ABANDONMENT
LAST UPDATE - 2012
PERMANENT ABANDONMENT

A-100 **IS ISOLATION OF ZONES IN OPEN HOLE ACHIEVED?**
Authority: 30 CFR 250.1715(a)(1) **Enforcement Action: W**
INSPECTION PROCEDURE:
Verify that cement plugs were placed to extend from a minimum of 100 feet below the bottom to 100 feet above the top of any oil, gas, or freshwater zones.
IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if the cement plugs were not placed as required.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well inspected.

A-101 **IS ISOLATION OF THE OPEN HOLE BELOW THE CASING ACHIEVED?**
Authority: 30 CFR 250.1715(a)(2) **Enforcement Action: W**
INSPECTION PROCEDURE:
Verify that isolation of open hole below the casing has been achieved by one of the following methods:
1. A cement plug set by the displacement method placed at least 100 feet above and 100 feet below the deepest casing shoe;
2. A cement retainer with effective back-pressure control set 50 to 100 feet above the casing shoe and a cement plug that extends at least 100 feet below the casing shoe and at least 50 feet above the retainer; or
3. For expected or known lost circulation conditions, a bridge plug set 50 to 100 feet above the casing shoe with 50 feet of cement on top of the bridge plug.

IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if isolation of open hole below the casing has not been achieved.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well inspected.

A-102 **IS ISOLATION OF PERFORATED INTERVALS ACHIEVED?**
Authority: 30 CFR 250.1715(a)(3) **Enforcement Action: W**
INSPECTION PROCEDURE:
For a perforated zone that is currently open and not previously squeezed or isolated, verify that isolation has been achieved by one of the following methods:
1. A cement plug set by the displacement method at least 100 feet above to 100 feet below the perforated interval, or down to a casing plug, whichever is less.
2. In lieu of 1 above, the following methods are acceptable, provided the perforations are isolated from the hole below:
   A. A cement retainer with effective back-pressure control set not 50 to 100 feet above the top of the perforated interval, and a cement plug that extends at least 100 feet below the bottom of the perforated interval with 50 feet of cement above the retainer;
   B. A bridge plug set 50 to 100 feet above the top of the perforated interval and at least 50 feet of cement on top of the bridge plug;
   C. A through-tubing basket plug set no more than 100 feet above the perforated interval with at least 50 feet of cement on top of the basket plug; or
   D. A tubing plug set no more than 100 feet above the perforated interval topped with a sufficient volume of cement so as to extend at least 100 feet above the uppermost packer in the wellbore and at least 300 feet of cement in the casing annulus immediately above the packer.
3. Alternately, a method approved by the District Manager to squeeze cement to all perforations (30 CFR 150.1715(3)(i)).

IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if perforated intervals have not been isolated.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well inspected.

A-103 **IS PLUGGING OF THE STUB ACHIEVED?**

Authority: 30 CFR 250.1715(a)(4) **Enforcement Action: W**
30 CFR 250.1715(a)(5)

Note: For the purpose of this PINC, liner tops are not considered stubs.

INSPECTION PROCEDURE:

1. Where the casing stub is within the casing, verify that plugging is accomplished by one of the following methods:
   A. A cement plug set at least 100 feet above and 100 feet below the stub;
   B. A cement retainer or bridge plug set at least 50 to 100 feet above the stub with at least 50 feet of cement on top of the retainer or bridge plug; or
   C. A cement plug at least 200 feet long with the bottom of the plug set no more than 100 feet above the stub.
2. Where the casing stub is below the casing, verify that plugging is accomplished to isolate zones in open hole or to isolate open hole below the casing, as applicable (30 CFR 250.1715(a)(1) or 30 CFR 250.1715(a)(2)).

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the casing stub is not plugged as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-104 **IS ANY ANNULAR SPACE COMMUNICATING WITH OPEN HOLE AND EXTENDING TO THE MUD LINE PLUGGED AND, IF APPLICABLE, PRESSURE TESTED TO VERIFY ISOLATION?**

Authority: 30 CFR 250.1715(a)(6) **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Verify that any annular space communicating with open hole and extending to the mud line is plugged with at least 200 feet of cement.
2. For a well completed above the ocean surface, verify that each plugged annulus is pressure tested to verify isolation.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the annular space communicating with open hole and extending to the mud line is not plugged and pressure tested as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-105 **IS A CEMENT SURFACE PLUG SET IN THE SMALLEST STRING OF CASING WHICH EXTENDS TO THE MUD LINE?**

Authority: 30 CFR 250.1715(a)(8) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that a cement surface plug, which is at least 150 feet long, has been set with the top of the plug within the first 150 feet below the mud line in the smallest string of casing which extends to the mud line.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the plug is not set as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-107 **IS THE INTEGRITY OF APPLICABLE PLUGS VERIFIED?**

Authority: 30 CFR 250. 1715(b) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that the first plug below the surface plug and any plug placed across a lost circulation zone in open hole has been tested by one of the following methods:

1. A pipe weight of at least 15,000 pounds on the plug; or
2. A pump pressure of 1,000 psi with a resultant pressure drop of no more than 10 percent during a 15-minute testing period.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the plug integrity has not been verified.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-108 **IS THE DENSITY OF THE FLUID LEFT IN THE HOLE ADEQUATE FOR THE FORMATION INTERVAL?**

Authority: 30 CFR 250.1715(a)(9) **Enforcement Action: W**

Note: If applicable, the formation pressure encountered during the drilling of the well should be noted in the driller's report.

INSPECTION PROCEDURE:

Verify that each interval of the hole between the plugs has been filled with a fluid that exerts a hydrostatic pressure that is greater than the formation pressure in the interval.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that the intervals between the plugs have not been filled with a fluid of sufficient hydrostatic pressure.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-109 **ARE WELLHEADS AND CASINGS REMOVED AS REQUIRED?**

Authority: 30 CFR 250.1716 **Enforcement Action: W**

Note: Not applicable of water depth is greater than 800 meters (2,624 feet) or as otherwise approved by the District Manager.

INSPECTION PROCEDURE:

Verify (witness or from records) that wellheads and casings are removed to a depth of at least 15 feet below the mud line.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the wellheads and casings are not removed as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-110 **ARE PERMAFROST AREAS WITHIN THE WELL ABANDONED AS REQUIRED?**

Authority: 30 CFR 250.1715(a)(10) **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Verify (from APD, driller's report, cementing plan, logs, etc.) that permafrost areas within the well are identified.
2. Verify that the fluid left in the hole adjacent to permafrost areas has a freezing point below the temperature of the permafrost and is treated to inhibit corrosion.
3. Verify that cement plugs are designed to set before freezing and have a low heat of hydration.

Note: Information on type of fluid, inhibitor, and cement can be verified from operator's Plugging and Abandonment Plan (required by 30 CFR 250.1712).

