14-19.2.17 List of OSR Exercises with United States Participation (19.3.1.b)

BSEE, the USCG and/or the United States participated in the BPXP sponsored exercises either as observers or in role play as active responders. **Table 14-19.5** identifies the oil spill response exercises in which they participated. BPXP also had active participation from state regulatory agencies, such as the Texas General Land Office (on 6/11/2015 and 10/8/2015) and the Louisiana Oil Spill Coordinators Office (on 10/29/2015).

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BPXP Plea Agreement

2015

**Annual Progress Report
OSRP Best Practices
(Paragraph 20)**

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OSRP Best Practices

In 2015, BPXP reviewed and revised its Gulf of Mexico Regional Oil Spill Response Plan (OSRP) to incorporate regulatory updates, operational changes, learnings from oil spill response exercises, and the requirements of the Remedial Order Implementation Plan Paragraph 20 (a)-(g):

- a. Provisions to maintain access to a supply of dispersant and fire boom for use in the event of an uncontrolled long-term blowout for the length of time required to drill a relief well;
- b. Contingencies for maintaining an ongoing response for the length of time required to drill a relief well;
- c. Description of measures and equipment necessary to maximize the effectiveness and efficiency of the response equipment used to recover the discharge on the water's surface, including methods to increase encounter rates;
- d. Information regarding remote sensing technology and equipment to be used to track oil slicks, including oil spill detection systems and remote thickness detection systems (e.g., X-band/infrared systems);
- e. Information regarding the use of communication systems between response vessels and spotter personnel;
- f. Shoreline protection strategy that is consistent with applicable area contingency plans; and
- g. For operations using a subsea BOP or a surface BOP on a floating facility, a discussion regarding strategies and plans related to source abatement and control for blowouts from drilling.

On June 23, 2015, BPXP submitted the proposed changes in a revised Version 12 OSRP to the BSEE for approval and included a document describing where the requirements of Paragraph 20(a)-(g) are located in the OSRP. The map of these requirements is provided in **Table 20.1: BP Gulf of Mexico Regional Oil Spill Response Plan (6/2015) Map to Plea Agreement**. BSEE approved the revised OSRP on July 8, 2015.

Additionally, BPXP certified to BSEE and the United States that the BPXP Plea Agreement Remedial Order Implementation Plan Paragraph 20(a)-(g) requirements were located in the OSRP which was approved by BSEE on July 8, 2015.

BPXP continues to review and practice scenarios from its approved OSRP to increase knowledge of responders and continually improve oil spill response.

**Table 20.1: BP Gulf of Mexico Regional Oil Spill Response Plan (06/2015)
Map to Plea Agreement**

Plea Agreement Remedial Order Paragraph 20 Requirement	Where Requirement is Addressed in the 06/2015 OSRP
<p>Paragraph 20(a): Provisions to maintain access to a supply of dispersant and fireproof boom for use in the event of an uncontrolled long-term blowout for the length of time required to drill a relief well.</p>	<ul style="list-style-type: none"> • Section 18, Figure 18-2: Lists dispersant stockpiles. Section 18.A: Describes capability of NALCO to ramp up dispersant production for ongoing long term response. Additionally, BP describes the incident potential assessment to estimate dispersant demand. • Section 19.A: Lists BP’s access to in situ burn systems and describes equipment/supply replacement capabilities for ongoing long-term response through Elastec and other boom manufacturers. Additionally, BP describes the incident potential assessment to estimate fire boom demand.
<p>Paragraph 20(b): Contingencies for maintaining an ongoing response for the length of time required to drill a relief well.</p>	<ul style="list-style-type: none"> • Appendix H.1-13: Describes response strategies and capabilities for maintaining an ongoing response. • Section 18.A, Appendix H: Describes BP’s strategy to ensure availability of dispersant equipment and inventory for the duration of the response. • Section 19.A and Appendix H: Lists BP’s access to in situ burn systems and describes the strategy of BP to ensure that fire boom is available for the duration of the response. • Section 7.D: Describes access to Oil Spill Removal Organization response support capabilities. • Appendix F: Lists support services and supply vendors for a response. • Section 7.D: Discusses access to additional spill response resources and personnel such as Marine Spill Response Corporation’s Spill Team Area Responders program, the National Response Corporation’s National Response Network, and Clean Gulf Associates’ Preferred Response Organizations. • Section 4.B: Discusses the use of personnel from BP Mutual Response Teams, Incident Management Teams from other regions, and BP Retirees to aid in the ongoing response. • Section 16: Discusses plans and procedures for waste management.

Plea Agreement Remedial Order Paragraph 20 Requirement	Where Requirement is Addressed in the 06/2015 OSRP
<p>Paragraph 20(c): Description of measures and equipment necessary to maximize the effectiveness and efficiency of the response equipment used to recover the discharge on the water's surface, including methods to increase encounter rates.</p>	<ul style="list-style-type: none"> • Section 11.D: Discusses remote sensing technologies with a table [Figure 11-2] outlining capabilities and limitations. • Appendix H.7: Discusses use of X-band/infrared systems in the worst case discharge scenarios. • Section 15.B: Discusses the use of automated identification system [AIS] for vessel tracking and X-band/infrared radar to improve efficiency during a response. • Section 15, Figure 15-1: Discusses offshore cleanup procedures including mechanical recovery and different types of booming. • Section 15, Figure 15-2: Discusses shallow water booming methods. • Section 13, Figure 13-1: Discusses offshore protection methods, including various booming tactics. • Appendix H.3: Discusses use of systems such as AIS and spotter aircraft with communications systems in the worst case discharge scenarios. • Appendix H.7: Includes discussion of technology to facilitate night-time skimming.
<p>Paragraph 20(d): Information regarding remote sensing technology and equipment to be used to track oil slicks, including spill detection systems and remote thickness detection systems (e.g., X-band/infrared systems).</p>	<ul style="list-style-type: none"> • Section 11.D: Discusses remote sensing technologies with a table [Figure 11-2] outlining capabilities and limitations. • Section 15.B: Discusses use of radio communications, vessel tracking technology and remote sensing technology to aid mechanical recovery resources. • Appendix H.3: Discusses use of X-band/infrared systems in the worst case discharge scenarios.
<p>Paragraph 20(e): Information regarding the use of communication systems between response vessels and spotter personnel.</p>	<ul style="list-style-type: none"> • Section 15.B: Describes requirements for automated identification system [AIS] for vessel tracking and the use of air-to-vessel communications during a response. • Appendix H.3: Discusses use of systems such as AIS and spotter aircraft with communications systems in the worst case discharge scenarios.
<p>Paragraph 20(f): Shoreline protection strategy that is consistent with applicable area contingency plans.</p>	<ul style="list-style-type: none"> • Section 13.A: Describes the use of Area Contingency Plans, The Response Group's Shoreline Protection Guides, and National Oceanic and Atmospheric Administration's Environmental Sensitivity Index maps to aid in the development of shoreline protection. • Appendix H.13: Discusses a shoreline response and equipment that would be needed for protection.

Plea Agreement Remedial Order Paragraph 20 Requirement	Where Requirement is Addressed in the 06/2015 OSRP
<p>Paragraph 20(g): For operations using a subsea BOP or a surface BOP on a floating facility, a discussion regarding strategies and plans related to source abatement and control for blowouts from drilling.</p>	<ul style="list-style-type: none"> • Sections 18.D,18.E, and Appendix H.11: Discuss subsea dispersant application directly in the source. • Appendix I: References the Regional Containment Demonstration and Applications for Permits to Drill, which contains strategies, equipment, contractors, and personnel allocated for a subsea response.

