NATIONAL OFFICE POTENTIAL INCIDENT OF NONCOMPLIANCE (PINC) LIST

LAST UPDATE November 2012

PREFACE

The Safety and Enforcement Branch of the Engineering and Operations Division wish to extend our appreciation to all participating BSEE and BOEM personnel for their dedicated effort and expertise in
developing this edition of the National Office PINC List.

PINC NUMBER: A unique identifier for the specific requirement.

PINC STATEMENT: The clear and concise description of the requirement.

AUTHORITY: The regulatory authority as found in the Code of Federal Regulations.

ENFORCEMENT ACTION: This is the enforcement action(s) that must be taken by BSEE or BOEM for an identified violation(s) of the regulations. Enforcement action(s) may result in a complete facility shut-in **(S)**, a component shut-in **(C),** or a warning **(W).** A substantial number of the Potential Incidents of Noncompliance (PINCs) provide enforcement actions in all three enforcement categories [W/C; W/C/S]. Multiple enforcement action(s) [W/C; W/C/S] may be issued to document severity of identified violations. When multiple enforcement actions [W/C or W/C/S] are provided in the PINC, the criteria for each level of enforcement action are provided in the "IF NONCOMPLIANCE EXISTS" section of the PINC.

RATIONALE/NOTE: Additional information describing the basis or providing background information pertinent to the requirement stated in the "PINC Statement" block.

DEFINITION: Definitions of terms used in the PINC.

INSPECTION PROCEDURE: Preferred detailed guidelines to be used by BSEE or BOEM personnel to ensure that the stated requirement is met. **However, the guidelines in this document are to be considered the preferable method of implementing the enforcement of each PINC and not intended as a directive or to supersede the regulatory language in the Code of Federal Regulations.**

> **INSPECTION COUNT:** Describes the number of items checked to be entered on the inspection form. An incident of noncompliance (INC) must be issued to document any negative (no) answer to a PINC statement.
> Examples:
>
> **1. Enter one item checked per facility inspected.**
> One (1) is entered in the "# CK" column on the inspection form and answered one [1] in the "#Y" or "#N".
>
> **2. Enter one item checked for each safety device inspected.**
> A total count of the number of safety devices, components, wells, etc., is entered in the "#CK" column on the inspection form. The total entries in the "#Y", "#N", and "#N/A" columns must correspond to the total count in the "#CK" column.

IF NONCOMPLIANCE EXISTS: Describes the specific enforcement action to be taken for each identified violation and the severity level of each violation of the regulations. Examples:

1. Issue a warning **(W)** incident of noncompliance when the situation poses no immediate danger to personnel or equipment.

2. Issue a component **(C)** incident of noncompliance for a specific piece of equipment or location when it is determined to be part of an unsafe situation or it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.

3. Issue a structure **(S)** incident of noncompliance when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INCIDENT(S) OF NONCOMPLIANCE TO BE ISSUED/ INC COUNT: Dictates the specific number of incident(s) of noncompliance to be issued for identified violation(s) of the regulations. Examples:

1. **Issue one incident of noncompliance for each facility inspected.**
   One (1) incident of noncompliance is issued on each facility inspected with detailed bullet descriptions of the identified violations. Exception to the one incident of noncompliance per facility inspected rule is when multiple enforcement actions [W/C or W/C/S] are provided in the PINC. PINCs with multiple enforcement action(s) [W/C; W/C/S] may dictate that multiple incidents of noncompliance are issued per facility to document severity levels of violations. Such cases will result in the issuance of one incident of noncompliance for the appropriate selected enforcement action with detailed bullet descriptions of the identified violations.

2. **Issue one incident of noncompliance for each safety device inspected.**
   One (1) incident of noncompliance is issued for each safety device, component, well, etc., that is determined to be in violation of the regulations.

Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC must indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC will normally be issued, since a shut-in would serve no useful purpose. However, an after-the-fact INC that may result in Civil Penalty Review (CPR) recommendation should be issued with the appropriate shut-in enforcement action.

