
2013 BPXP Incidents of Non-Compliance

There were no incidents of noncompliance in calendar year 2013 with BOEM regulations or with BPXP's probation under the Plea Agreement.

Please refer to the Table titled *2013 BPXP List of Incidents of Non-Compliance (INCs) with BSEE Regulations* for the details and information specific to the 2013 annual list of incidents of non-compliance with BSEE regulations for which BPXP was cited, including corrective actions taken and penalties assessed.

Table 1: 2013 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)
1/19/2013**	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	300(a)	<ul style="list-style-type: none"> • Discharge dump valves are now labeled and locked in the closed position. • Master dump valve was repaired, the position indicator was corrected and valve was locked in the closed position. • BP actions - Time-Out for Safety and suspended operations to allow for safe investigation. • Rig Contractor actions: <ul style="list-style-type: none"> ○ Safety stand down with rig personnel. ○ Right people in the right place. ○ Follow written work instructions. ○ Be certain of results before touching a valve. ○ Closed the gaps in the Signage and Labeling Procedure. ○ All the discharge dump valves were labeled and locked out. 	N/A
1/28/2013**	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)		N/A
1/28/2013**	G-111	Does the lessee maintain all equipment in a safe condition to provide for the protection of the lease and associated facilities?	107		N/A

Date Received	BSEE PINC Number*	BSEE PINC Statement*	Authority 30 CFR § 250.	Corrective Actions Taken	Penalty Assessed (If Applicable)
2/6/2013**	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	300(a)	<ul style="list-style-type: none"> Replaced valve V4 body and insert in ISS snubbing unit stack and tested same. Revised stripping procedure, including bleed off steps utilizing the manual choke as the primary bleed off device. Generated a revised snubbing unit test procedure (BP controlled document) referencing the revised stripping procedure. Inspected valve V2, similar in position to valve V4, in the ISS snubbing unit stack. Plug and seal were replaced after inspection due to slight wear. Rig personnel will visually inspect 100-bbbl bleed down tank and will radio results every 15 minutes. A maximum of 50-bbbls will be kept in 100-bbbls bleed down tank. Installed splash curtains around 100-bbbls bleed down tank. Inspected snubbing to identify any potential single barriers to pressure. 	N/A
2/6/2013**	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)(1)		N/A
3/21/2013	D-172	Were remedial actions, approved by the district manager, taken if there were indications of an inadequate cementing job?	428, 421	BP ran a cement evaluation log when indicated. BSEE District Manager approval was sought to confirm that no further remedial action was required and the District Manager provided that approval.	N/A
4/25/2013	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, 401(e)	Engines were installed with industry standard drip pans. The OEM design of these engines includes vent lines to direct crank case vapor into the drip pans, which is expected to result in residual oil. Standing orders are in place for engine room personnel on board the rig to check drip pans every twelve hours and "keep main engine containments free of any accumulation of oil, dirt and rags." Following the inspection, the rig crew used absorbent materials to collect the residual oil from the drip pan in question. The estimate of collection was less than 500 milliliters.	N/A
5/10/2013	G-111	Does the lessee maintain all equipment in a safe condition to provide for the protection of the lease and associated facilities?	107(a)(2)	Gate valve stem rotated 90 degrees. Hazard assessment of machinery spaces completed 4/20/13. All crews on board reviewed results of injury investigation and hazard assessment during a safety meeting.	N/A

