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## 2017 BPXP Incidents of Non-Compliance Summary

In 2017, BPXP had no Incidents of Non-Compliance with Probation, no Incidents of Non-Compliance with BOEM regulations, and six (6) Incidents of Non-Compliance with BSEE regulations. For the INCs issued in 2017 by BSEE, no civil penalties have been assessed to BPXP as of December 31, 2017. There were no civil penalties paid in 2017 for INCs issued by BSEE in 2016. A list of the six (6), 2017 INCs issued to BPXP from BSEE, along with the associated corrective actions and penalties assessed, are provided in **Table 1** below.

**Table 1: 2017 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)
03/09/2017	P-451	Is each required PSV designed, installed and maintained, in accordance with applicable provisions of Sections I, IV and VIII of the ASME boiler and pressure vessel code and set at a pressure no higher than the maximum allowable working pressure?	250.880 (b)(2)	<p>The following actions were taken after a pressure safety valve (PSV) was discovered to be out of tolerance:</p> <ul style="list-style-type: none"> <li>• The valve (PSV MD 11602) was subsequently successfully tested at the same time as the inspection.</li> <li>• Pressure test procedure was communicated to offshore personnel to ensure pressure tests do not exceed 121% of the recommended maximum allowable pressure.</li> <li>• Reviewed pressure test history for the PSV in question.</li> </ul>	N/A
03/16/2017	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?	250.107	<p>The following corrective actions were completed:</p> <ul style="list-style-type: none"> <li>• The platform coolers were immediately isolated.</li> <li>• A pressure test was performed on the cooling system.</li> <li>• An oil leak was positively identified that was contained within the cooling medium system.</li> <li>• A project plan executed for replacing the portion of the cooler system with the leak.</li> <li>• Additional training was provided to platform personnel around US Outer Continental Shelf engineering standards and US Coast Guard related specific equipment standards.</li> </ul>	N/A
06/30/2017	G-116	Are operations conducted in accordance with approved plans?	550.280(a)	<p>The following corrective actions were completed to ensure there would be no future unauthorized discharges of air emissions exceeding approved limits:</p> <ul style="list-style-type: none"> <li>• The Air Quality Review was revised.</li> <li>• Air modeling was updated per the Bureau of Ocean Energy Management protocol.</li> <li>• A revised Development Operations Coordination Document (DOCD) was submitted, including updated emission estimates, for the affected facility.</li> </ul>	N/A

Date Received	BSEE PINC Number*	BSEE PINC Statement*	Authority 30 CFR § 250.	Corrective Actions Taken	Penalty Assessed (If Applicable)
07/06/2017	G-132	Has the district manager been verbally notified immediately following incidents involving all: fatalities, injuries requiring evacuation, loss of well control, fires, explosions, H <sub>2</sub> S releases as defined in 30 CFR 250.490(1), collisions, structural damages, crane incidents and safety system damages connected with any operations or activities on a lease, right-of-use and easement, pipeline right-of-way, or other permit issued by BSEE?	250.188	The following corrective actions were completed to ensure that proper communications are made whenever there is an incident that requires evacuation of an injured person: <ul style="list-style-type: none"> <li>Address ways to improve communications with BSEE regarding immediate incident notification.</li> <li>Conducted a review of internal communication process when an injury occurs on a rig.</li> <li>Explore opportunities to improve the reporting process within BP's internal safety observations and incident reporting system.</li> </ul>	N/A
10/13/2017	E-100	Is the operator preventing unauthorized discharge of pollutants into offshore waters?	250.300(a)	The following corrective actions were completed to minimize the potential of an unauthorized discharge into offshore waters: <ul style="list-style-type: none"> <li>Increase the awareness and learnings regarding valve verification and alignment procedures.</li> <li>Evaluate the strength of current procedures to ensure valves are appropriately aligned and their position(s) are verified.</li> <li>Investigate the use of technology to increase reliability of valve alignment and verification.</li> </ul>	N/A
12/14/2017	F-108	Are electrical installations made in accordance with API RP 500 and API RP 14F or API RP 505 and API RP 14FZ?		The following corrective actions were completed to remedy an improper seal found on the electrical box: <ul style="list-style-type: none"> <li>The junction box in the Pit Room was properly sealed the same day as the occurrence.</li> <li>The electrical switch O-ring on the Vega sensor was also fixed the same day as the occurrence.</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:  
<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.

- "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.
- 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.

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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
DOCD	Development Operations Coordination Document
H <sub>2</sub> S	Hydrogen Sulfide
IBOP	Internal Blowout Preventer
INC	Incidents of Non-Compliance
NRC	National Response Center
PSV	Pressure Safety Valve (pressure relief valve)
RP	Recommended Practice