ACRONYMS USED

Enforcement Actions

W - Warning
C - Component Shut-in
S - Facility (Platform/Rig/Operation) Shut-in

Other Acronyms:

APD - Application for Permit to Drill (form BSEE-123)
API - American Petroleum Institute
APM - Application for Permit to Modify (form BSEE-124)
CFR - Code of Federal Regulations
DOCD - Development Operations Coordination Document
DOI - Department of the Interior
EOR - End of Operations Report
G&G - Geological and Geophysical
INC - Incident of Noncompliance
MAOP - Maximum Allowable Operating Pressure
BOEM - Bureau of Ocean Energy Management
MODU - Mobile Offshore Drilling Unit
MPMS - Manual of Petroleum Standards
MPR - Maximum Production Rate
OCS - Outer Continental Shelf
PINC - Potential Incident of Noncompliance
POE - Plan of Exploration
ROW - Right-of-Way
SAC - Safety Analysis Checklist
SAFE - Safety Analysis Function Evaluation
TIMS - Technical Information Management System
TVD - True Vertical Depth

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GENERAL
OPERATIONS
Update Last – 2012

G-801 **ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS?**

Authority: 30 CFR 250.101 **Enforcement Action: W/C/S**
30 CFR 250.1710
30 CFR 250.1725(a)

INSPECTION PROCEDURE:
Verify that operations are being conducted in accordance with the lease stipulation.

IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for an audit of one or more operations on a facility if the violation(s) of the stipulation(s) poses no immediate danger to personnel, equipment, or the environment.
Issue one component shut-in **(C)** INC for an audit of one or more operations on a facility if the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment; and operation(s) can be shut-in without affecting the overall safety of the facility.
Issue one facility shut-in **(S)** INC if a violation of the stipulation poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per lease audited.

G-802 **ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED APPLICATIONS?**

Authority: 30 CFR 250.300(b)(2) **Enforcement Action: W/C/S**
30 CFR 250.410
30 CFR 250.802
30 CFR 250.1202(a)(1)
30 CFR 250.1204(a)
30 CFR 250.513
30 CFR 250.613
30 CFR 250.615
30 CFR 250.1712
30 CFR 250.1725

INSPECTION PROCEDURE:
Verify that operations are being conducted in accordance with the approved application, i.e., APDs, APMs, SAFE, and SAC charts, etc.

IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for an audit of one or more operations on a facility if the violation(s) of the application(s) poses no immediate danger to personnel, equipment, or the environment.
Issue one component shut-in **(C)** INC for an audit of one or more operations if the violation(s) of the application(s) poses an immediate danger to personnel, equipment, or the environment and it can be shut-in without affecting the overall safety of the facility.
Issue one facility shut-in **(S)** INC if a violation of the application poses an immediate danger to the entire facility, personnel, or the environment; and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.
Note: Do not issue an INC when the operator's safety devices, systems, and equipment are installed and function in accordance with an approved "IN ERROR BY THE PRODUCTION ENGINEER" SAFE chart and Flow Diagram. Approvals made in error by BSEE will be communicated to the operators by the production engineer.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per lease audited.

G-803 **ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED PLANS?**

Authority: 30 CFR 250.200 **Enforcement Action: W/C/S**
30 CFR 254.2

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., POE's, DOCD's, Oil Spill Response Plans.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in **(C)** INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

ARCHAEOLOGICAL

G-808 **DOES THE ARCHAEOLOGICAL REPORT SUGGEST THAT ARCHAEOLOGICAL RESOURCES MAY BE PRESENT AND IS THE LOCATION OF THE SITE OF ANY OPERATION LOCATED SO AS TO NOT ADVERSELY AFFECT THE AREA OF THE RESOURCE?**

Authority: 30 CFR 250.194(a)(1) **Enforcement Action: W/C/S**
30 CFR 250.194(c)
30 CFR 250.1010(c)

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., EP's, DOCD's, DPP, etc.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in **(C)** INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked / issue one INC per audit.

G-809 **DOES THE LESSEE'S DISCOVERY OF ANY ARCHAEOLOGICAL RESOURCES IN THE LEASE AREA IMMEDIATELY RESULT IN HALTING OPERATIONS AND TAKING STEPS TO PROTECT SIGNIFICANT RESOURCES AND REPORTING THE DISCOVERY TO THE REGIONAL DIRECTOR?**

Authority: 30 CFR 250.194(a)(1) **Enforcement Action: W/C/S**
30 CFR 250.194(c)
30 CFR 250.1010(c)

INSPECTION PROCEDURE:
Verify that operations are being conducted in accordance with the approved plans, e.g., EP's, DOCD's, DPP, etc.

IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.
Issue one component shut-in **(C)** INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.
Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

INSPECTION COUNT/ INC COUNT:
Enter one item checked / issue one INC per audit.

RECORDS

Update Last – 2012

G-811 **IS REQUIRED PAPERWORK SUBMITTED IN THE TIME FRAME REQUIRED FOR ALL ACTIVITIES OR OPERATIONS AS SPECIFIED BY REGULATIONS?**

Authority: 30 CFR 250.140(a)
30 CFR 250.465 **Enforcement Action: W/C**
30 CFR 250.468
30 CFR 250.513(a)
30 CFR 250.613(a)
30CFR 250.613(d)
30 CFR 250.900 (e)
30 CFR 250.920(e)
30 CFR 250.1008
30 CFR 250.1202(c)(4)
30 CFR 250.1202(d)(5)
30 CFR 250.1202(f)(2)
30 CFR 250.1203(b)(8)
30 CFR 250.1203(b)(9)
30 CFR 250.1704
30 CFR 250.1721(g)
30 CFR 250.1743
30 CFR 251.4
30CFR 251.8(2)

INSPECTION PROCEDURE:
Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted.
Issue one component shut-in **(C)** INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

INSPECTION COUNT/ INC COUNT: Enter one item checked/
issue one INC per report audited.

PLATFORMS AND STRUCTURES

G-821 **HAVE THE PLATFORMS AND STRUCTURES BEEN DESIGNED, FABRICATED, INSTALLED, USED, INSPECTED, AND MAINTAINED TO ENSURE ITS STRUCTURAL INTEGRITY FOR SAFE CONDUCT OF DRILLING, WORKOVER, AND PRODUCTION OPERATIONS?**

Authority: 30 CFR 250.900(a) **Enforcement Action: W**
30 CFR 250.900(b)

Note: Use this PINC where no other PINC for platforms and structures applies.

INSPECTION PROCEDURE:

Verify that the platforms and structures have been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity for safe conduct of drilling, workover, and production operations.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a facility if the platforms and structures have not been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per platform and structure audited.

G-822 **DOES THE LESSEE COMPILE, RETAIN, AND MAKE AVAILABLE PLATFORM STRUCTURAL RECORDS FOR THE LIFE OF THE PLATFORM, INCLUDING THE RESULTS OF PLATFORM STRUCTURAL INSPECTIONS?**

Authority: 30 CFR 250.919 **Enforcement Action: W**
30 CFR 250.903

INSPECTION PROCEDURE:

1. Review operator records to verify that the records for each platform are available.
2. Verify that the lessee maintains for the functional life of the platform the following records:
   A. The as-built structural drawings.
   B. The design assumptions and analyses.
   C. A summary of the nondestructive examination records.
   D. The inspection results from platform inspections. 3.

Verify that the records for each inspection include:
   A. The type of inspection employed (e.g., visual, magnetic particle, or ultrasonic testing).
   B. A summary of the testing results.
   C. What repairs, if any, were needed.
   D. What repairs were made.
   E. The overall structural condition of the platform.

4. Verify that the platform has been inspected at intervals required by BSEE.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a facility if operator records:
1. Are not available.
2. Do not contain all of the required information.
3. Do not indicate that the inspections were performed at the required frequency.

INSPECTION COUNT/ INC COUNT: Enter one item checked/ issue one INC per structure audited.

G-823 **HAS THE OPERATOR PERFORMED THE REQUIRED STRUCTURAL SURVEYS FOR THE PLATFORM AND SUBMITTED A REPORT OF THE RESULTS ANNUALLY BY NOVEMBER 1 TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.919 **Enforcement Action: W**

INSPECTION PROCEDURE:

Review records in TIMS and documentation submitted by operator and others to determine if the platform is in compliance with the structural survey inspection and reporting requirements.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a records audit of a facility if records indicate that the existing platform was not in compliance with the structural survey inspection and reporting requirements. *(New Office PINC proposed by Office of Structural & Technical Support.)*

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per survey audited.

BONDING

G-831 **DOES THE LESSEE MAINTAIN THE APPROPRIATE BOND REQUIRED?**

Authority: 30 CFR 256.52 **Enforcement Action: W/S**
30 CFR 256.53
30 CFR 256.54

INSPECTION PROCEDURE:

1. Verify that the general bond complies with the levels of development on the lease.
2. Verify that the supplemental bond complies with BSEE requirements.
3. Verify, using Treasury Circular 570, that the Surety is capable of providing a bond for the dollar amount in question.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of bonding coverage if bonding requirements are not met.
Issue one facility shut-in **(S)** INC for one or more facilities on a lease if bonding requirements are not met within the time specified for correction.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per bond audited.