Acronyms:

ACP	Area Contingency Plan
AIS	Automated Identification System
APD	Applications for Permit to Drill
BOP	Blowout Preventer
CGA	Clean Gulf Associates
ESI	Environmental Sensitivity Index
IMT	Incident Management Team
ISB	In Situ Burn
MSRC	Marine Spill Response Corporation
NALCO	Company name – NALCO Corporation
NOAA	National Oceanic and Atmospheric Administration
NRC	National Response Corporation
OSRO	Oil Spill Removal Organization
RCD	Regional Containment Demonstration

20.1 Measures Taken to Comply

In 2015, BPXP’s efforts to enhance its Gulf of Mexico Regional Oil Spill Response Plan (OSRP) included:

1. Revising the OSRP to incorporate regulatory updates, operational changes, learnings from oil spill response exercises, and the BPXP Plea Agreement Paragraph 20(a)-(g) requirements.
2. Providing a document that describes where the requirements of the Remedial Order Implementation Plan Paragraph 20(a)-(g) are found in the OSRP.
3. Reviewing the OSRP and Certifying that BPXP Remedial Order Implementation Plan Paragraph 20(a)-(g) requirements were included in the submitted and approved 2015 OSRP.
4. Reviewing and practicing scenarios from its OSRP to increase knowledge of the responders and to continually improve oil spill response.



BPXP Plea Agreement

2015

Annual Progress Report Safety Technology Developed with Industry (Paragraph 21)

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Safety Technology Developed with Industry

In 2013, BPXP submitted proposals to the Bureau of Safety and Environmental Enforcement (BSEE) for two Pilot Safety Technology Projects as described. BSEE formally approved the proposed projects on May 30, 2014. BPXP has collaborated with industry to develop these technologies to enhance operational safety with respect to deepwater drilling.

Pilot Project Plan 21.1: Real-Time Remote Blowout Preventer (BOP) Pressure Test Monitoring aims to extend the capabilities of digital BOP testing technology. The system will enable remote observation of pressure testing of subsea BOPs by personnel from onshore.

Pilot Project Plan 21.2: Real-Time Rig-Site Fluid Monitoring aims to identify additional parameters that may be indicative of developing well control or lost circulation events.

21.1 Measures Taken to Comply

In 2014 and early 2015, BPXP submitted a Request for Proposal (RFP) to several universities and research institutes to conduct the independent third party technical feasibility and economic evaluation for these projects. On July 21, 2015, a contract was awarded to conduct an independent third party technical feasibility and economic evaluation of each project.

The 2015 status of the two Pilot Project Plans is described below.

Pilot Project Plan 21.1: Real-Time Remote Blowout Preventer (BOP) Pressure Test Monitoring

The following section describes the specifics of Real-Time Remote BOP Pressure Test Monitoring Pilot Project Plan.

Purpose:	Remotely interpret and document well integrity positive pressure tests on a rig with remote BOP data to display pressure path.
Target Pilot Start Date:	4Q 2015
Proposed Location:	Gulf of Mexico, Deepwater Drilling Rig DS-3
Collaboration Partner:	Kongsberg Oil & Gas Technologies Inc.
Cost to Pilot:	~\$8 million

In 2013, BPXP proposed development of a project aimed to extend the capabilities of Digital BOP Testing technology – both in terms of wider availability (remote locations including onshore) and in terms of the functionality it provides (to include other positive pressure tests).

The project objective is to demonstrate and deploy advances in the display and interpretation of these BOP tests as follows:

- Pressure testing software availability to be extended to on-network applications accessible from multiple locations.
- Pressure test data and data interpretation to be visible in the Houston Monitoring Center (HMC) for the applicable BPXP Gulf of Mexico (GoM) drilling rig(s).
- Pressure test data and data interpretation observation opportunity will be provided to the BSEE GoM Region/District, upon request, via a one-way network accessible communication link. These observations, made during the BP technology pilot, will allow BSEE to gain a better understanding of the technology necessary to conduct remote BOP inspection testing.
- Subsea BOP and valve position data to be visible adjacent to each pressure test display.
- Pressure paths to be interpreted from position data and highlighted on a BOP diagram.

Status of the key activity areas planned for 2015 are as follows:

- *Develop technical feasibility testing procedures and Develop economic evaluation procedures are completed:*
 - Contracts have been agreed with an independent third party;
 - Parameters and metrics for both the technical feasibility and economic evaluations have been defined and agreed; and
 - The proposed approach has been reviewed with BSEE.
- *Develop Remote BOP Pressure Testing Dashboard:*
 - The first iteration of the Dashboard build is completed;
 - The Information Technology has been deployed; and
 - Field Trial is underway and will continue into 2016.
- *Develop Processes and Training:*
 - Training material will be developed in 2016, alongside the Field Trial activities.
- *Pilot Deployment:*
 - Delivery of training and commencement in 2016.

The Pilot activities are scheduled to be completed in GoM before the end of 2016.

Overall, progress on the Real-time Remote BOP Pressure Test Monitoring Pilot Project is on track to implement technology enhancements at locations where such enhancements are applicable unless deemed technically unsound or economically infeasible.

Pilot Project Plan 21.2: Real-Time Rig-Site Fluid Monitoring

The following section describes the specifics of Real-Time Rig-Site Fluid Monitoring Pilot Project Plan.

Purpose:	Integrates real-time data and processes to trend and provide early warning indicators for potential lost circulation and well control events during well construction.
Target Pilot Start Date:	4Q 2015
Proposed Location:	Gulf of Mexico, Deepwater Drilling Rig West Capricorn
Collaboration Partner:	Kongsberg Oil & Gas Technologies Inc.
Cost to Pilot:	~\$10 million

In 2013, BXPX proposed the development of a real-time rig-site fluid monitoring technology, aimed at identifying parameters, which may be indicative of developing well control or lost circulation events. The overall project objective was to improve the ability to monitor Pore Pressure and Fracture Gradient (PPFG) in real-time against the well parameters in order to provide potential early warning indicators of lost circulation and well control events on deepwater drilling rigs.

The primary objectives of the associated Rig-Site Fluid Management Console are:

- Reduce the number of well control and lost circulation events and thereby enhance operational safety.
- Enhance the ability to monitor PPFG data in real-time against the pre-well prediction to identify where there is a risk that an influx might enter the wellbore or a lost circulation event may occur.
- Amplify the weak signals of any impending change in PPFG to enable personnel to make timely decisions that may avert a lost circulation or well control event.
- Enhance visibility and shared situational awareness of real-time PPFG data between the office and offshore and between the subsurface and wells communities.
- Aid learning and provide consistency for planning and executing well construction.

Status of the key activity areas planned for 2015 are as follows:

- *Develop technical feasibility testing procedures* and *Develop economic evaluation procedures* are completed:
 - Contracts have been agreed with an independent third party;
 - Parameters and metrics for both the technical feasibility and economic evaluations have been defined and agreed; and
 - The proposed approach has been reviewed with BSEE.
- *Develop Rigsite Fluid Monitoring Console* activities have completed:
 - Console build, initial testing Information Technology deployment, and Field Trial commencement are complete.

-
- *Develop Processes and Training* has commenced:
 - Training material is completed; and
 - Operational Decision Making framework definition has commenced.
 - *Pilot Deployment* has commenced:
 - Training has been delivered and the pilot has commenced; and
 - Monitoring use of the console has commenced.

