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## 2015 BPXP Incidents of Non-Compliance Summary

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 1** below.

**Table 1: 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"> <li>BPXP has enhanced its pipeline in-service/out-of-service tracking and BSEE reporting procedures.</li> </ul>	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"> <li>BPXP has enhanced its pipeline in-service/out-of-service tracking and BSEE reporting procedures.</li> </ul>	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"> <li>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.</li> <li>BPXP onshore management reinforced the use of BP frequency based tests and drills compliance tracking tools by the BP offshore personnel.</li> </ul>	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"> <li>The maintenance team successfully recalibrated and tested the glycol contactor LSL during the inspection.</li> </ul>	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"> <li>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.</li> </ul>	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"> <li>The maintenance team replaced and successfully tested the PSV on PAX-240 on 03/31/2015.</li> </ul>	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"> <li>The maintenance team replaced and successfully tested the PSV on PAX-250 on 03/31/2015.</li> </ul>	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"> <li>BPXP believes that the test results were within the required test tolerance. Therefore, no corrective actions were proposed.</li> </ul>	N/A

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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"> <li>The maintenance team recalibrated and successfully tested the PSL on FA-2 segment of Coulomb and successfully tested on 03/27/2015.</li> </ul>	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"> <li>Insulation was added to the heat wrap and secured on 04/07/2015.</li> </ul>	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"> <li>The grating that resulted in the trip hazard was replaced on 04/01/2015.</li> </ul>	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"> <li>The trash/debris was removed on 03/31/2015.</li> </ul>	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"> <li>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.</li> </ul>	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"> <li>BPXP believes that the test results were within the required test tolerance. Therefore, no corrective actions were proposed.</li> </ul>	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"> <li>Daily inspection and cleanup of the engine rooms and drip pans by the offshore personnel with the use of a daily checklist.</li> <li>Leaking O-rings were replaced and a new supplier was sourced.</li> </ul>	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"> <li>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.</li> </ul>	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"> <li>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.</li> </ul>	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"> <li>Sample Pot MBD-221 lid was adequately secured to mitigate the risk of tampering.</li> </ul>	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"> <li>Sample Pot MBD-222 lid was adequately secured to mitigate the risk of tampering.</li> </ul>	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"> <li>Sample Pot MBD-223 lid was adequately secured to mitigate the risk of tampering.</li> </ul>	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"> <li>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.</li> </ul>	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"> <li>BPXP reviewed the gas detector configuration in the shaker area and confirmed the adequacy of the number and placement of gas detectors.</li> <li>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.</li> </ul>	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"> <li>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.</li> </ul>	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