

UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE
GULF OF MEXICO REGION

ACCIDENT INVESTIGATION REPORT

1. OCCURRED

DATE: **21-MAR-2009** TIME: **1110** HOURS

2. OPERATOR: **Rooster Petroleum, LLC**
REPRESENTATIVE: **Marc Walters**
TELEPHONE: **(337) 769-9344**
CONTRACTOR: **Flow Petroleum Services, Inc.**
REPRESENTATIVE: **Emile Navarre**
TELEPHONE: **(337) 593-9987**

- STRUCTURAL DAMAGE
- CRANE
- OTHER LIFTING DEVICE
- DAMAGED/DISABLED SAFETY SYS.
- INCIDENT >\$25K
- H2S/15MIN./20PPM
- REQUIRED MUSTER
- SHUTDOWN FROM GAS RELEASE
- OTHER

3. OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVISOR
ON SITE AT TIME OF INCIDENT:

6. OPERATION:

4. LEASE: **G14428**
AREA: **VR** LATITUDE:
BLOCK: **376** LONGITUDE:

- PRODUCTION
- DRILLING
- WORKOVER
- COMPLETION
- HELICOPTER
- MOTOR VESSEL
- PIPELINE SEGMENT NO.
- OTHER

5. PLATFORM:
RIG NAME:

6. ACTIVITY: EXPLORATION(POE)
 DEVELOPMENT/PRODUCTION
(DOCD/POD)

8. CAUSE:

7. TYPE:

- EQUIPMENT FAILURE
- HUMAN ERROR
- EXTERNAL DAMAGE
- SLIP/TRIP/FALL
- WEATHER RELATED
- LEAK
- UPSET H2O TREATING
- OVERBOARD DRILLING FLUID
- OTHER _____

- HISTORIC INJURY
 - REQUIRED EVACUATION
 - LTA (1-3 days)
 - LTA (>3 days)
 - RW/JT (1-3 days)
 - RW/JT (>3 days)
 - Other Injury

- FATALITY
- POLLUTION
- FIRE
- EXPLOSION

- LWC HISTORIC BLOWOUT
- UNDERGROUND
 - SURFACE
 - DEVERTER
 - SURFACE EQUIPMENT FAILURE OR PROCEDURES

COLLISION HISTORIC >\$25K <=\$25K

9. WATER DEPTH: **302** FT.

10. DISTANCE FROM SHORE: **110** MI.

11. WIND DIRECTION: **NNE**
SPEED: **15** M.P.H.

12. CURRENT DIRECTION:
SPEED: M.P.H.

13. SEA STATE: **5** FT.

17. INVESTIGATION FINDINGS:

During the period of March 19, 2009 to March 21, 2009 the platform was shut-in due to pipeline related maintenance. The platform produced a very low volume of natural gas during normal operations, and relied on incoming gas production from an adjacent facility to supply the platform with fuel gas. Due to the duration of the shut-in, the platform fuel gas was depleted. On March 21, 2009 Rooster Petroleum received permission to resume production. During the start-up process, operations personnel began pressuring up the main Fuel Gas Scrubber and Instrument Gas Filter which supplies fuel gas to all valve controllers associated with each process component. Operations personnel then proceeded to the master production panel. While pressuring up the ESD system and before the pumps on the Closed Drain Sump were activated, the fluid dump for the L.P. Relief Scrubber MBF-4810 opened and allowed oil to fill the Closed Drain Sump MBH-5330 and overflow through the local vent line on the Closed Drain Sump and into the Gulf of Mexico. Operations personnel isolated the source of the pollution and reported that a one barrel spill resulted from this incident.

18. LIST THE PROBABLE CAUSE(S) OF ACCIDENT:

The liquid dump on the L.P. Relief Scrubber opened prior to the pumps on the Closed Drain Sump being reset and oil was discharged into the Gulf of Mexico from the local vent on the Closed Drain Sump. The L.P. Relief Scrubber is located one deck above the closed drain sump and its higher elevation provided the necessary hydrostatic pressure needed to force the oil out of the vent.

19. LIST THE CONTRIBUTING CAUSE(S) OF ACCIDENT:

- * Operations personnel were not familiar with the platform start-up "from zero" protocol.
- * Failure to make modifications to the panel logic (safety system) after the previous operator changed over from electric pumps to pneumatic pumps on the Closed Drain Sump.
- * Design flaw with the point of discharge of the local vent line on the Closed Drain Sump. Due to the location of the Closed Drain Sump being located on the lowest deck elevation, the vent line discharged directly overboard from the same deck level rather than being extended to an elevation higher than the vessels that dump into the Closed Drain Sump.

20. LIST THE ADDITIONAL INFORMATION:

The platform safety system is designed such that each component has its own slave panel which controls the pumps and safety devices associated with the component. Without supply to reset the slave panel, the pumps and safety devices are inactive and cannot perform their design function.

This facility was originally equipped with electric pumps on the Closed Drain Sump. The previous operator removed the electric pumps and installed pneumatic diaphragm pumps, which are activated once the Closed Drain Sump slave panel is reset and the level controller on the Closed Drain Sump receives an indication of a level in the vessel. Since the pump modification was performed the panel logic was not changed to prevent fluids from being introduced into the Closed Drain Sump before the pneumatic diaphragm pumps on the Closed Drain Sump are activated.

The operator made the following modifications to prevent recurrence of a similiar oil spill:

- 1) the vent line on the closed drain sump was tied into the atmospheric vent system. The elevation of the atmospheric vent outlet is higher than all of the vessels that are tied into the atmospheric vent system; therefore, spills cannot occur from the vent due to hydrostatic forces alone.
- 2) the platform safety system logic was changed such that the closed drain sump pumps are activated and fully ready to pump before the SDV's on the L.P. relief scrubber, H.P. Scrubber, and the Glycol separator are able to open. Therefore, once a high level exists in the closed drain sump, the pumps will be reset/activated and ready to pump. This will also prevent overflow of the closed drain sump.
- 3) The platform safety system was modified to use instrument air instead of instrument gas due to the short supply of available natural gas. Also, a new air compressor was installed. The change to an air operated pneumatic system will allow the platform safety system to operate at maximum efficiency.

21. PROPERTY DAMAGED: NATURE OF DAMAGE:
None **N/A**

ESTIMATED AMOUNT (TOTAL): \$

22. RECOMMENDATIONS TO PREVENT RECURRENCE NARRATIVE:

The Lake Charles District does not have any recommendations for the MMS Regional Office of Safety Management.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: **YES**

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

**P-424 LSL on the L.P. Relief Scrubber (MBF-4810) failed to operate.
P-424 LSL on the Closed Drain Sump (MBH-5330) failed to operate.
E-100 1 BBL. pollution incident occurred on 3-21-09.**

25. DATE OF ONSITE INVESTIGATION:

23-MAR-2009

26. ONSITE TEAM MEMBERS:
**Mark Osterman / Scott Mouton / Guy
Bertrand / Wayne Meaux /**

29. ACCIDENT INVESTIGATION
PANEL FORMED: **NO**
OCS REPORT:

30. DISTRICT SUPERVISOR:
Larry Williamson

APPROVED
DATE: **02-JUN-2009**