The Real-time Rig-Site Fluid Monitoring Pilot Project is on track to implement technology enhancements at locations where such enhancements are applicable, unless deemed technically unsound or economically infeasible.



BPXP Plea Agreement

2015

**Annual Progress Report
Other Safety Technology Development
(Paragraph 22)**

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Other Safety Technology Development

In 2013 and 2014, BPXP submitted proposals to the Bureau of Safety and Environmental Enforcement (BSEE) for three Pilot Projects regarding the development of new technologies in one or more of the following categories:

1. Enhancing functionality, intervention, testing, and activation of blowout preventer (BOP) systems;
2. Enhancing well design; or
3. Enhancing real-time monitoring on rig and onshore.

On September 20, 2013, the first Pilot Plan, entitled "BOP Health Monitoring", was submitted to the BSEE for approval. On February 17, 2014, BPXP submitted plans to BSEE for two further Other Safety Technology Pilot Projects. These Pilot Projects are described below. These technologies are designed to enhance operational safety with respect to deepwater drilling.

Pilot Project Plan 22.1: Blowout Preventer (BOP) Health Monitoring aims to provide real-time information diagnostics on the availability of various BOP functions and BOP positions.

Pilot Project Plan 22.2: Cement Placement Monitoring aims to integrate real-time data, BP global practices, and process to assure well barrier placement.

Pilot Project Plan 22.3: Early Kick Detection aims to leverage mathematical- and physics-based modeling techniques for the purposes of detecting influx occurrences more quickly than current oil industry technologies.

On May 30, 2014, BSEE formally approved all three proposed Pilot Plans for Other Safety Technology Projects.

22.1 Measures Taken to Comply

In 2014 and early 2015, BPXP submitted a Request for Proposal (RFP) to several universities and research institutes to conduct the independent third party feasibility and economic evaluation for these projects. On July 21, 2015, a contract was awarded to conduct an independent third party technical feasibility and economic evaluation of each project.

The 2015 status of the three Pilot Project Plans is described below.

Pilot Project Plan 22.1: Blowout Preventer (BOP) Health Monitoring

The following section describes the specifics of the Blowout Preventer (BOP) Health Monitoring Pilot Project Plan.

Purpose:	Create a Dashboard that simplifies complex BOP diagnostics into a single screen of BOP health and positions
Target Pilot Start Date:	2Q 2014
Proposed Location:	Gulf of Mexico, Deepwater Drilling Rig DS-3
Collaboration Partner:	Kongsberg Oil & Gas Technologies Inc.
Cost to Pilot:	~\$10 million

In 2013, BPXP proposed the development of technology for a new BOP health monitoring system, which will present simple graphical diagnostics in the form of traffic lights and BOP positions to the users.

The project commenced full pilot stage on one Gulf of Mexico deepwater drilling rig in April 2014. This pilot supports National Oilwell Varco (NOV) BOPs (Multiplexer (MUX)-based only). If successful, later developments are planned to extend the functionality or enhancements to General Electric and Cameron BOPs under additional pilots.

The primary goal of the BOP health monitoring technology is to create a Dashboard that simplifies complex BOP diagnostics into a single screen of BOP health and ram positions. The technology aims to improve communication between onshore and offshore operations personnel and BOP technical specialists, facilitating risk assessments and operational decision-making in response to BOP issues.

The objectives of this remote BOP health monitoring system are:

- The interpretation of complex BOP data.
- Sending alarms and event data back to shore.

Status of the key activity areas planned for 2015 is as follows:

- *Develop feasibility testing procedures* and *Develop economic evaluation procedures* are completed:
 - Contracts have been agreed with an independent third party;
 - Parameters and metrics for both the feasibility and economic evaluations have been defined and agreed; and
 - The proposed approach has been reviewed with BSEE.
- *Pilot Deployment* has been completed.
- With respect to the *Final Report*:
 - Independent technical and economic feasibility tests have commenced.

The progress on the BOP Health Monitoring Pilot Project is on track to implement technology enhancements at locations where such enhancements are applicable unless deemed technically unsound or economically infeasible.

Pilot Project Plan 22.2: Cement Placement Monitoring

The following section describes the specifics of the Cement Placement Monitoring Pilot Project Plan.

Purpose:	Develop a console that monitors in real-time the cement placement operation and provides the criteria for verification of cement well barrier elements isolating the annulus.
Target Pilot Start Date:	1Q 2016
Proposed Location:	Gulf of Mexico, Deepwater Drilling Rig (to be confirmed)
Collaboration Partner:	Kongsberg Oil & Gas Technologies Inc.
Cost to Pilot:	~\$10 million

In 2014, BPXP proposed the development of a real-time cement placement monitoring technology aimed at interpreting and documenting cement placement on deepwater rigs in the Gulf of Mexico. The primary objectives of the Cement Placement Console are to integrate real-time data with BP global practices and processes to assure well barrier placement verification during primary cementing operations by:

- Providing standardized methodology for executing and evaluating cementing operations.
- Displaying pressure signature, stage of operation, cement quality and top of cement position in real-time.
- Automatically estimating cement placement at the end of cementing operations.
- Displaying design criteria versus actual execution parameters.
- Identifying the potential for non-conformance with the BP Group Practice on zonal isolation.
- Providing a repository for Cementing Job Execution and Evaluation data.
- Providing a standard interface for onshore engineers, Well Site Leaders, and other interested stakeholders to monitor cement placement operations simultaneously, regardless of location. This provides data that are generally only available to rig site personnel to a much wider audience using web-enabled technology.
- Aiding learning and providing consistency for planning and executing well construction.
- Supporting continuous improvement, enabling use of lessons learned from previous cementing jobs to proactively enhance future cementing operations.
- Monitoring lost circulation during cement job – important in determining top of cement accurately.
- Displaying real-time comparisons of Equivalent Circulating Density) against Pore Pressure and Fracture Gradient (PPFG) and real-time flow out versus rig flow out sensor.

Status of the key activity areas planned for 2015 is as follows:

- *Develop feasibility testing procedures* and *Develop economic evaluation procedures* are completed:
 - Contracts have been agreed with an independent third party;
 - Parameters and metrics for both the feasibility and economic evaluations have been defined and agreed; and
 - The proposed approach has been reviewed with BSEE.
- *Implement Dashboard* software design and *Develop Processes and Training* activities have been completed for an early version of the console:
 - Field Trials have commenced for the remaining functionality.
- With respect to *Pilot Deployment*:
 - An initial Pilot of an early version of the console was completed in the North Sea. The remaining functionality will be piloted in GoM in 2016.

The Cement Placement Monitoring Pilot Project is on track to implement technology enhancements at locations where such enhancements are applicable unless deemed technically unsound or economically infeasible.

Pilot Project Plan 22.3: Early Kick Detection

The following section describes the specifics of the Early Kick Detection (EKD) Pilot Project Plan.

Purpose:	To develop a monitoring system in order to detect an influx in near real-time based upon statistical analysis and integration of the wellbore hydraulic model with well bore and real-time data.
Target Pilot Start Date:	Pilot start date estimated: 1Q 2016
Proposed Location:	Gulf of Mexico, Houston Monitoring Center (HMC)
Collaboration Partner:	University of Texas
Cost to Pilot:	~\$7m

In 2014, BPXP proposed the development of an early kick detection system. BPXP formed an integrated project team with BP resources and University of Texas at Austin for delivery of the project. The overall project objective is to improve the speed at which an influx or 'kick' can be identified during deepwater drilling operations. Faster identification of an influx increases the amount of time personnel have to act (e.g. shut in the well) in order to reduce operational risk from the kick.