G-832 **IF A BOND LAPSES OR DECREASES IN VALUE DURING THE TERM OF THE REQUIRED FINANCIAL COVERAGE, HAS THE LESSEE PROVIDED ACCEPTABLE ALTERNATIVE FINANCIAL COVERAGE TO THE REGIONAL DIRECTOR?**

Authority: 30 CFR 256.52(e) **Enforcement Action: W/S**
30 CFR 256.55
30 CFR 256.56
30 CFR 256.57

INSPECTION PROCEDURE:

1. If the value of a bond submitted as security to BSEE has decreased in value, verify the lessee has provided evidence of additional alternative financial security to the Regional Director within 6 months or such shorter period of time as the Regional Director may direct.
2. If a bond submitted as security to BSEE has lapsed during the required term of the coverage, verify that acceptable alternative financial security is promptly provided to the Regional Director.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of bonding coverage if acceptable alternative financial coverage was not provided, but has since been submitted.
Issue one facility shut-in **(S)** INC for one or more facilities covered by a required bond if acceptable alternative financial coverage was not provided within the specified time period to the Regional Director.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease audited.

G-833 **HAS THE LESSEE NOTIFIED THE REGIONAL DIRECTOR WITHIN 72 HOURS AFTER LEARNING THAT AN ACTION WAS FILED ALLEGING THAT THE LESSEE, THE SURETY, OR THE GUARANTOR PROVIDING REQUIRED FINANCIAL SECURITY ARE INSOLVENT OR BANKRUPT?**

Authority: 30 CFR 256.55(b) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that the Regional Director was notified within 72 hours after the lessee learned an action was filed alleging that the lessee, the surety, or the guarantor are bankrupt or insolvent.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of required financial coverage if the Regional Director was not notified as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease audited.

TRAINING

Update Last – 2012

G-841 **HAS A WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM BEEN ESTABLISHED AND IMPLEMENTED?**

Authority: 30 CFR 250.1503(a) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that the lessee has established and implemented a training program. **IF NONCOMPLIANCE EXISTS:**

Issue one facility shut-in **(S)** INC for an audit of a lessee's training program if the training program for well-control and production safety duties is not established and implemented. **Note:** The one or more affected facilities of the lessee is the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

G-842 **CAN THE LESSEE EXPLAIN ITS OVERALL WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM AND PRODUCE EVIDENCE TO SUPPORT THE EXPLANATION DURING A TRAINING SYSTEM AUDIT CONDUCTED BY BSEE OR ITS AUTHORIZED REPRESENTATIVE?**

Authority: 30 CFR 250.1507(a) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify during audit that the lessee can explain its overall training program and produce evidence to support the explanation.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a training system audit if the lessee cannot explain its overall training program and produce evidence to support the explanation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

G-843 **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?**

Authority: 30 CFR 250.1503(b)(1) **Enforcement Action: W**
30 CFR 250.1507(a)

INSPECTION PROCEDURE:

1.) Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices.

2.) Verify that procedures are being followed by reviewing employee records.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices or documentation fails to support that the procedures are being implemented.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-844 **DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE TYPE, METHOD(S), LENGTH, FREQUENCY, AND CONTENT OF THE TRAINING FOR EMPLOYEES?**

Authority: 30 CFR 250.1503(b) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that lessee's training plan specifies the type, method(s), length, frequency, and content of the training for employees.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the type, method(s), length, frequency, and content of the training for employees.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-845 **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?**

Authority: 30 CFR 250.1503(b)(4) **Enforcement Action: W**
30 CFR 250.1507(a)

INSPECTION PROCEDURE:

1.) Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis.

2.) Verify through records review that the procedures are being implemented.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis or documentation fails to support that the procedures are being implemented.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-846 **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS AND IS THERE EVIDENCE THAT THE EVALUATIONS ARE BEING CONDUCTED AS PER THE PROCEDURES?**

Authority: 30 CFR 250.1503(b)(2) **Enforcement Action: W**
30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify

1. Verify that lessee's training plan includes procedures for evaluating the training programs of contractors.
2. Verify through records review that evaluations are being conducted as per the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors or documentation fails to indicate that the contractor evaluations are being conducted?