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if permafrost areas within the well are not abandoned as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-111 **ARE 2 INDEPENDENT BARRIERS INSTALLED, ONE OF WHICH MUST BE A MECHANICAL BARRIER, IN THE CENTER WELLBORE BEFORE TEMPORARY OR PERMANENT ABANDONMENT OF THE WELL?**

Authority: 30 CFR 250.1715(a)(11) **Enforcement Action: W**
30 CFR 250.420(b)(3)

INSPECTION PROCEDURE:

1. Verify (from APR, Driller's report, cementing plan logs, etc.) that 2 independent barriers are in place before permanent abandonment of the well.
2. Verify that documentation has been submitted no later than 30 days after installation of barrier.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if two barriers are not installed as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

TEMPORARY ABANDONMENT

A-114 **DOES THE WELL MEET THE PLUGGING AND TESTING REQUIREMENTS FOR PERMANENT ABANDONMENT EXCEPT FOR A SURFACE PLUG, WELLHEAD REMOVAL, AND SITE CLEARANCE?**

Authority: 30 CFR 250.420(b)(3) **Enforcement Action: W**
30 CFR 250.1721

INSPECTION PROCEDURE:

Verify that temporary abandonment consists of the following:

1. A bridge plug or a cement plug at least 100 feet in length set at the base of the deepest casing string, unless the casing has been cemented and has not been drilled out. If a cement plug is set, it is not necessary for the cement plug to extend below the casing shoe into open hole.
2. Two independent barriers, one of which must be a mechanical barrier, in the center wellbore.
3. One of the following types of plugs set in the casing with the top of the plug no more than 1,000 feet below the mud line:
   A. A retrievable bridge plug;
   B. A permanent-type bridge plug; or
   C. A cement plug at least 100 feet in length.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the well is not temporary abandoned as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-117 **IS THE SUBSEA PROTECTIVE DEVICE INSTALLED AS REQUIRED?**

Authority: 30 CFR 250.1722 **Enforcement Action: W**

Note: Not applicable in water depths greater than 300 feet.

INSPECTION PROCEDURE:

1. Verify that the subsea protective device is installed in a manner that allows fishing gear to pass over the obstruction without damage to the obstruction, the protective device, or the fisheries gear.
2. Verify that the protective device does not extend more than 10 feet above the seafloor (unless approved otherwise).
3. Verify that trawling over the protective device has been completed and the results reported to the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the subsea protective device is not installed and trawl tested as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected.

A-121 **DOES THE BOP STACK FOR ABANDONMENT OPERATIONS WITH THE TREE REMOVED INCLUDE, AS A MINIMUM, THREE PREVENTERS WHEN THE EXPECTED SURFACE PRESSURE IS LESS THAN 5,000 PSI?**

Authority: 30 CFR 250.1706(b)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. For abandonment operations with the tree removed, where the anticipated surface pressure is less than 5,000 psi, visually inspect the BOP stack to verify the installation of the following as a minimum:
   A. One annular preventer.
   B. One set of pipe rams.
   C. One set of blind-shear rams.
2. For subsea BOP stacks, visually check the control station for the above configuration, or if available, check via the television camera.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack is not as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-122 **DOES THE BOP STACK FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE REMOVED INCLUDE, AS A MINIMUM, FOUR PREVENTERS WHEN THE EXPECTED SURFACE PRESSURE IS 5,000 PSI OR GREATER?**

Authority: 30 CFR 250.1706(b) (2) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. For abandonment operations with the tree removed, where the anticipated surface pressure is equal to or greater than 5000 psi, visually inspect the BOP stack to verify the installation of the following as a minimum:
   A. One annular preventer.
   B. Two sets of pipe rams.
   C. One set of blind-shear rams.
2. For subsea BOP stacks, visually check the control station for the above configuration or, if available, check via the television camera.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack is not as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-123 **DOES THE BOP STACK FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE REMOVED INCLUDE, AS A MINIMUM of four BOPS CONSISTING of an annular, One set of pipe rams, one set of DUAL PIPE RAMS and ONE SET OF BLIND-SHEAR RAMS WHEN MULTIPLE TUBING STRINGS ARE BEING HANDLED SIMULTANEOUSLY?**

Authority: 30 CFR 250.1706(b)(3) **Enforcement Action: S**

INSPECTION PROCEDURE:

For abandonment operations with the tree removed, when multiple tubing strings are being handled simultaneously, visually inspect the BOP stack is configured properly.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if BOP stack is not configured properly.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-124 **WHEN A TAPERED DRILL STRING IS USED, DOES THE BOP STACK INCLUDE AT LEAST ONE SET OF PIPE RAMS CAPABLE OF SEALING AROUND EACH SIZE OF DRILL STRING OR ONE SET OF VARIABLE BORE-RAMS SUBSTITUTING FOR 2 SETS OF PIPE RAMS?**

Authority: 30 CFR 250.1706(b)(4)(i) **Enforcement Action: S**
30 CFR 250.1706(b)(4)(iii)

INSPECTION PROCEDURE:

Verify at least one set of pipe rams capable of sealing around each size of drill string or one set of variable bore-rams substituting for 2 sets of pipe rams.

Note: This PINC applies to well-abandonment operations with the tree removed. One set of variable bore rams may be substituted for the two sets of fixed sized pipe rams. If anticipated MASP is greater than 5000 psi review PINC A-125

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack is not configured as described above.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-125 **WHEN A TAPERED DRILL STRING IS USED, DOES THE BOP STACK INCLUDE, AS A MINIMUM, TWO SETS OF PIPE RAMS THAT ARE CAPABLE OF SEALING AROUND THE LARGEST SIZE OF DRILL STRING WHEN THE EXPECTED SURFACE PRESSURE IS 5,000 PSI OR GREATER?**

Authority: 30 CFR 250.1706(b)(4)(ii) **Enforcement Action: S**

INSPECTION PROCEDURE:

For abandonment operations using tapered drill string where the anticipated surface pressure is equal to or greater than 5,000 psi, visually inspect the BOP stack to verify the installation two sets of pipe rams that are capable of sealing around the largest size of drill string.

Note: This PINC applies to well-abandonment operations with the tree removed.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack is not configured as described above.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-126 **DOES THE ACCUMULATOR STACK PROVIDE SUFFICIENT CAPACITY TO SUPPLY 1.5 TIMES THE VOLUME OF FLUID NECESSARY TO CLOSE AND HOLD CLOSED ALL BOP EQUIPMENT UNITS WITH MINIMUM PRESSURE OF 200 PSI ABOVE THE PRE-CHARGE PRESSURE, WITHOUT ASSISTANCE FROM A CHARGING STACK?**

Authority: 30 CFR 250.1706(c)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Verify that the BOP actuating stack which is installed is in compliance with that which has been approved.
2. Verify that the complete stack is free of leaks and that all components are in service (not bypassed).
3. Witness automatic operation of the charging stack.

Note: Refer to Appendix 23 for typical surface stack accumulator size calculations.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the hydraulic BOP actuating stack does not provide sufficient capacity to supply 1.5 times the volume necessary to close all BOP components with a minimum pressure of 200 psi above the pre-charge pressure without assistance from a charging stack.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-127 **DOES THE BOP STACK FOR WELL-ABANDONMENT WITH THE TREE REMOVED CONTAIN A SECONDARY POWER SOURCE, INDEPENDENT FROM THE PRIMARY POWER SOURCE, WITH SUFFICIENT CAPACITY TO CLOSE ALL BOP STACK COMPONENTS AND HOLD THEM CLOSED?**

Authority: 30 CFR 250.1706(c)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Verify that the backup power source is independent from the primary power source.
2. Witness operation of the accumulator backup stack and verify that the backup stack automatically charges the accumulators sufficiently to close and hold closed all BOP stack components.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (**S**) INC for the abandonment rig if:

1. The backup power stack is not independent from the primary power source.
2. The accumulator backup does not automatically charge the accumulator stack sufficiently to close and hold closed all stack components.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-128 **DOES THE BOP STACK FOR WELL-ABANDONMENT WITH THE TREE REMOVED CONTAIN LOCKING DEVICES FOR THE PIPE-RAM PREVENTERS?**

Authority: 30 CFR 250.1706(c)(3) **Enforcement Action: S**

DEFINITION:

Locking devices - Surface BOP stacks shall have locking devices provided on the ram-type preventers. Subsurface BOP stacks shall have ram lock-out indicator lights or other indication method as approved.