Status of the key activity areas planned for 2015 are as follows:

- *Develop feasibility testing procedures* and *Develop economic evaluation procedures* are completed:
 - Contracts have been agreed with an independent third party;
 - Parameters and metrics for both the feasibility and economic evaluations have been defined and agreed; and
 - The proposed approach has been reviewed with BSEE.
- *Develop Early Kick Detection System* has commenced with the following activities:
 - Testing of the models was performed with real time data in conjunction with the Houston Monitoring Center to test the robustness of the approach;
 - The algorithms were refined to address operating in real-time and for applicability during certain rig operations. This work will continue in 2016;
 - Field trial of clamp on flow meters for inclusion of additional data streams in the models has commenced and will continue in 2016; and
 - Work has commenced on robust code to support partner evaluation for commercial deployment, and will continue in 2016.

Progress on the Early Kick Detection Pilot Project is on track to implement technology enhancements at locations where such enhancements are applicable unless deemed technically unsound or economically infeasible.

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BPXP Plea Agreement

2015

**Annual Progress Report
Transparency
(Paragraph 23)**

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Transparency

BPXP has created and maintains a public website where the following information is communicated:

- Lessons learned from the Deepwater Horizon incident;
- Annual progress reports summarizing BPXP's compliance with Paragraphs 5 through 31 of the Remedial Order;
- Annual summaries of recordable safety incidents, days away from work, hydrocarbon spills and the volume thereof; and
- An annual list of all incidents of non-compliance (INC) with the Bureau of Safety and Environmental Enforcement (BSEE) or the Bureau of Ocean Energy Management (BOEM) regulations, or with probation for which BPXP is cited, including corrective actions taken and penalties assessed.

The BPXP public website is found at the following link:

<http://www.bpxpcompliancereports.com>

The website was active and available on April 22, 2013. In 2015, there were in excess of 250,000 total hits to the BPXP public website. The public website contains the following *Lessons Learned* documents:

- a. *Deepwater Horizon Containment and Response: Harnessing Capabilities and Lessons Learned*;
- b. *Deepwater Horizon Accident Investigation Report*; and
- c. Presentation slides on *Advancing Global Deepwater Capabilities*.

The presentation slides on *Advancing Global Deepwater Capabilities* were updated and revised in 2015. The current version of the presentation was posted on the public website on June 16, 2015. The other documents were not revised or updated in 2015. Updates will be posted when available.

The Annual Progress Reports, incident and spill summaries, and the lists of incidents are posted annually for the previous calendar year no later than March 31 of the following year (except for the 2017 Annual Report, which is due on or before January 28, 2018). Through the end of calendar year 2015, the BPXP Gulf of Mexico operations identified and tracked the following safety and performance metrics for 2015:

- 16 Recordable injuries (no fatalities);
- 9 Days away from work or restricted work cases;
- 12 Hydrocarbon spill reports of sheen of unknown origin;
- 70 Hydrocarbon spills less than one barrel that totaled approximately four barrels in volume;
- 1 Hydrocarbon spill greater than one barrel that totaled approximately seven barrels in volume;
- 1 Synthetic oil-based drilling mud seafloor broach;
- 26 Incidents of Non-Compliance with BSEE regulations;
- No Incidents of Non-Compliance with BOEM regulations;
- No Incidents of Non-Compliance with Probation;
- No civil penalties assessed by BSEE for 2015 Incidents of Non Compliance; and
- No civil penalties paid in 2015 for Incidents of Non-Compliance issued by BSEE.

23.1 Measures Taken to Comply

23.1.1 BPXP Public Website

The BPXP Public Website was made available on April 22, 2013. The website is located at the following address:

<http://www.bpxpcompliancereports.com>

23.1.2 BPXP Annual Summary of Recordable Safety Incidents

In 2015, BPXP had 16 safety incidents resulting in injuries that were required to be reported to BSEE under 30 CFR § 250.188(a)(1) or (a)(2). Of the reported safety incidents, none were fatalities. Of these incidents, nine resulted in days away from work or restricted work cases according to 30 CFR § 250.188 (b)(1). A summary of the recordable safety incidents is provided in **Table 23.1** and on the BPXP Public Website at the following address:

<http://www.bpxpcompliancereports.com/go/doctype/5617/151485/>

Table 23.1: 2015 BPXP Gulf of Mexico Recordable Safety Incidents Summary

Recordable Safety Incidents	Days Away from Work Cases or Restricted Work Cases Resulting from Recordable Safety Incidents
16	9

Notes: 1. "Recordable Safety Incident" is defined to mean any incident that is required to be reported under 30 CFR 250.188 (a)(1) or (a)(2). 30 CFR 250.188 (a)(1) includes the reporting of fatalities. There were no fatalities on BPXP facilities in 2015.
2. Days away from work/restricted work cases means those cases described in 30 CFR 250.188 (b)(1).

An analysis of the 16 injuries shows that 31% were leg or feet injuries, 31% were head or neck injuries, and 19% were pinched fingers. Learnings from incident investigations of the injuries resulted in improvements to equipment design, increased rigor in risk assessments, and new or revised work procedures.

23.1.3 BPXP Annual Summary of Hydrocarbon Spills and the Volume Thereof

In 2015, BPXP reported to the National Response Center (NRC) and/or to BSEE hydrocarbon spills (including contractor reported spills) that were required to be reported under 30 CFR § 254.46(a) or (b). Twelve of the spills were reported as sheens of unknown origin in accordance with 30 CFR § 254.46(a)(3). No volume amount has been allocated for sheens of unknown origin. There were 70 hydrocarbon spill incidents in 2015 that were each under one barrel in volume. There was one spill incident in 2015 greater than one barrel in volume. The total volume of the reported hydrocarbon spill incidents combined was less than eleven barrels. A summary of the hydrocarbon spills and volume thereof is provided in **Table 23.2** and on the BPXP Public Website at the following address:

<http://www.bpxpcompliancereports.com/go/doctype/5617/151485/>

Table 23.2: 2015 BPXP Gulf of Mexico Hydrocarbon Spills Summary

Volume Range	Number of Hydrocarbon Spills*	Total Volume of Hydrocarbon Spills per Category (barrels)*
Sheen of unknown origin:	12	Sheen**
<1 barrel:	70	3.8
≥1 barrel to <10 barrels:	1	6.8
≥10 barrels:	0	0
Total Volume:		10.6

Notes: * Any spill that is required to be reported under 30 CFR 254.46(a) or (b).

**No volume amount is allocated for sheens of unknown origin.

1. "Hydrocarbon" does not include substances that are excluded from the definition of "oil" in 30 CFR 254.6.

2. "Hydrocarbon Spills" does not include federally permitted releases or spills of hazardous substances otherwise reportable to the National Response Center under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

In addition to the hydrocarbon spills, BPXP reported to the NRC and BSEE one seafloor broach of synthetic oil-based drilling mud that migrated to the seafloor either through unobserved natural fractures or low strength soils. The volume of material released is not known; the area of seafloor over which the release was observed was slightly less than 0.2 acres.