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-847 **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS AND IS THERE EVIDENCE THAT THE INTERNAL AUDITS ARE BEING CONDUCTED AS PER PROCEDURES?**

Authority: 30 CFR 250.1503(b)(6) **Enforcement Action: W**
30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify

1.) Verify that lessee's training plan includes procedures for internal audits.

2.) Verify through records review that the internal audits are being conducted as per the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits or documentation fails to indicate that the internal audits are being conducted.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-848 **DOES THE LESSEE PROVIDE A COPY OF ITS TRAINING PLAN WHEN REQUESTED BY BSEE REGIONAL OR DISTRICT SUPERVISOR?**

Authority: 30 CFR 250.1503(c)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that a training plan is provided when requested by BSEE Regional or District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one facilities shut-in **(S)** INC for an audit of a lessee's training program if the lessee fails to provide the training plan when requested by BSEE Regional or District Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-849 **DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE METHOD(S) OF VERIFYING EMPLOYEES' UNDERSTANDING AND PERFORMANCE?**

Authority: 30 CFR 250.1503(b) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that lessee's training plan specifies the method(s) of verifying employees' understanding and performance.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the method(s) of verifying employees' understanding and performance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-850 **ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES AND IS THERE EVIDENCE INDICATING THAT THE KNOWLEDGE AND SKILLS ARE BEING VERIFIED?**

Authority: 30 CFR 250.1506(b) **Enforcement Action: W**
30 CFR 250.1507(a)

INSPECTION PROCEDURE:

1.) Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.
2.) Verify through records review that procedures are being followed.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties or documentation fails to indicate that procedures are being followed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

G-851 **DOES THE LESSEE ENSURE (EITHER THROUGH THE CONTRACTOR EVALUATION OR OTHER METHOD THAT THE CONTRACTOR'S TRAINING PROGRAM PROVIDE FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?**

Authority: 30 CFR 250.1506(c) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that the lessee has ensured that contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the lessee has not insured either through the contractor evaluation or other method that the contractor's training plan if contractor's training program does not provide for periodic training and verification of well-control or production safety knowledge and skills.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

G-852 **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES AND IS THERE EVIDENCE THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL HAVE BEEN VERIFIED IN ACCORDANCE WITH THE PROCEDURES?**

Authority: 30 CFR 250.1503(b)(3) **Enforcement Action: W**
30 CFR 250.1507(a)

INSPECTION PROCEDURE:

1. .Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties.
2. Verify through records review that all employees and contractor personnel have been verified in accordance with the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform well control and production safety operations, can perform their assigned duties or documentation does not indicate that the verification procedures are being followed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

G-853 **ARE ALTERNATIVE WELL-CONTROL AND PRODUCTION SAFETY TRAINING METHODS CONDUCTED IN ACCORDANCE WITH, AND MEET, THE OBJECTIVES OF THE TRAINING PLAN?**

Authority: 30 CFR 250.1503(a) **Enforcement Action: W**
30 CFR 250.1504

Note: Alternative methods may include computer-based learning, films, or their equivalent. This type of training should be reinforced by appropriate demonstrations and hands-on training.

INSPECTION PROCEDURE:

Verify that alternative methods conducted are in accordance with, and meet, the objectives of the training plan.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if alternative training methods conducted are not in accordance with, and meet, the objectives of the training plan.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-854 **IS WELL-CONTROL AND PRODUCTION SAFETY TRAINING FOR EMPLOYEES PROVIDED FROM SOURCES THAT MEET THE REQUIREMENTS OF THE TRAINING PLAN?**

Authority: 30 CFR 250.1503(a) **Enforcement Action: W**
30 CFR 250.1505

INSPECTION PROCEDURE:

Verify that training for employees is from sources that meet the requirements of the training plan.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if training for employees is not provided from sources that meet the requirements of the training plan.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-855 **IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?**

Authority: 30 CFR 250.1506(a) **Enforcement Action: W/C**

INSPECTION PROCEDURE:

1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
2. Verify through record reviews that periodic training is conducted to ensure that employees maintain understanding of and competency in, well-control or production safety practices.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

Issue one component shut-in **(C)** INC for each employee that has not received is not provided periodic training (in accordance with plan) to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.