INSPECTION PROCEDURE:

1. Visually inspect surface BOP stacks and subsea BOP panels to verify that locking devices have been provided on ram-type preventers.
2. If conditions permit, witness operation of locking devices.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if operable locking devices are not provided.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-129 **DOES THE BOP STACK FOR WELL-ABANDONMENT WITH THE TREE REMOVED CONTAIN AT LEAST ONE REMOTE BOP CONTROL STATION AND ONE BOP CONTROL STATION ON THE RIG FLOOR?**

Authority: 30 CFR 250.1706(c)(4) **Enforcement Action: S**

DEFINITION:

Remote BOP control station - A control panel located such that the operation of each preventer and control valve can be controlled from a readily accessible point at a safe distance from the rig floor.

INSPECTION PROCEDURE:

1. Verify that a readily accessible remote BOP control station exists at the rig site.
2. Verify that a BOP control station exists on the rig floor.
3. Witness the operation of both control stations, or inspect the control panel gauge for presence of operating control pressure.

Note: If your location does not have a “rig floor” verify that there is a secondary remote BOP control station.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if:

1. An operable remote BOP control station is not installed.
2. An operable BOP control station is not installed on the rig floor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC each station inspected.

A-130 **DOES THE BOP STACK FOR WELL-ABANDONMENT WITH THE TREE REMOVED CONTAIN A CHOKE LINE AND A KILL LINE EACH EQUIPPED WITH TWO FULL OPENING VALVES AND A CHOKE MANIFOLD?**

Authority: 30 CFR 250.1706(c)(5) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Visually verify that each choke and kill line is equipped with two full-opening valves and a choke manifold.
2. Conditions permitting, witness the operation of the valves.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (**S**) INC for the abandonment rig if:

1. The choke and kill lines are not equipped with two operable full opening valves.
2. There is no manifold.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

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A-131 **DOES THE BOP STACK FOR WELL-ABANDONMENT WITH THE TREE REMOVED CONTAIN AT LEAST ONE REMOTELY-CONTROLLED VALVE ON BOTH THE CHOKE LINE AND ON THE KILL LINE?**

Authority: 30 CFR 250.1706(c)(5) **Enforcement Action: S**

INSPECTION PROCEDURE:

Visually inspect the choke and kill lines to determine if they are each equipped with at least one remotely-controlled valve.

Note: For the kill line (surface stacks only), a check valve may be installed on the kill line in lieu of the remotely-controlled valve provided two readily accessible manual valves are in place and the check valve is placed between the manual valves and the pump.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (**S**) INC for the abandonment rig if:

1. The choke line is not equipped with at least one remotely-controlled valve.
2. The kill line is not equipped with at least one remotely-controlled valve.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-132 **IS THE PRESSURE RATING OF THE CHOKE AND KILL LINES AND ASSOCIATED EQUIPMENT AT LEAST EQUIVALENT TO THE PRESSURE RATING OF THE RAM PREVENTERS?**

Authority: 30 CFR 250.1706(c)(5) **Enforcement Action: S**

INSPECTION PROCEDURE:

Visually verify that all equipment has a rated working pressure at least equal to the rated working pressure of the ram preventers by examining the rating tags.

Note: This PINC applies to well-abandonment operations with the tree removed.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if any equipment does not have a rated working pressure at least equal to the rated working pressure of the ram type preventers.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-133 **IS THE CHOKE LINE INSTALLED ON THE BOP STACK ABOVE THE BOTTOM RAM?**

Authority: 30 CFR 250.1706(c)(5) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that the choke line is installed above the bottom ram.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC when the choke line is not installed above the bottom ram.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

A-134 **IS THE KILL LINE INSTALLED ON THE BOP STACK?**

Authority: 30 CFR 250.1706(c)(5) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that the kill line is installed.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC when the kill line is not installed.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

A-135 **DO THE MINIMUM BOP-STACK COMPONENTS WITH THE TREE IN PLACE AND PERFORMED THROUGH THE WELLHEAD INSIDE CONVENTIONAL TUBING USING SMALL-DIAMETER JOINTED PIPE AS A WORK STRING INCLUDE TWO SETS OF PIPE RAMS AND ONE SET OF BLIND RAMS?**

Authority: 30 CFR 250.1706(d) **Enforcement Action: S**

INSPECTION PROCEDURE:

If a small diameter jointed pipe is being used as a work string inside conventional tubing with the tree in place, verify that the BOP stack contains, as a minimum:

1. Two sets of pipe rams.
2. One set of blind rams.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack is not configured as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-136 **DO THE MINIMUM BOP STACK COMPONENTS FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE PIPE-STRIPPER ASSEMBLY OR ANNULAR-TYPE WELL CONTROL EQUIPMENT INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.1706(f)(1)(i) **Enforcement Action: S**

INSPECTION PROCEDURE:

If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP stack includes, as a minimum, one pipe-stripper assembly or annular-type well-control equipment.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack does not contain at least one pipe-stripper assembly.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-137 **DO THE MINIMUM BOP STACK COMPONENTS FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE SET OF HYDRAULICALLY OPERATED BLIND RAMS INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.1706(f)(1)(ii); (f)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP stack includes, as a minimum, one set of blind rams that are hydraulically operated.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack does not contain at least one set of blind rams that are hydraulically operated.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected

A-138 **DO THE MINIMUM BOP STACK COMPONENTS FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE HYDRAULICALLY OPERATED SHEAR RAMS INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.1706(f)(1) (iii) **Enforcement Action: S**
30 CFR 250.1706(f) (2)

INSPECTION PROCEDURE:

If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP stack includes, as a minimum, one set of blind-shear rams that are hydraulically operated.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack does not contain at least one set blind-shear rams that are hydraulically operated.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected

A-139 **DO THE MINIMUM BOP STACK COMPONENTS FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE TWO-WAY HYDRAULICALLY OPERATED SLIP ASSEMBLY INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.1706(f)(1)(v) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP stack includes, as a minimum, one two-way slip assembly that is hydraulically operated.
2. If returns are taken through an outlet on the BOP stack, you must have an additional hydraulically operated pipe ram.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack does not contain at least one two-way slip assembly that is hydraulically operated.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected

A-140 **DO THE MINIMUM BOP-STACK COMPONENTS FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED-TUBING OPERATIONS INCLUDE ONE SET OF HYDRAULICALLY OPERATED PIPE RAMS INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.1706(f)(1)(vi) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. If coiled tubing operations are in progress, with the tree in place, verify that the BOP stack includes, as a minimum, one set of pipe rams hydraulically operated.
2. If surface pressures are greater than 3500psi, then you must use an additional hydraulically-operated blind-shear ram located as close to the tree as is practical.
3. If returns are taken through an outlet on the BOP stack, you must have a flow tee or cross, a hydraulically operated blind-shear ram located as close to the tree as practical. As an option the pipe rams can be placed below the blind-shear rams.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack does not contain at least one set of pipe rams which are hydraulically operated.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-141 **DOES THE MINIMUM BOP STACK COMPONENTS FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE, A DUAL CHECK VALVE ASSEMBLY, CHOKE AND KILL VALVES WITH EQUAL OR GREATER WORKING PRESSURE THEN THE CONNECTION TO WHICH THEY ARE ATTCAHED AND ARE ALL CONNECTIONS FLANGED?**

Authority: 30 CFR 250.1706 (f)(4) **Enforcement Action: S**
30 CFR 250.1706(f)(5)
30 CFR 250.1706(f)(7)

INSPECTION PROCEDURE:

If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP stack includes, as a minimum, a dual check valve assembly, choke and kill lines with equal or greater working pressure then the connection to which they are attached and are all connections flanged?