23.1.4 BPXP Annual List of Incidents of Non-Compliance

In 2015, BPXP had no Incidents of Non-Compliance with Probation, no Incidents of Non-Compliance with BOEM regulations, and 26 Incidents of Non-Compliance with BSEE regulations. For the INCs issued in 2015 by BSEE, no civil penalties have been assessed to BPXP as of December 31, 2015. In April 2015 BPXP received from BSEE a rescission of one of the 2014 INCs. A list of the 26 INCs issued to BPXP from BSEE in 2015 along with the associated corrective actions and penalties assessed are provided in **Table 23.3** and on the BPXP Public Website at the following address:

<http://www.bpxpcompliancereports.com/go/doctype/5617/151489/>

Table 23.3: 2015 BPXP List of Incidents of Non-Compliance (INCs) with BSEE Regulations

Date Received	BSEE PINC Number*	BSEE PINC Statement*	Authority 30 CFR § 250.	Corrective Actions Taken	Penalty Assessed (If Applicable)
01/08/2015**	L-821	Has the lessee or the right of way holder reported a pipeline taken out of service to the Regional Supervisor?	1008(c)	The following corrective action has been completed in order to provide clarity on the status of BPXP's pipelines: <ul style="list-style-type: none"> BPXP has enhanced its pipeline in-service/out-of-service tracking and BSEE reporting procedures. 	N/A
01/08/2015**	L-141	Are pipelines out of service for more than 1 year (365 calendar days), flushed and filled with inhibited seawater?	1006(b)(2)	The following corrective action has been completed in order to provide clarity on the status of BPXP's pipelines: <ul style="list-style-type: none"> BPXP has enhanced its pipeline in-service/out-of-service tracking and BSEE reporting procedures. 	N/A
01/30/2015	D-285	Did the BOP systems pressure testing begin before 14 days had elapsed since the last BOP test, alternative between control stations and pods?	449(c)	The following corrective action has been completed in order to provide clarity on the procedures for BOP system testing: <ul style="list-style-type: none"> BPXP onshore management discussed the INC with BP and the drilling contractor offshore personnel to re-emphasize regulatory compliance expectations associated with alternating stations and pods during BOP pressure tests. BPXP onshore management reinforced the use of BP frequency based tests and drills compliance tracking tools by the BP offshore personnel. 	N/A
03/24/2015**	P-423	Is each pressure vessel equipped with an operable LSL (oil)?	802(b)	The following corrective action has been completed in response to the glycol contactor Level Safety Low (LSL) not activating as required during inspection: <ul style="list-style-type: none"> The maintenance team successfully recalibrated and tested the glycol contactor LSL during the inspection. 	N/A
03/24/2015**	P-404	Is the PSL on each flowline segment set no lower than 15% or 5 psi, whichever is greater, below the lowest pressure in the operating range?	803(b)	The following corrective action has been completed in response to the Pressure Safety Low (PSL) on well #6 FA2 not activating as required during inspection: <ul style="list-style-type: none"> The master procedure has been revised to reflect the changes made to the PSL set point so that it could operate at a lower pressure. 	N/A
03/27/2015**	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	300(c)	BPXP believes that the discharge was within the facility's federally permitted discharge of produced water. Therefore, no corrective action was proposed.	N/A
03/27/2015**	L-102	Is each pipeline pump equipped with an operable PSV?	1004(b)(9)	The following corrective action has been completed in response to Pressure Safety Valve (PSV) on PAX-240 not testing as required during inspection: <ul style="list-style-type: none"> The maintenance team replaced and successfully tested the PSV on PAX-240 on 03/31/2015. 	N/A
03/27/2015**	L-102	Is each pipeline pump equipped with an operable PSV?	1004(b)(9)	The following corrective action has been completed in response to PSV on PAX-250 not testing as required during inspection: <ul style="list-style-type: none"> The maintenance team replaced and successfully tested the PSV on PAX-250 on 03/31/2015. 	N/A
03/27/2015**	P-341	Is each non-pipeline pump equipped with a PSL?	802(b)	The following corrective action has been completed in response to PSL on PBA-202 not activating as required during inspection: <ul style="list-style-type: none"> BPXP believes that the test results were within the required test tolerance. Therefore, no corrective actions were proposed. 	N/A

Date Received	BSEE PINC Number*	BSEE PINC Statement*	Authority 30 CFR § 250.	Corrective Actions Taken	Penalty Assessed (If Applicable)
03/27/2015**	P-404	Is the PSL on each flowline segment set no lower than 15% or 5 psi, whichever is greater, below the lowest pressure in the operating range?	803(b)(2)	The following corrective action has been completed in response to PSL on FA-2 segment of Coulomb failed to activate within test tolerance during inspection. <ul style="list-style-type: none"> The maintenance team recalibrated and successfully tested the PSL on FA-2 segment of Coulomb and successfully tested on 03/27/2015. 	N/A
03/31/2015**	G-111	Does the lessee maintain all equipment in a safe condition to provide for the protection of the lease and associated facilities?	107	The following corrective action has been completed in response to identified damage to heat wrap protecting piping operating above 200 degree F from PBA-581. <ul style="list-style-type: none"> Insulation was added to the heat wrap and secured on 04/07/2015. 	N/A
03/31/2015**	G-112	Does the lessee provide for the safety of all personnel and take all necessary precautions to correct and remove any hazardous oil and gas accumulation or other health, safety, or fire hazards?	107	The following corrective action has been completed in response to identified trip hazard located at panel IBJ-1310 A: <ul style="list-style-type: none"> The grating that resulted in the trip hazard was replaced on 04/01/2015. 	N/A
03/31/2015**	G-250	Are all loose materials, small tools, and other small objects kept in a suitable storage area or a marked container when not in use?	300(c)(1)	The following corrective action has been completed in response to identified loose trash/debris on deck located next to MBD-554 with no active work/repairs in the area. <ul style="list-style-type: none"> The trash/debris was removed on 03/31/2015. 	N/A
03/31/2015**	G-115	Are operations conducted in accordance with approved applications?	107(a)(2)	The following corrective action has been completed in response to the PSL protecting ABJ-310 failed to activate within allowed test tolerance. <ul style="list-style-type: none"> The pressure transmitter failed resulting in the inability to achieve the low set point. The transmitter was replaced and the device was successfully tested on 03/31/2015. 	N/A
03/31/2015**	P-341	Is each non-pipeline pump equipped with a PSL?	802(b)	The following corrective action has been completed in response to PSL protecting PBA-555 not activating as required during inspection: <ul style="list-style-type: none"> BPXP believes that the test results were within the required test tolerance. Therefore, no corrective actions were proposed. 	N/A
04/22/2015	G-112	Does the lessee provide for the safety of all personnel and take all necessary precautions to correct and remove any hazardous oil and gas accumulation or other health, safety, or fire hazards?	107	The following corrective actions were completed to address an oil accumulation under both #1 and #2 starboard engines: <ul style="list-style-type: none"> Daily inspection and cleanup of the engine rooms and drip pans by the offshore personnel with the use of a daily checklist. Leaking O-rings were replaced and a new supplier was sourced. 	N/A