Date Received	BSEE PINC Number*	BSEE PINC Statement*	Authority 30 CFR § 250.	Corrective Actions Taken	Penalty Assessed (If Applicable)
5/23/2013	L-109	Is each incoming, crossing, and bidirectional pipeline equipped with an SDV immediately upon boarding the platform?	1004(b)(2), 1004(b)(4), 1004(b)(8)	SDV #5203 on P1 riser was repaired and re-tested 5/24/2013. The diverter block valves will be replaced with new actuators with a different vent design to prevent this type of event in the future.	N/A
5/31/2013	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	300(a)	Incident was reviewed with Drill and Maintenance Crews. Procedure was updated. Implemented controls for mud pump relief valve settings.	N/A
5/31/2013	G-111	Does the lessee maintain all equipment in a safe condition to provide for the protection of the lease and associated facilities?	107	Incident was reviewed with Drill and Maintenance Crews. Procedure was updated. Implemented controls for mud pump relief valve settings.	N/A
6/6/2013	P-315	Is each electronic PSL tested for operation every 3 months, with no more than 120 days elapsing between tests?	804(a)(3)(iii)(i)	During the 2013 BSEE annual inspection the inspector identified the PSL was out of service on the SEMP Check paperwork and stated that it should be in service and tested. The SEMP Check information was updated to place the PSL in service. The BSEE inspector witnessed the test. Corrected during BSEE inspection.	N/A
6/11/2013	D-266	Are any problems or irregularities observed during BOP system testing identified and the actions taken to remedy such problems or irregularities recorded?	450(e)	Updated standard procedure to include separate documentation of any failed test and corrective actions on IADC reports (in addition to BOP test charts).	N/A
6/20/2013	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)	Drilling Contractor performed the following items: <ul style="list-style-type: none"> Updated their procedure. Reviewed roles and responsibilities with the assistant drillers. Will now require the preparation of written risk assessment and Permit to Work for performing maintenance tasks on rig floor. Will audit the rig on performance of the updated procedure. 	N/A
7/15/2013	G-115	Are operations conducted in accordance with approved applications?	802, 410, 1202(a)(1), 1203(b)(1), 1204(a)(1)	Submitted new RPD containing new set point to BSEE.	N/A

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7/23/2013	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	300(a)	<ul style="list-style-type: none"> Held safety stand down with all the drilling crews to review incident. Removed the jumper hose from the cleanout line of each pit. Replaced the leaking cleanout line valve on mud pit 608 and inspected all other valves on the mud pit cleanout line system. Installed a cap on the camlock downstream of each cleanout line valve. 	N/A
10/10/2013	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)	<ul style="list-style-type: none"> Modified the Task Based Risk assessment. Included radio traffic in risk assessment. Moved controller for the tugger so operator can have direct line of sight. Review further use of headphones to reduce ambient noise. 	N/A
10/16/2013	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)	<ul style="list-style-type: none"> Crew changed out sensor. Recalibrated the gas detector and achieved a high, high alarm at 60%. 	N/A
11/21/2013	G-303	Is equipment containing hydrocarbons or other flammable substances relocated at least 35 feet horizontally from the welding site, 35 feet horizontally from the point of impact of slag, sparks, or burning materials at a lower elevation, or is it otherwise protected?	113	<ul style="list-style-type: none"> Flammable substances were moved at least 35 feet from the welding site. This incident was reviewed in pre-tour safety meetings. Drilling Contractor is updating their risk assessment process to add additional fire watches and expand the search area for flammables/combustibles to greater than 35 feet horizontally and vertically. 	N/A
12/19/2013	D-203	Is an automatic backup accumulator-charging system, supplied by a power source independent from the power source to the primary accumulator-charging system, and possessing sufficient capability to close all BOP components and hold them closed, provided?	443(a)	The pressure transducer that reads the manifold pressure to initiate the HPU pumps to start was changed out with a new transducer. The transducer was calibrated, testing of drawing down one accumulator bank leaving all the other banks isolated was conducted.	N/A

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12/20/2013	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)	<ul style="list-style-type: none"> Updated work instruction (and PPE requirements) for tripping pipe to address hazards of working in calcium bromide Confirmed that toolpushers, drillers, and assistant drillers have access to the facility MSDS online system and can access MSDS for calcium bromide. MSDS for calcium bromide is posted on the rig floor and will be attached to work instruction for jobs with potential exposure to calcium bromide. Trashcan in front of eye wash station and metal storage rack have been moved. 	N/A

Notes:

*A further description of the Potential Incident of Noncompliance (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 for one incident.

1. "INC" refers to Incident of Non-Compliance, which is a notice of alleged violation(s) of BSEE or BOEM regulations that is issued to BP.

2. Penalties assessed refer only to those BSEE penalties for 2013 INCs that were agreed and paid in 2013. Penalties may be agreed and paid in years subsequent to the year in which the INC was issued.

3. Status of February 14, 2014.

Acronyms:

Bbls	Barrels
BOP	Blowout Preventer
BSEE	Bureau of Safety and Environmental Enforcement
CFR	Code of Federal Regulations
HPU	High-Pressure Unit
IADC	International Association of Drilling Contractors
ISS	International Snubbing Services
MSDS	Material Safety Data Sheet
N/A	Not Applicable or Not Available
OEM	Original Equipment Manufacturer
PPE	Personal Protective Equipment
PSL	Pressure Safety Low
RPD	Revised Permit to Drill
SDV	Shutdown Valve
V	Valve