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack does not meet the above requirements.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-142 **WHEN THE TREE IS IN PLACE, DOES THE HYDRAULIC-ACTUATING SYSTEM PROVIDE SUFFICIENT ACCUMULATOR CAPACITY TO CLOSE-OPEN-CLOSE EACH COMPONENT IN THE BOP STACK WITH AT LEAST 200 PSI ABOVE THE PRECHARGE PRESSURE WITHOUT ASSISTANCE FROM A CHARGING SYSTEM?**

AUTHORITY: 30 CFR 250.1706(f) (6) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Verify that the BOP actuating system which is installed with tree in place is in compliance with that which has been approved.
2. Verify that the complete system is free of leaks and that all components are in service (not bypassed).
3. Witness operation of the system.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the ABANDONMENT rig if the BOP stack does not have sufficient capacity to close-open-close all components in the BOP stack

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP system inspected

A-143 **DO THE MINIMUM BOP STACK COMPONENTS FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY SNUBBING OPERATIONS INCLUDE ONE SET OF PIPE RAMS HYDRAULICALLY OPERATED?**

Authority: 30 CFR 250.1706(g) (1) **Enforcement Action: S**

INSPECTION PROCEDURE:

If snubbing operations are in progress with the tree in place, visually inspect to verify that the BOP stack includes, as a minimum, one set of pipe rams that are hydraulically operated.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack does not contain at least one set of pipe rams that are hydraulically operated.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-144 **DO THE MINIMUM BOP STACK COMPONENTS FOR WELL-ABANDONMENT OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY SNUBBING OPERATIONS INCLUDE TWO SETS OF STRIPPER-TYPE PIPE RAMS HYDRAULICALLY OPERATED WITH SPACER SPOOL?**

Authority: 30 CFR 250.1706(g) (2) **Enforcement Action: S**

INSPECTION PROCEDURE:

If snubbing operations are in progress with the tree in place, visually inspect to verify that the BOP stack includes, as a minimum, two sets of stripper-type pipe rams that are hydraulically operated and a spacer spool.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the BOP stack does not contain:

1. At least two sets of stripper-type pipe rams that are hydraulically operated.
2. A spacer spool.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-145 **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-ABANDONMENT OPERATIONS WHEN THE TREE IS REMOVED OR DURING WELL-ABANDONMENT OPERATIONS WITH THE TREE INSTALLED AND USING SMALL TUBING AS THE WORK STRING?**

Authority: 30 CFR 250.1706(h) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Verify that the inside BOP and drill-string safety valves fitting all sizes of pipe in the drill-string are available on the rig floor and are operable.
2. Verify that the inside BOP and drill-string safety valves have a rated working pressure equal to or greater than the rated working pressure of the BOP stack in use.
3. Visually confirm that the inside BOP and drill-string safety valves are in the open position.

Note: The full-opening work-string safety valve is not required for coiled tubing or snubbing operations.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if:

1. The required inside BOP and drill-string safety valve are not available on the rig floor, or
2. The valves are not maintained in the open position, or
3. The valves do not have a rated working pressure equal to or greater than the rated working pressure of the BOP stack in use.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per each valve inspected.

A-146 **IS A WRENCH FITTING THE WORK-STRING SAFETY VALVES READILY AVAILABLE?**

Authority: 30 CFR 250.1706(h) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that wrenches to fit each valve in use are available in the rig floor area.

Note: This requirement pertains to well-abandonment operations with the tree removed or during operations with the tree installed and using small tubing as the work string. The wrench is not required for coiled tubing or snubbing operations.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if the wrenches are not readily available.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per each valve inspected

A-147 **ARE CONNECTIONS READILY AVAILABLE FOR INSERTING VALVES IN THE WORK STRING?**

Authority: 30 CFR 250.1706(h) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that connections are readily available for inserting valves in the work string.

Note: This requirement pertains to well-abandonment operations with the tree removed or during operations with the tree installed and using small tubing as the work string. The wrench is not required for coiled-tubing or snubbing operations.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the abandonment rig if connections are not readily available for inserting valves in the work string.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per each valve inspected

A-148 **HAVE RAM-TYPE BOP'S, RELATED CONTROL EQUIPMENT, INCLUDING THE CHOKE AND KILL MANIFOLDS, AND SAFETY VALVES BEEN SUCCESSFULLY TESTED (OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER)?**

Authority: 30 CFR 250.1707(a) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that pressure tests have been performed on rams and related equipment.
2. Verify that tests have been performed to the rated working pressure of the BOP equipment or as otherwise approved by the District Manager.
3. Witness tests if performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if rams and related control equipment have been tested, to less than minimum requirements, but were later met by a subsequent test.

Issue a facility shut-in (**S**) INC for the abandonment rig if the rams and related control equipment have not been tested as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-149 **HAVE SURFACE BOP STACKS BEEN PRESSURE TESTED WITH WATER?**

Authority: 30 CFR 250.1707(a) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that pressure tests on surface BOP stacks were conducted with water.
2. Witness the test if it is conducted during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that the surface BOP stack was not pressure tested with water in the past, but a subsequent test was conducted with water.

Issue a facility shut-in (**S**) INC for the abandonment rig if the surface BOP stack has not been tested with water.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP stack inspected.

A-150 **PRIOR TO CONDUCTING HIGH-PRESSURE TESTS, ARE ALL BOP STACKS AND COIL TUBING TESTED TO A LOW PRESSURE OF 200 TO 300 PSI?**

Authority: 30 CFR 250.1707(a) (1) **Enforcement Action: W/S**
30 CFR 250.1707(e)

INSPECTION PROCEDURE:

1. Verify that a low-pressure test on BOP equipment was conducted prior to a high-pressure test.
2. If inspection is being performed during commencement of testing of BOP stack, confirm operator's compliance with low-pressure testing requirements. If initial pressure exceeds 500 psi you must bleed back to 0 before starting the test.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if a low-pressure test was missed, but subsequently performed.