Date Received	BSEE PINC Number*	BSEE PINC Statement*	Authority 30 CFR § 250.	Corrective Actions Taken	Penalty Assessed (If Applicable)
05/07/2015	D-121	Is the movement of all drilling units on and off location reported to the district manager 24 hours prior to the movement, including the rig name, lease number, well number, and the expected time of arrival or departure?	403	After discussion with BSEE District and Region Personnel, BSEE affirmed that rig move notifications are not required when moving to the safe zone during operations. No corrective action proposed.	N/A
07/30/2015**	M-200	Is the gas measuring equipment installed and operated in accordance with the recommendations contained in API MPMS, as incorporated by reference in 30 CFR 250.198?	1203(b)(2)	The following corrective action has been completed in response to proper conduct of gas sales meter #1 static verification tests per regulation: <ul style="list-style-type: none"> BPXP printed an amended July 11, 2015 verification test results conducted on the six required test points and placed a copy in the representative file to document that the required tests were completed as required. 	N/A
07/30/2015**	M-200	Is the gas measuring equipment installed and operated in accordance with the recommendations contained in API MPMS, as incorporated by reference in 30 CFR 250.198?	1203(b)(2)	The following corrective action has been completed in response to proper conduct of gas sales meter #2 static verification tests per regulation: <ul style="list-style-type: none"> BPXP printed an amended July 11, 2015 verification test results conducted on the six required test points and placed a copy in the representative file to document that the required tests were completed as required. 	N/A
07/30/2015**	M-305	Are sampling systems, including packing devices, fittings, sight glass, and container lids, sealed in such a manner that tampering cannot occur without destroying the seal?	1205(b)(1)(i)	The following corrective action has been completed in response to Sample Pot MBD-221 lid not adequately sealed as required during inspection: <ul style="list-style-type: none"> Sample Pot MBD-221 lid was adequately secured to mitigate the risk of tampering. 	N/A
07/30/2015**	M-305	Are sampling systems, including packing devices, fittings, sight glass, and container lids, sealed in such a manner that tampering cannot occur without destroying the seal?	1205(b)(1)(i)	The following corrective action has been completed in response to Sample Pot MBD-222 lid not adequately sealed as required during inspection: <ul style="list-style-type: none"> Sample Pot MBD-222 lid was adequately secured to mitigate the risk of tampering. 	N/A
07/30/2015**	M-305	Are sampling systems, including packing devices, fittings, sight glass, and container lids, sealed in such a manner that tampering cannot occur without destroying the seal?	1205(b)(1)(i)	The following corrective action has been completed in response to Sample Pot MBD-223 lid not adequately sealed as required during inspection: <ul style="list-style-type: none"> Sample Pot MBD-223 lid was adequately secured to mitigate the risk of tampering. 	N/A

Date Received	BSEE PINC Number*	BSEE PINC Statement*	Authority 30 CFR § 250.	Corrective Actions Taken	Penalty Assessed (If Applicable)
11/12/2015**	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	300	In order to prevent losses of synthetic oil based mud (SOBM), BPXP has implemented the following corrective actions: <ul style="list-style-type: none"> BPXP management reiterated to the organization to consider and take remedial actions as appropriate when large volumes of fluid are lost to the wellbore below shallow mud-line penetrations; e.g., reduce pump rates, consider casing run speed parameters, monitor seabed. 	N/A
11/12/2015**	G-110	Does the lessee perform all operations in a safe and workmanlike manner and provide for the preservation and conservation of property and the environment?	107(a)	BPXP believes that appropriate actions consistent with accepted and approved industry practices were taken to evaluate mud losses and perform corrective actions during these well operations.	N/A
11/23/2015	D-425	Are all classified drilling fluid-handling areas fitted with gas detectors and alarms except in open areas where adequate ventilation is provided by natural means?	459(b)	In order to address a gas detector not activating as required during inspection, BPXP has implemented the following corrective actions: <ul style="list-style-type: none"> BPXP reviewed the gas detector configuration in the shaker area and confirmed the adequacy of the number and placement of gas detectors. All other gas detectors in the shaker area were also tested and found to be functioning normally. The maintenance team recalibrated the gas detector and achieved a (high, high) alarm. 	N/A
12/15/2015	G-811	Is required paperwork submitted in the time frame required for all activities or operations as specified by regulations?	140	To address timely submission of revised permits, BPXP has taken the following corrective action: <ul style="list-style-type: none"> Once verbal approval is received from BSEE after-hours or over a weekend, a task reminder will be created by the regulatory advisor to create the appropriate revised permit on the next business day. 	N/A

Notes: * A further description of the Potential Incident of Non-Compliance (PINC) issued by BSEE by the PINC number can be found at the following website:

<http://www.bsee.gov/Inspection-and-Enforcement/Enforcement-Programs/Potential-Incident-of-Noncompliance--PINC/>.

**Multiple INCs were issued by BSEE during one inspection.

- "INC" refers to Incident of Non-Compliance, which is a notice of alleged violation(s) of BSEE or BOEM regulations that is issued to BPXP.
- The table does not include one INC that was issued and rescinded by BSEE in 2015.

Acronyms:

BOP	Blow Out Preventer
BSEE	Bureau of Safety and Environmental Enforcement
CFR	Code of Federal Regulations
F	Fahrenheit
LSL	Level Safety Low
N/A	Not Applicable
psi	Pounds per square inch
PSL	Pressure Safety Low
PSV	Pressure Safety Valve (pressure relief valve)
SOBM	Synthetic Oil Based Mud

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BPXP Plea Agreement

2015

Annual Progress Report Rig Equipment - Two Blind Shear Rams (Paragraph 24)

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Rig Equipment - Two Blind Shear Rams

BPXP has ensured that all applicable rigs are equipped with the appropriate blind shear ram (BSR) configuration. All dynamically positioned Drilling Rigs with subsea blowout preventers (BOPs) are equipped with no fewer than two blind shear rams and a casing shear ram. In addition, all moored Drilling Rigs with subsea BOPs are equipped with two shear rams, including at least one blind shear ram and either an additional blind shear ram or a casing shear ram.

24.1 Measures Taken to Comply

The subsea shear ram configuration identified above for all such Drilling Rigs was verified throughout 2015, during the third party BOP verification process and recorded. Additionally, throughout 2015, each Application for Permit to Drill (APD) submitted to the Bureau of Safety and Environmental Enforcement (BSEE) for Deepwater Drilling Operations included the appropriate shear ram commitment.

24.2 Certifications

24.2.1 APDs for Dynamically Positioned Rigs

BPXP Certified that all BPXP Applications for Permits to Drill submitted in 2015 for dynamically positioned Drilling Rigs under contract to BPXP for Deepwater Drilling Operations included a commitment that such Drilling Rigs will use subsea BOPs equipped with no fewer than two blind shear rams and a casing shear ram.

24.2.2 Two Blind Shear Rams on Dynamically Positioned Rigs

BPXP Certified in 2015 that all BPXP Deepwater Drilling Operations with a dynamically positioned Drilling Rig have a subsea BOP equipped with no fewer than two blind shear rams and a casing shear ram.

24.2.3 APDs for Moored Rigs

BPXP Certified that all BPXP Applications for Permits to Drill submitted in 2015 for moored Drilling Rigs under contract to BPXP for Deepwater Drilling Operations include a commitment that such Drilling Rigs will use subsea BOPs equipped with two shear rams, including at least one blind shear ram and either an additional blind shear ram or a casing shear ram.

24.2.4 Two Blind Shear Rams on Moored Rigs

BPXP Certified in 2015 that all BPXP Deepwater Drilling Operations with a moored Drilling Rig for Deepwater Drilling Operations include a subsea BOP equipped with two shear rams, including at least one blind shear ram and either an additional blind shear ram or a casing shear ram.

