
2016 BPXP Incidents of Non-Compliance Summary

In 2016, BPXP had no Incidents of Non-Compliance with Probation, no Incidents of Non-Compliance with BOEM regulations, and nine (9) Incidents of Non-Compliance with BSEE regulations. For the INCs issued in 2016 by BSEE, no civil penalties have been assessed to BPXP as of December 31, 2016. There were no civil penalties paid in 2016 for INCs issued by BSEE in 2015. A list of the nine (9), 2016 INCs issued to BPXP from BSEE, along with the associated corrective actions and penalties assessed, are provided in **Table 1** below.

Table 1: 2016 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)
01/11/2016**	C-142	Has the casing been pressure-tested, calipered or otherwise evaluated every 30 days during prolonged operations and are results submitted to the District Manager?	250.518(b)	The following action was taken after receipt of the listed INC: <ul style="list-style-type: none"> A rescission was requested because the operations that were the subject of the INC were not “prolonged operations such as milling, fishing, jarring, or washing over that could cause damage to the casing”. Therefore, a casing test, within 30 days from November 28, 2015, was not required. 	N/A
01/11/2016**	C-126	Is an inside BOP or spring-loaded back-pressure safety valve and an essentially full-opening, work-string safety valve in the open position, being maintained on the rig floor at all times during well-completion operations?	250.516(d)	The following corrective actions were completed in order to ensure the appropriate rig equipment is available on the rig floor: <ul style="list-style-type: none"> For this operation, the IBOP valve stored near the auxiliary rotary was removed from the rig floor and the IBOP valve on the main side of the rig was returned to the open position. For future operations, BP has reinforced this compliance requirement with the drilling contractor. Additionally, the rig contractor has assigned the responsibility for verification of rig floor equipment at the beginning of each tour to more senior positions. 	N/A
03/04/2016	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	250.300(a)	The following corrective actions were completed to ensure there were no unauthorized discharges of pollutants into offshore waters: <ul style="list-style-type: none"> The Completion Workover Riser (CWOR) was recovered to surface to replace the annulus coflex line. The component was pressure tested on surface prior to redeployment of the CWOR. 	N/A
07/28/2016**	W-107	Atlantis DC133: Has the Lessee received written approval from the District Manager prior to conducting well-workover operations?	250.613(a)	The following corrective actions were completed to ensure that Lessees receive written approval from the District Manager PRIOR to conducting well-workover operations: <ul style="list-style-type: none"> A Sleeve Movement Workshop was conducted to review regulations, roles and responsibilities, for the teams involved in sleeve management. Discussions were held with BP onshore/offshore personnel to re-emphasize regulatory compliance expectations associated with shifting Down Hole Flow Control (DHFC) sleeves and this specific Incident of Non-Compliance. Enhanced Field Orders to offshore personnel now include a copy of the approved APM (Application for Permit to Modify), with zone(s) identified for flow, along with reminding personnel engaged in sleeve management, to check with the Operations supervisor and base management prior to shifting the DHFC sleeve(s) outside of what is instructed in the Field Orders. 	N/A

Date Received	BSEE PINC Number*	BSEE PINC Statement*	Authority 30 CFR § 250.	Corrective Actions Taken	Penalty Assessed (If Applicable)
07/28/2016**	W-107	Atlantis DC134: Has the Lessee received written approval from the District Manager prior to conducting well-workover operations?	250.613(a)	<p>The following corrective actions were completed to ensure that Lessees receive written approval from the District Manager PRIOR to conducting well-workover operations:</p> <ul style="list-style-type: none"> • A Sleeve Movement Workshop was conducted to review regulations, roles and responsibilities, for the teams involved in sleeve management. • Discussions were held with BP onshore/offshore personnel to re-emphasize regulatory compliance expectations associated with shifting Down Hole Flow Control (DHFC) sleeves and this specific Incident of Non-Compliance. • Enhanced Field Orders to offshore personnel now include a copy of the approved APM (Application for Permit to Modify), with zone(s) identified for flow, along with reminding personnel engaged in sleeve management, to check with the Operations supervisor and base management prior to shifting the DHFC sleeve(s) outside of what is instructed in the Field Orders. 	N/A
07/29/2016	P-451	Is each required PSV designed, installed and maintained, in accordance with applicable provisions of Sections I, IV and VIII of the ASME boiled and pressure vessel code and set a pressure no higher than the maximum allowable working pressure?	250.803(b)(1)(i)	<p>The following corrective action has been completed in response to Pressure Safety Valve (PSV) setting validation:</p> <ul style="list-style-type: none"> • The maintenance team successfully tested the PSV on PBE3155 Glycol pump #3 during the inspection on July 29, 2016. 	N/A
08/11/2016	F-141	Does the facility have an electrical lockout/tagout procedure in accordance with API RP 14F, Paragraph 12.8 or API RP 14FZ, Paragraph 12.9?	250.114(c) and 250.198	<p>The following corrective action has been completed in response to lockout/tagout procedure verification:</p> <ul style="list-style-type: none"> • Corrective action completed during inspection and the lockout/tagout procedure was provided. 	N/A
10/5/2016	G-115	Are operations conducted in accordance with approved applications?	250.107	<p>The following corrective action has been completed in response to verifying that operations are being conducted in accordance with approved applications:</p> <ul style="list-style-type: none"> • The maintenance team reset the alarm and successfully tested the low accumulator during the inspection on October 4, 2016. 	N/A
11/7/2016	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	250.300(a)	<p>The following corrective actions were completed to ensure there are no unauthorized discharges of pollutants into offshore waters:</p> <ul style="list-style-type: none"> • The kill hose swivel was removed from the gooseneck and the kill Coflexip hose was reinstalled directly to the gooseneck. • The aforementioned repair was reviewed with the contractor and they agreed with continued operations and provided a Statement of Fact. 	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:

<https://www.bsee.gov/what-we-do/regulatory-safety-programs/inspection-programs/potential-incident-of-noncompliance-pinc>

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

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 BPXP.
2. Penalties assessed refer only to those BSEE penalties for 2016 INCs that were agreed and paid, if applicable, in 2016. Penalties may be agreed and paid in years subsequent to the year in which the INC was issued.

Acronyms:

API	American Petroleum Institute
APM	Application for Permit to Modify
ASME	American Society of Mechanical Engineers
BOEM	Bureau of Ocean Energy Management
BOP	Blowout Preventer
BPXP	BP Exploration and Production
BSEE	Bureau of Safety and Environmental Enforcement
CFR	Code of Federal Regulations
CWOR	Completion Workover Riser
DAFWC	Days Away from Work Cases
DC	Drilling Center
DHFC	Down Hole Flow Control
IBOP	Internal Blowout Preventer
INC	Incidents of Non-Compliance
NRC	National Response Center
PSV	Pressure Safety Valve (pressure relief valve)
RP	Recommended Practice