Issue a facility shut-in (**S**) INC for abandonment operations on a production platform or a MODU when records indicate a low-pressure test was not performed prior to a high-pressure test.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-151 **HAS THE ANNULAR-TYPE BOP BEEN SUCCESSFULLY TESTED AT 70 PERCENT OF ITS RATED WORKING PRESSURE (OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER)?**

Authority: 30 CFR 250.1707(a) (2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Determine the rated working pressure of the annular-type BOP by visually inspecting the body of the preventer for a rating stamping or tag.
2. Inspect the operator's log to verify that the annular-type preventers were pressure tested to 70 percent of the rated working pressure, or as otherwise approved by the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that pressure test was not performed to 70 percent of the rated working pressure of the annular-type preventer, but subsequent test was performed to 70 percent of the rated working pressure.

Issue a facility shut-in (**S**) INC for the abandonment rig if the annular-type preventers were not tested to 70 percent of the rated working pressure.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-152 **HAVE VARIABLE BORE RAMS BEEN PRESSURE-TESTED AGAINST THE LARGEST AND SMALLEST SIZES OF TUBULARS IN THE WELL, EXCLUDING DRILL COLLARS?**

Authority: 30 CFR 250.1707(a) (3) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that tests have been conducted.
2. Witness the test if it is performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that the variable bore pipe rams were not pressure tested against the largest and smallest sizes of tubulars in use (jointed pipe, seamless pipe) in the well, but subsequent successful tests have since been conducted.

Issue a facility shut-in (**S**) INC for the abandonment rig if the tests have not been conducted as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per each inspection.

A-153 **HAVE THE BOP STACKS BEEN TESTED WHEN INSTALLED?**

Authority: 30 CFR 250.1707(b) (1) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that tests were performed when the BOP stack was initially installed.
2. Witness the tests if they are being performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if operations have commenced without the initial tests, but subsequent tests have been performed.

Issue a facility shut-in (**S**) INC for the abandonment rig if installation has been accomplished and no tests have been performed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-154 **HAVE THE BOP STACKS BEEN TESTED AT LEAST ONCE EVERY 7 DAYS?**

Authority: 30 CFR 250.1707(b) (2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

Inspect operator's log to verify that tests were performed at least every 7 days.

Note:

1. More than 7 days is allowed when well operations prevent testing due to problems such as:
   A. Stuck pipe.
   B. Pressure control operations.
   C. Remedial well efforts.
2. The tests shall be conducted as soon as possible after the problem is solved, but before normal operations resume.
3. The reason for postponing testing shall be entered into the operations log.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that tests other than most recent test exceeded the 7-day interval requirement without acceptable explanation in the operator's log.

Issue a facility shut-in (**S**) INC for the abandonment rig if the date of most recent test exceeds the 7 days and acceptable explanation is not entered in the operator's log.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-155 **HAVE THE BLIND OR BLIND-SHEAR RAMS BEEN TESTED AT LEAST ONCE EVERY 30 DAYS DURING OPERATION?**

Authority: 30 CFR 250.1707(b) (2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify the BLIND OR blind-shear rams have been tested at least once every 30 days.
2. If testing is being performed during the inspection, witness the test.

Note:

1. A longer period between blowout preventer tests is allowed when there is a stuck pipe or pressure control operation and remedial efforts are being performed. The tests shall be conducted as soon as possible and before normal operations resume.
2. The reason for postponing testing shall be entered into the operations log.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that tests other than most recent test exceeded the 30-day requirement.
Issue a facility shut-in (**S**) INC for the abandonment rig if a test has not been conducted in the last 30 days.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-156 **HAVE THE BOP STACKS BEEN TESTED FOLLOWING REPAIRS THAT REQUIRE DISCONNECTING A PRESSURE SEAL IN THE ASSEMBLY?**

Authority: 30 CFR 250.1707(b) (3) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

Inspect operator's log to verify that, where repairs required disconnection of pressure seals, tests on affected seals were conducted.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that operations commenced without tests being conducted on the seals, but subsequent successful BOP tests were conducted.
Issue a facility shut-in (**S**) INC for the abandonment rig if no tests were conducted on the seals following repairs.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-157 **DO THE TESTS ALTERNATE BETWEEN CONTROL STATIONS AND AT STAGGERED INTERVALS TO ALLOW EACH CREW TO OPERATE THE EQUIPMENT?**

Authority: 30 CFR 250.1707(b) (2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that each crew has been allowed to operate the equipment during tests.
2. Verify that all control stations are functional.
3. Conditions permitting, witness operation of the BOP equipment by the crew on tour.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that control stations have not been alternated during tests.
Issue a facility shut-in (**S**) INC for the abandonment rig if either control station is found to be inoperable.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-158 **ARE ALL PERSONNEL ENGAGED IN WELL-ABANDONMENT OPERATIONS PARTICIPATING IN A WEEKLY BOP DRILL TO FAMILIARIZE CREW MEMBERS WITH APPROPRIATE SAFETY MEASURES?**

Authority: 30 CFR 250.1707(c) **Enforcement Action: W**

INSPECTION PROCEDURE:

Inspect operator's log to verify that all personnel are participating in weekly well-control drills and that they have been recorded.

Note: The operator may be instructed to conduct a BOP drill at any time during the inspection while operations are in progress after consulting with the company representative.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if weekly BOP drills have not been conducted or recorded.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-159 **DID YOU SUCCESSFULLY PRESSURE TEST THE DUAL CHECK VALVE TO THE RATED WORKING PRESSURE OF THE CONNECTOR, THE RATED WORKING PRESSURE OF THE DUAL CHECK VALVE, EXPECTED SURFACE PRESSURE, OR THE COLLAPSE PRESSURE OF THE COIL TUBING, WHICHEVER IS LESS?**

Authority: 30 CFR 250.1707(e) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

Inspect operator's testing documentation to verify the dual check valve has been tested properly.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if previous tests were unsuccessful, but they had a subsequent successful test.

Issue a shut-in (**S**) if a successful test has not been performed and operations are ongoing.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-160 **IS THE TEST INTERVAL FOR EACH BOP COMPONENT TESTED SUFFICIENT TO DEMONSTRATE THAT THE COMPONENT IS EFFECTIVELY HOLDING PRESSURE?**

Authority: 30 CFR 250.1707(f) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

Verify that each BOP component held pressure for at least five minutes or other time period approved by the District Manager by checking the pressure charts or alternative documentation as approved by the District Manager.

Note: Ten minute high pressure test required for coil tubing string only.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the pressure charts or other documentation indicates that each BOP component did not hold pressure for at least five minutes or other time period approved by the District Manager, but subsequent tests were successful.