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BPXP Plea Agreement

2015

**Annual Progress Report
Safety Organization
(Paragraph 25)**

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Description of Safety Organization

In 2015, BPXP continued to empower its employees and contractors to intervene or stop any work that is perceived as unsafe. BPXP communicated this expectation via training, leadership discussions and its written Code of Conduct, which states:

“Stop work, your own or others’, if you consider it unsafe...Speak up if you observe an unsafe or unhealthy working environment. Listen to others who speak up.”

BPXP employees certified that they behaved in accordance with the Code of Conduct, and Contractors were encouraged in orientation training and through their BPXP supervision to speak up and stop unsafe acts. BPXP provided the normal avenues for reporting through managers, legal, and human resource representatives or compliance and ethics officers. BPXP also continued to offer “OpenTalk”, a 24 hours a day, 7 days a week hotline to enable employees and contractors to raise concerns. As in 2014, OpenTalk was administered by an independent company. BP maintains a zero tolerance policy on retaliation against the personnel who report through OpenTalk.

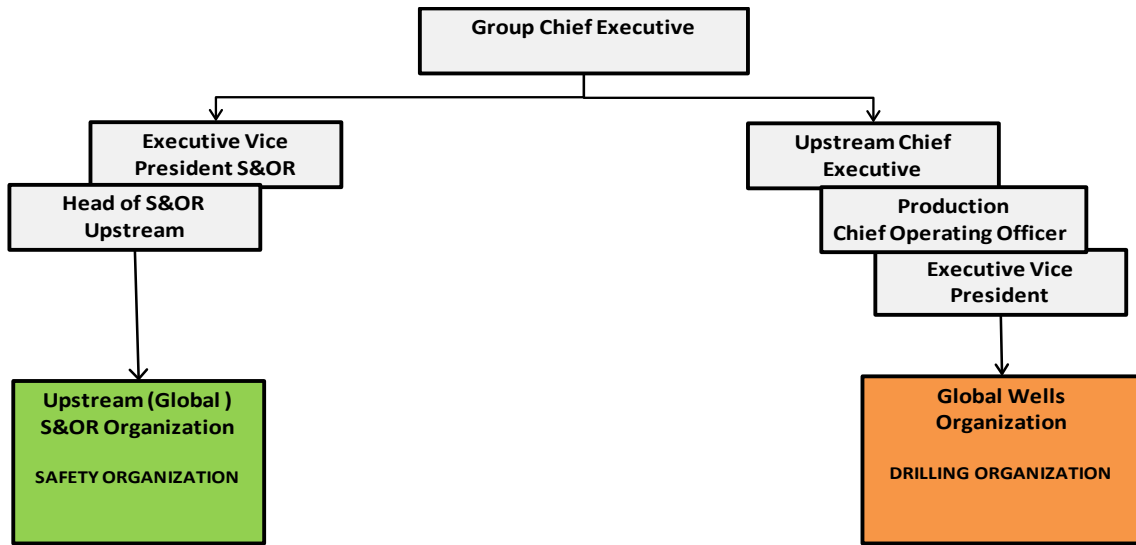
In addition to the universal authority given to all personnel to stop unsafe work, BPXP continued to maintain an independent Safety Organization with formal authority to assess risk and to intervene or stop any operation it deems unsafe. The Safety Organization is defined as the Gulf of Mexico Region and Global Wells teams within BP’s Global Safety and Operational Risk Organization (S&OR). **Figure 25.1** depicts the independence of the Safety Organization (highlighted in green) from the operating function for the Global Wells Organization (highlighted in orange).

25.1 Measures to Comply

In 2015, BPXP’s efforts to create awareness and encourage personnel to intervene and stop unsafe work activity included:

- Maintaining a Safety Organization that has the authority to intervene or stop any operation that it deems unsafe.
- Updating a document describing its reorganized Safety Organization for Deepwater Drilling Operations.
- Maintaining registers, tools, and processes for gathering, documenting, monitoring, and improving the communication of intervened or stopped operation events and any major new safety-related requirements published by the Safety Organization.

Figure 25.1: Safety Organization (green) and Drilling Organization (orange)



Upstream S&OR Organization

What they do:

- Setting or supporting the development of requirements
- Assuring compliance with requirements
- Form independent view of risk
- Provide deep technical expertise in the areas of S&OR
- Intervene if needed

Staff includes:

- Engineering technical experts
- Operational experts
- Health, safety, environment and regulatory compliance experts to provide oversight and assurance

Global Wells Organization (Drilling)

What they do:

- Deliver safe, reliable compliant operations
- Develop and implement the requirements

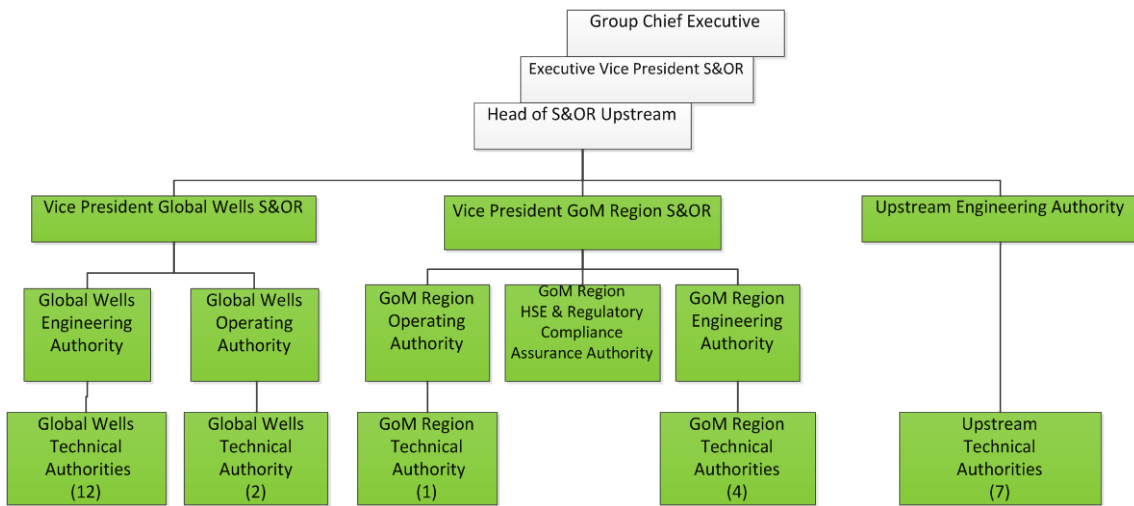
Staff includes:

- Drilling operations
- Engineering
- Health, safety, environment, and regulatory compliance day to day support
- Maintenance and inspection

25.2 Numbers and Qualifications of Personnel

At the end of 2015, the Safety Organization consisted of 34 professionals in the roles highlighted in the green boxes in **Figure 25.2**.

Figure 25.2: Safety Organization (green) Details - 2015



Each of these professionals in the Safety Organization possess more than 10 years of experience in one or more of the fields relating to Health, Safety, Environment, Engineering and Operations. These personnel hold engineering or other technical degrees and may hold licenses from professional organizations which prescribe continuing education requirements. Many members of the Safety Organization came from the operating teams and have deep knowledge and understanding of the drilling business and risks. These personnel provide guidance and coaching to the operating teams to improve the health of the operations.

25.3 Summary of Safety Organization's Work - 2015

While the operating function for the Global Wells Organization retained accountability for delivering safe, reliable, and compliant operations, the Safety Organization maintained its independent view of risk and provided technical expertise to the drilling organization for:

- Setting or supporting the development of requirements;
- Providing technical expertise to drilling operations for implementation of requirements;
- Assuring compliance with requirements, and;
- Intervening and escalating as appropriate to cause corrective action.