Issue a shut-in (**S**) if a successful test has not been performed and operations are ongoing.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-161 **ARE BOP TEST PRESSURE CHARTS CERTIFIED AS CORRECT BY THE OPERATOR'S REPRESENTATIVE AT THE FACILITY?**

Authority: 30 CFR 250. 1707(f) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that each pressure chart contains a written certification (signature and date) by the operator's representative at the facility

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if any pressure chart does not contain a written certification by the operator's representative at the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-162 **ARE THE TIME, DATE, AND RESULTS OF ALL PRESSURE TESTS, ACTUATIONS, INSPECTIONS, AND CREW DRILLS OF THE BOP STACK, STACK COMPONENTS, AND MARINE RISERS RECORDED IN THE OPERATIONS LOG OR REFERENCED DOCUMENT?**

Authority: 30 CFR 250.1707(g) **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Check the operations log to verify that the time, date, and results of all pressure tests, actuations, inspections, and crew drills of BOP stacks, stack components, and marine risers are recorded.
2. As an alternative, the documentation required to be entered in the operations log may be referenced there. If the time, date, and results of the pressure tests, actuations, inspections, and crew drills of BOP stacks, stack components, and marine risers are referenced in the operations log, check the referenced document to verify that the documentation is there.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the time, date and results of all pressure tests, actuations, inspections, and crew drills of the BOP stacks, stack components, and marine risers are not entered in the operations log or referenced document.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-163 **DOES THE DOCUMENTATION INDICATE THE SEQUENTIAL ORDER OF BOP AND AUXILIARY EQUIPMENT TESTING AND THE PRESSURE AND DURATION OF EACH TEST?**

Authority: 30 CFR 250.1707(g) **Enforcement Action: W**

INSPECTION PROCEDURE:

Check the operations log or referenced document to verify that the sequential order of BOP and auxiliary equipment testing, and the pressure and duration of each, test are recorded.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the documentation does not indicate the sequential order of BOP and auxiliary equipment testing and the pressure and duration of each test.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-164 **IS THE CONTROL STATION USED DURING THE TEST IDENTIFIED IN THE OPERATIONS LOG OR REFERENCED DOCUMENTS?**

Authority: 30 CFR 250.1707(g) (2) **Enforcement Action: W**

INSPECTION PROCEDURE:

Check the operations log or referenced document to verify that the control station used during the test is identified.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the control station used during the test is not identified in the operations log or referenced document.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-165 **FOR SUBSEA SYSTEMS, IS THE POD USED DURING THE TEST IDENTIFIED IN THE OPERATIONS LOG OR REFERENCED DOCUMENTS?**

Authority: 30 CFR 250.1707(g) (2) **Enforcement Action: W**

INSPECTION PROCEDURE:

Check the operations log or referenced documents to verify that the pod used during the test is identified.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the pod used during the test is not identified in the operations log or referenced documents.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-166 **ARE ANY PROBLEMS OR IRREGULARITIES OBSERVED DURING BOP AND AUXILIARY EQUIPMENT TESTING AND ANY ACTIONS TAKEN TO REMEDY SUCH PROBLEMS OR IRREGULARITIES RECORDED IN THE OPERATIONS LOG OR REFERENCED DOCUMENTS?**

Authority: 30 CFR 250.1707(g) (3) **Enforcement Action: W**

INSPECTION PROCEDURE:

Check the operations log or referenced document to verify that problems or irregularities observed during BOP and auxiliary equipment testing and actions taken to remedy such problems or irregularities are recorded.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if problems or irregularities observed during the testing of BOP and auxiliary equipment and actions taken to remedy such problems or irregularities are not recorded in the operations log or referenced documents.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-167 **ARE ALL RECORDS INCLUDING PRESSURE CHARTS, OPERATIONS LOGS, AND REFERENCED DOCUMENTS OF BOP TESTS, ACTUATIONS, AND INSPECTIONS AVAILABLE AT THE FACILITY FOR THE DURATION OF THE WELL-ABANDONMENT ACTIVITY?**

Authority: 30 CFR 250.1707(g) (4) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify all records including pressure charts, operations logs, and referenced documents of BOP tests, actuations, and inspections are available at the facility for the duration of the well-ABANDONMENT activity.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if all records of BOP tests, actuations, and inspections including pressure charts, operations logs, and referenced documents are not available at the facility for the duration of the well-ABANDONMENT activity.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

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A-168 **ARE ALL SUCH RECORDS RETAINED FOR A PERIOD OF TWO YEARS AT THE FACILITY, AT THE LESSEE'S FIELD OFFICE NEAREST THE FACILITY, OR AT ANOTHER LOCATION CONVENIENTLY AVAILABLE TO THE DISTRICT MANAGER?**

Authority: 30 CFR 250.1707(g) (4) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify all such records are available.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the records are not conveniently available.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

SUBSEA BOP TEST/ACUATION/INSPECTION AND MAINTENANCE

A-190 **DOES THE SUBSEA BOP SYSTEM FOR WELL ABANDONMENT OPERATIONS INCLUDE AT LEAST FOUR REMOTE –CONTROLLED HYDRAULICALLY OPERATED BOPS?**

Authority: 30 CFR 250.1706(b)(5) **Enforcement Action: S**
30 CFR 250.442 (a)

INSPECTION PROCEDURE:

1. Check records to verify operator has
   a. One annular BOP
   b. Two BOPs equipped with pipe rams
   c. One BOP equipped with blind shear rams

Note: The blind shear rams must be capable of shearing any drill pipe in the hole under maximum anticipated surface pressure. For subsea BOP stacks, visually check the control station for the above configurations or if available check via television camera.

IF NONCOMPLIANCE EXISTS:

Issue RIG shut-in (**S**) INC when the operator cannot verify that the BOP stack IS NOT CONFIGURED AS required.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP stack inspected

A-191 **DOES THE BOP SYSTEM FOR WELL ABANDONMENT OPERATIONS INCLUDE OPERABLE DUAL-POD CONTROL SYSTEMS TO ENSURE PROPER AND INDEPENDENT OPERATION?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: S**
30 CFR 250.442(b)

INSPECTION PROCEDURE:

1. Verify that a dual pod control system has been installed as follows:
   A. Two completely redundant control pods.
   B. Each pod contains all necessary valves and regulators to operate the BOP stack functions.
2. Conditions permitting, witness a function test of each pod to verify proper actuation.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC when an operable dual pod control system has not been installed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

A-192 **DOES THE ACCUMULATOR CLOSING SYSTEM FOR WELL ABANDONMENT OPERATIONS, PROVIDES FAST CLOSURE OF THE BOP COMPONENTS AND TO OPERATE ALL CRITICAL FUNCTIONS IN CASE OF A LOSS OF THE POWER FLUID CONNECTION TO THE SURFACE, INSTALLED IN ACCORDANCE WITH API RP 53 SECTION 13.3?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: S**
30 CFR 250.442(c)

INSPECTION PROCEDURE:

Verify that -

1. BOP stack is equipped with accumulator bottles.
   a. BOP Rams close within 45 seconds.
   b. Annular BOPS close within 60 seconds.
   c. Operating response time for the choke and kill valves (either open or closed) does not exceed the minimum observed BOP Ram close response time.
   d. Time to unlatch the lower marine riser package does not exceed 45 seconds.
2. Check closing times for pressure and function tests are in compliance.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC if the accumulator closing system cannot operate the specified equipment within the specified time.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

A-193 **DOES OPERATOR'S SUBSEA ACCUMULATOR PRECHARGE PRESSURE COMPENSATE FOR THE WATER DEPTH THE BOPS WILL BE OPERATING IN ACCORDANCE WITH API RP 53, SECTION 13.3.7?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: S**
30 CFR 250.442(c)

INSPECTION PROCEDURE:

Check records to verify the subsea accumulator precharge pressure compensates for the water depth the BOPs will be operating in.

Note: For example, if the precharge pressure of the surface accumulator is 1,000 psi and the BOPs will be in 500ft water depth, the subsea accumulators must be precharged to 1,225psi.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut in (**S**) INC if subsea accumulator precharge pressure does not compensate for the water depth the BOPs will be operating in.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea accumulator system inspected.

A-194 **DID OPERATOR CALIBRATE ACCULUMATOR PRESSURE GAUGES TO ONE PERCENT OF FULL SCALE AT LEAST ONCE EVERY THREE YEARS FOR WELL-ABANDONMENT OPERATIONS IN ACCORDANCE WITH API RP 53, SECTION 13.3.8?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: W**
30 CFR 250.442(c)

INSPECTION PROCEDURE:

Check records to verify operator calibrated accumulator pressure gauges every three years to one percent of full scale.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if operator did not calibrate accumulator pressure gauges every three years to one percent of full scale.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea BOP system inspected.

A-195 **IS THE SUBSEA BOP STACK EQUIPPED WITH A ROV INTERVENTION FOR WELL ABANDONMENT OPERATIONS?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: S**
30 CFR 250.442(d)

INSPECTION PROCEDURE:

1. Verify each ROV is fully compatible with the BOP ROV INTERVENTION PANEL
2. Check records to verify the ROV is capable of closing one set of pipe rams and one set of blind shears and unlatching LMRP.
3. Conditions permitting, witness
   a. the ROV intervention functions on the subsea BOP stack during the stump test.
   b. the testing at least one set of rams during the initial test on the seafloor.
   c. the function testing of the ROV hot stabs to determine if they are capable of actuating a minimum of one set of pipe rams and one set of blind shear rams and unlatching the LMRP during the stump test.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC if the ROV function testing does not meet one or more of the requirements listed above.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per ROV inspected.

A-196 **DOES THE SUBSEA BOP SYSTEM HAVE AN AUTOSHEAR AND DEADMAN SYSTEM FOR DYNAMICALLY POSITIONED RIGS FOR WELL ABANDONMENT OPERATIONS?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: S**
30 CFR 250.442(f)

Definitions:

1. **Autoshear system** means a safety system that is designed to automatically shut in the wellbore in the event of a disconnect of the LMRP. When the autoshear is armed, a disconnect of the LMRP closes the shear rams. This is considered a "rapid discharge" system.
2. **Deadman System** means a safety system that is designed to automatically close the wellbore in the event of a simultaneous absence of hydraulic supply and signal transmission capacity in both subsea control pods. This is considered a "rapid discharge" system.

INSPECTION PROCEDURE:

Verify that operator provided an autoshear and deadman systems for dynamically positioned rigs when drilling.

Note: Operator does not have to have an acoustic system.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) if operator did not provide an autoshear and deadman systems for dynamically positioned rigs when drilling.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea BOP system inspected.

A-197 **DID THE OPERATOR INSTALL OPERATIONAL OR PHYSICAL BARRIER(S) ON A SUBSEA BOP CONTROL PANEL TO PREVENT ACCIDENTAL DISCONNECT FOR WELL ABANDONMENT OPERATIONS?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: W**
30 CFR 250.442(g)

INSPECTION PROCEDURE:

Verify that operator incorporated enable buttons on a subsea BOP control panel to ensure two-handed operation for all critical functions.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if operator did not incorporated enable buttons on control panels to ensure two-handed operation for all critical functions.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea BOP system inspected.

A-198 **DID THE OPERATOR CLEARLY LABEL ALL CONTROL PANELS FOR THE SUBSEA BOP SYSTEM FOR WELL-ABANDONMENT OPERATIONS?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: W**
30 CFR 250.442(h)

INSPECTION PROCEDURE:
Verify operator clearly labeled all control panels for the subsea BOP system.
Note: Verify the lights on the control panel are working properly.
IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if operator did not clearly label all control panels for the subsea BOP system.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per subsea BOP system inspected.

A-199 **DID THE OPERATOR DEVELOP AND USE A MANAGEMENT SYSTEM FOR OPERATING THE SUBSEA BOP SYSTEM, WHICH INCLUDES PROCEDURES FOR PREVENTION OF ACCIDENTAL OR UNPLANNED DISCONNECTS OF SYSTEM FOR WELL-ABANDONMENT OPERATIONS?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: S**
30 CFR 250.442(i)

INSPECTION PROCEDURE:
1.Verify management has written procedures for operating BOP stack and LMRP (including techniques to prevent accidental disconnections of these components).
2.Check all remote BOP control stations for by-pass to ensure all BOP functions work as designed.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (**S**) if
1. Operator does not have written procedures for operating BOP stack and LMRP (including techniques to prevent accidental disconnections of these components).
2. If any BOP control stations functions are in by-pass.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per subsea BOP system inspected.

A-200 **IS THE MARINE RISER DISPLACED WITH SEA WATER PRIOR TO REMOVAL FOR WELL-ABANDONMENT OPERATIONS?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: W**
30 CFR 250.442(k)

Note: Sufficient hydrostatic pressure must be maintained or other suitable precautions must be taken to compensate for the reduction in pressure and to maintain a safe and controlled well condition.
INSPECTION PROCEDURE:
Verify that the riser was properly displaced before removal.
IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if records indicate the riser was not displaced with seawater.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC for each inspection.

A-201 **DO THE RECORDS INDICATE THAT THE WELL-CELLAR IS AT THE APPROVED DEPTH TO ENSURE THAT THE TOP OF THE STACK IS BELOW THE DEEPEST PROBABLE ICE-SCOUR DEPTH FOR WELL-ABANDONMENT OPERATIONS?**

Authority: 30 CFR 250.1706(e) **Enforcement Action: S**
30 CFR 250.442(l)

INSPECTION PROCEDURE:
Check records to ensure that the well-cellar is at the approved depth.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (**S**) INC if the glory hole has not been excavated to the approved depth.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC for each well inspected.

SUBSEA BOP STUMP TEST

A-221 **DID OPERATOR TEST ALL ROV INTERVENTION FUNCTIONS ON THE SUBSEA BOP STACK WHILE CONDUCTING WELL-ABANDONMENT OPERATION DURING THE STUMP TEST?**

Authority: 30 CFR 250.1707(h)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to verify

1. Operator conducted ROV intervention function test during the stump test.
2. ROV hot stab was capable of actuating at a minimum one set of pipe rams, one set of blind shear rams, and unlatching the LMRP.

Note: Check records to verify that operator tested all ROV intervention functions in accordance with test procedures in the approved APM. Test pump may be used as long as the capabilities of the test pump do not exceed the capabilities of the ROV.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) if operator did not conduct a function test during the stump test and ROV hot stab was not capable of actuating at a minimum one set of pipe rams, one set of blind shear rams, and unlatching the LMRP.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea BOP system inspected.

A-222 **DID OPERATOR TEST AT LEAST ONE SET OF RAMS ON THE SUBSEA BOP STACK WHILE CONDUCTING WELL-ABANDONMENT OPERATION UPON ITS INITIAL INSTALLATION ON THE SEAFLOOR USING THE ROV?**

Authority: 30 CFR 250.1707 (h)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to verify operator

1. Verify that the ROV is fully compatible with BOP ROV intervention panels.
2. Tested at least one set of pipe rams on the subsea BOP stack upon its installation on the seafloor in accordance with the test procedures and approved APD or APM
3. Submitted test procedures with your APM for District Manager approval.

Note: Check records to verify that operator tested one set of rams on the subsea BOP stack upon its installation on the seafloor in accordance with the test procedures and approved APM.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) if operators did not conduct a test on at least one set of rams on the subsea BOP stack upon its initial installation on the sea floor.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea BOP system inspected.