In 2015, the Safety Organization worked with the Global Wells Organization to revise and/or support the publication of 15 major requirements to address personal and process safety risks for well operations. These requirements were developed with input from the Global Wells Drilling Organization while considering the learnings from incidents, audit findings, regulatory changes, and any identified gaps in BXP's operating management system.

25.4 Stopping or Intervening Work

BPXP employs several mechanisms to check work activity for compliance with safety requirements. **Table 25.1** describes some of these mechanisms.

In 2015, BPXP Employees, Contractors and the Safety Organization intervened or stopped work by exercising one or more of the mechanisms in **Table 25.1**. The stops occurred most frequently at offshore locations when personnel were preparing for a job, or when unexpected changes occurred while doing a job. The employees and contractors in the Global Wells Drilling Organization most frequently used behavior based safety observations, pre-job risk assessments and hazard identification as the mechanisms for intervening or stopping a job. On the other hand, the Safety Organization applied most of their interventions or work stoppages during the design and planning phases and when conducting inspections and reviews offshore.

For operating year 2015, BPXP is providing 103 stop work examples to BSEE to demonstrate when BPXP employees, contractors and the Safety Organization stopped work and how BPXP responded to these events. The examples came from all of BPXP's contracted drilling rigs and were typical representations of the organization's conduct for drilling operations.

BPXP shared key work stoppage events and any lessons learned locally, at the site where the event occurred. Where applicable, BPXP also shared the lessons learned and corrective actions with similar BPXP facilities in the region. BPXP responded to the work stoppages with one or more of the actions below:

- Mentoring and training for personnel;
- Reconfiguring and simplifying work areas;
- Revising risk assessments and procedures; and
- Re-designing equipment, tools or process to remove defects.

Table 25.1: Stop Work Mechanisms

Stop Work Mechanism	Description	Work Activity
Houston Monitoring Center (HMC)	The HMC is used to remotely monitor drilling operations and watch for excursions from safe operating limits. The HMC personnel have the authority and expectation to escalate on abnormal parameters which could result in unsafe situations. These reports can result in an intervention which may lead to further action.	
Simultaneous Operations (SIMOPS) Plan	SIMOPS is defined as conducting two or more independent operations in which the events of any one operation may impact the safety of personnel or equipment or the environment of another operation being conducted at the same time. This could involve any combination of production operations, drilling operations and or project execution operations, and includes any incidence where concurrent operations create risk. During these operations, personnel have the opportunity to intervene or stop work	Planning/ Oversight

Stop Work Mechanism	Description	Work Activity
Rig Assessments	Rig Assessments are conducted by BPXP's Rig Audit Group to assure that a rig can operate safely. Observations from Rig Assessments can result in interventions or stopped work.	Assurance
Rig Inspections	Rig Inspections are conducted by Onshore Supervisors or members of the Safety Organization to verify the strength of barriers to a potential major accident risk. The observations from inspections provide opportunities to assess implementation of requirements and to stop or intervene on unsafe work practices.	
Hazard Identification	Hazard Identification/Hazard Operability studies are performed prior to operating new builds, carrying out well intervention operations and for certain activities involving live hydrocarbons, for e.g. Well Testing. These studies are used to identify potential safety, environmental and operability risks. The risks identified in studies can result in interventions with projects to mitigate risk, or in stopped work.	Risk/Hazard Identification
Hazard Operability Study		
Job Task Risk Assessment (JTRA)	Job Task Risk Assessments (JTRA) are used by employees and contractors prior to commencing a job. A JTRA form is used to identify hazards associated with job tasks, assess potential risks and determine methods of control or mitigation for risks, including "stopping the job" altogether.	
Eliminating Accidents Starts With You (EASY) Observations	Eliminating Accidents Starts With You (EASY) is a peer-to-peer program which is intended to empower the workforce to recognize positive and at-risk behaviors with the authority to stop work. Employees and contractors on BPXP owned facilities observe personnel performing work activities, identify at-risk behaviors, then stop work, or intervene to discuss safe solutions for the task at hand.	Behavior Based Safety
Safety Observation Conversations (SOC)	The Safety Observation Conversation (SOC) is a program used by site leaders and safety professionals on offshore BPXP owned facilities and contracted drilling rigs. The SOC leader observes work activities and holds conversations with workers to test their understanding of the safety procedures, risk assessments and controls pertinent to the job at hand. During the SOC, the leader may intervene or stop work if deficiencies are noted.	
Control of Work (CoW)	On oil and gas facilities where multiple tasks are performed simultaneously, the management of work is essential to ensure that these tasks are accomplished safely. CoW procedures establish a formal approach for personnel to effectively and systematically manage and reduce risk to which workers are exposed. During these operations, personnel have the opportunity to intervene or stop work.	Standard Operating Procedures
Go/No Go	The Go/No Go process is a final check before certain operations to confirm that all requirements of safe start-up have been met.	

Stop Work Mechanism	Description	Work Activity
Contractor Selection and Retention	Prior to beginning work, the Contractor's operating management system for health, safety and environment (HSE) is assessed to ensure it is consistent with or exceeds BPXP's requirements. Contractor HSE performance is evaluated on an on-going basis and interventions made if gaps are found or performance deteriorates.	Contractual Expectations
Contractor Bridging Documents	Contractor Bridging documents are used to compare BPXP and Contractor safety, health and environmental work practices and define the hierarchy of procedures for use. As part of this process, if the Contractor's Stop Work Authority program does not meet the intent of BP's Stop Work Authority program, additional requirements are documented.	
Competency Assessments of Wellsite Leaders	Wellsite Leaders who are responsible for the oversight of drilling operations are assessed on their skills and competence for recognizing, evaluating, responding and remediating well control events. If an individual does not meet the requirements, corrective action is taken to mitigate the risk identified in the assessment.	



BPXP Plea Agreement

2015

**Annual Progress Report
Third Party Auditor
(Paragraphs 26-31)**

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Third Party Auditor

As part of the BXPX Remedial Order, Paragraphs 26 through 31 require BXPX to hire an independent Third Party Auditor to report to BXPX, the Department of Justice (DOJ) and the Probation Officer every year on BXPX's compliance with Paragraphs 5 through 25 of the Remedial Order. The Annual Audit Report is due to the DOJ, Probation Officer, and BXPX on or before August 31 each year during the term of the Plea Agreement.

26-31.1 Measures Taken to Comply

After following a tender and selection process, Grant Thornton LLP (Grant Thornton) was approved by the DOJ in December 2013. Early in 2014, Grant Thornton was contracted by BXPX as the Third Party Auditor. Grant Thornton has since produced two Reports.

In April 2015, Grant Thornton began their formal review process of BXPX's 2014 compliance activities with Paragraphs 5 through 25 of the Remedial Order. Grant Thornton performed 202 independent inquiry and inspection procedures as part of their compliance audit and BXPX was found to have satisfactorily completed each requirement.

Grant Thornton stated in their report for the 2014 calendar year that:

"The results of Grant Thornton's test procedures demonstrate BXPX's compliance with paragraphs 5 through 25 as well as paragraphs 26 through 31 of the Plea Agreement and the related Implementation Plan."

There were no instances of non-compliance identified by Grant Thornton in their August 14, 2015, report for the 2014 calendar year.

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