A-223 **DID OPERATOR CONDUCT A FUNCTION TEST ON THE DEADMAN SYSTEM AND VERIFY CLOSURE OF AT LEAST ONE SET OF BLIND SHEAR RAMS DURING THE INITIAL TEST ON THE SEAFLOOR BEFORE CONDUCTING WELL-ABANDONMENT OPERATIONS?**

Authority: 30 CFR 250.1707 (h)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify the function test on deadman system was in accordance with the approved APM.

Note: Records must be made available during inspection

IF NONCOMPLIANCE EXISTS:

Issue a rig shut in (**S**) if operator did not conduct a function test deadman system and verify closure of at least one set of blind-shear rams in accordance with the approved APM.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea BOP system inspected.

A-224 **DID OPERATOR CONDUCT A FUNCTION TEST ON THE AUTOSHEAR AND DEADMAN SYSTEMS ON THEIR SUBSEA BOP STACK BEFORE CONDUCTING WELL-ABANDONMENT OPERATIONS DURING THE STUMP TEST?**

Authority: 30 CFR 250.1707(h)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify the function test on autoshear and deadman systems were in accordance with the approved APM.

Note: Records must be made available inspection.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut in (**S**) if operator did not conduct a function test on autoshear and deadman systems in accordance with the approved APM.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea BOP system inspected.

BOP TESTS, ACTUATORS, INSPECTIONS, AND MAINTENANCE

A-240 **AFTER EACH WELL DRILLED, DID OPERATOR CLEAN, VISUALLY INSPECT, PERFORM PREVENTIVE MAINTENANCE, AND PRESSURE TEST WELL-CONTROL EQUIPMENT BEFORE INSTALLATION ON THE NEXT WELL IN ACCORDANCE WITH API RP 53 SECTION 17.10 AND 18.10?**

Authority: 30 CFR 250.1708(a)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to verify that operator cleaned, visually inspect, performed preventive maintenance, and pressure test the well control equipment before installation on the next well.

Note: Well control equipment applies to both surface and subsea.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut in (**S**) INC if operator did not clean, visually inspect, performed preventive maintenance and pressure test the well control equipment before installation on the next well.

. **INSPECTION COUNT/ INC COUNT**

Enter one item checked/ issue one INC per subsea BOP system inspected.

A-241 **ARE ALL BOP STACKS, CHOKE MANIFOLDS, AND DIVETER COMPONENTS USED DURING WELL ABANDONMENT OPERATIONS, DISASSEMBLED AND INSPECTED IN ACCORDANCE WITH THE EQUIPMENT MANUFACTURER'S GUIDELINES AFTER EVERY 3-5 YEARS OF SERVICE IN ACCORDANCE WITH API RP 53 SECTION 17.10 AND 18.10?**

Authority: 30 CFR 250.1708(a) (1) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

Verify that

1. Elastomer components have been changed out
2. Surface finishes have been examined for wear and corrosion
3. Critical dimensions should be checked against the manufactures allowable wear limits.
4. A full internal and external inspection of the flexible choke and kill lines should be performed in accordance with the equipment manufacturers

Note: Records must be maintained on the rig for two years or from the date of you last major inspection, whichever is longer.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if the component (BOP stack, Choke Manifold, and Diverter) has been found to be in violation but is no longer in use.

Issue a rig shut-in **(S)** INC when operator has not disassembled and inspected all BOP stacks, choke manifolds, and diverter components in accordance with the equipment manufacturer's guidelines after every 3-5 years of service.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-242 **IS THE ABANDONMENT BOP SYSTEMS AND MARINE RISER INSPECTED EVERY 3 DAYS, WEATHER AND SEA CONDITIONS PERMITTING?**

Authority: 30 CFR 250.1708(a) (2) **Enforcement Action: W**

Note:

1. Weather and sea conditions are allowable reasons for not inspecting subsea BOP systems and marine risers EVERY 3 DAYS.
2. You may use television camera to inspect this equipment

INSPECTION PROCEDURE:

Verify that the BOP systems and marine risers have been visually inspected by checking the driller's report.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC when the operator cannot verify that the BOP system is visually inspected as required.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per subsea BOP system inspected

A-243 **ARE MANUFACTURER'S INSTALLATION, OPERATION, AND MAINTENANCE (IOM) MANUALS AVAILABLE ON THE RIG FOR ALL THE BOP EQUIPMENT INSTALLED ON THE RIG DURING WELL ABANDONMENT OPERATIONS IN ACCORDANCE WITH API RP 53 17.11 AND 18.11?**

Authority: 30 CFR 250. 1708 (b) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that Manufacturer's installation, operation, and maintenance (IOM) manuals are available on the rig for all the well completion BOP equipment installed on the rig

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC if the manufacturer's installation, operation, and maintenance (IOM) manuals are not available on the rig for all the BOP equipment installed on the rig

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-244 **IS A PLANNED MAINTENANCE SYSTEM , WITH EQUIPMENT IDENTIFIED, TASKS SPECIFIED, AND THE TIME INTERVALS BETWEEN TASKS STATED, EMPLOYED ON EACH RIG AND ARE THEY MAINTAINED ON FILE AT THE RIG SITE OR READILY AVAILABLE FOR THE APPLICABLE WELL ABANDONMENT BOP EQUIPMENT IN ACCORDANCE WITH API RP 53 17.12 AND 18.12?**

Authority: 30 CFR 250. 1708 (b) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify a planned maintenance system, with equipment identified, tasks specified, and the time intervals between tasks stated, employed on each rig and are they maintained on file at the rig site or readily available for the applicable well abandonment BOP equipment.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if they are not following the planned maintenance system.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A- 245 **DOES OPERATOR MAINTAIN COPIES OF EQUIPMENT MANUFACTURERS' PRODUCT ALERTS OR EQUIPMENT BULLETINS AT THE RIG SITE IN ACCORDANCE WITH API RP 53 SECTIONS17.12 AND 18.12?**

Authority: 30 CFR 250. 30 CFR 250. 1708 (b) **Enforcement Action: S**

INSPECTION PROCEDURE

Verify operator has copies of equipment manufacturers' product alerts or equipment bulletins at the rig site and readily made available to BSEE upon request.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if operator does not have copies of equipment manufacturers' product alerts or equipment bulletins at the rig site and are not made available to BSEE upon request.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

A-246 BEFORE DISPLACING KILL-WEIGHT DRILLING FLUID FROM THE WELLBORE AND/OR RISER, DID OPERATOR OBTAIN APPROVAL FROM THE DISTRICT MANAGER?

Authority: 30 CFR 250. 30 CFR 250.1709 **Enforcement Action: S**
30 CFR 250.420(b)(3)

INSPECTION PROCEDURE:

Check records to verify

1. Approval from District Manager included the reasons for displacing kill-weight drilling fluid and had a detail step by step procedure for conducting the displacement.
2. Step by step displacement procedures address the following:
   a. number and type of independent barriers that are in place for each flow path,
   b. tests you will conduct to ensure integrity of independent barriers,
   c. BOP procedures you will use while displacing kill-weight fluids, and
   d. procedures you will use to monitor volumes and rates of fluids entering and leaving the wellbore;

Note: Records must be made available during inspection.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) if operator did not receive approval from District Manager before displacing kill-weight drilling fluid from the wellbore.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per surface & subsea BOP system inspected.