Note: The employee is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

G-856 **DOES EACH EMPLOYEE OR CONTRACT PERSONNEL UNDERSTAND AND PERFORM THE ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?**

Authority: 30 CFR 250.1503(a) **Enforcement Action: W/C**
30 CFR 250.1503(b)(3) 30 CFR 250.1504 30 CFR 250.1506(b) 30 CFR 250.1507(c) 30 CFR 250.1507(d)

INSPECTION PROCEDURE:

1. Verify that lessee's training plan provides a process to ensure that employees and contract personnel understand and can perform their assigned well-control or production safety duties.
2. Verify (either through written, hands-on, or oral testing) that employees understand and can perform their assigned well-control or production safety duties.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more employees/contract personnel if the training plan fails to provide a process to ensure that employees understand and can perform assigned well-control or production safety duties. Issue one component shut-in **(C)** INC for one or more employees/contract personnel that fail to demonstrate either through written, hands-on, or oral testing, their ability to perform the assigned well-control or production duties.

Note: The employee/contract personnel is the component.

INSPECTION COUNT/INC COUNT:

Enter one item checked/issue on INC per training plan audited.

G-857 **DOES THE LESSEE ALLOW BSEE OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN, ORAL, HANDS-ON WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?**

Authority: 30 CFR 250.1507(c) **Enforcement Action: W**
30 CFR 250.1508(a)

INSPECTION PROCEDURE:

Verify that BSEE or its authorized representative is allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if BSEE or its authorized representative is not allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

G-858 **DOES THE LESSEE ALLOW BSEE OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER OR WITNESS HANDS-ON, SIMULATOR, OR OTHER TYPES OF WELL-CONTROL AND PRODUCTION SAFETY TESTING?**

Authority: 30 CFR 250.1507(d) **Enforcement Action: W**
30 CFR 250.1509(a)

INSPECTION PROCEDURE:

Verify that BSEE or its authorized representative is allowed to administer or witness testing.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if BSEE or its authorized representative is not allowed to administer or witness testing.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

G-859 **DOES THE LESSEE PAY FOR ALL COSTS ASSOCIATED WITH WELL-CONTROL OR PRODUCTION SAFETY TESTING, EXCLUDING SALARY AND TRAVEL COSTS FOR BSEE PERSONNEL?**

Authority: 30 CFR 250.1507(d) **Enforcement Action: W 30**
30 CFR 250.1509(c)

INSPECTION PROCEDURE:

Verify that the lessee pays for all costs associated with testing, excluding salary and travel costs for BSEE personnel.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the lessee fails to pay for all costs associated with testing, excluding salary and travel costs for BSEE personnel.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

G-860 **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR RECORD KEEPING AND DOCUMENTATION OF WELL-CONTROL AND PRODUCTION SAFETY TRAINING?**

Authority: 30 CFR 250.1503(b)(5) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for record keeping and documentation.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for record keeping and documentation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

G-861 **DOES THE LESSEE IDENTIFY PERSONNEL BY CURRENT POSITION, YEARS OF EXPERIENCE IN PRESENT POSITION, YEARS OF TOTAL OIL FIELD EXPERIENCE, AND EMPLOYER NAME, AT THE WORK SITE OR ONSHORE LOCATION?**

Authority: 30 CFR 250.1508(b) **Enforcement Action: W**
30 CFR 250.1509(b)

INSPECTION PROCEDURE:

Verify that lessee records identify well-control and production safety personnel by current position, years of experience in present position, years of total oil field experience, and employer name (e.g., operator, contractor, or subcontractor name).

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program if lessee records fail to identify well control and production safety personnel by current position, years of experience in present position, years of total oil field experience, and employer name.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

G-862 **DOES THE LESSEE PROVIDE COPIES OF TRAINING DOCUMENTATION FOR PERSONNEL INVOLVED IN WELL-CONTROL OR PRODUCTION SAFETY OPERATIONS FOR THE PAST FIVE YEARS WHEN REQUESTED BY BSEE REGIONAL OR DISTRICT MANAGER?**

Authority: 30 CFR 250.1503(c)(1) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that training documentation was provided when requested by BSEE Regional or District Manager.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a lessee's training program for each request if the lessee failed to provide the training documentation when requested by BSEE Regional or District Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

G-863 **DID OPERATOR ESTABLISH MINIMUM REQUIREMENTS FOR PERSONNEL INVOLVED IN WELL CONTROL AUTHORIZED TO OPERATE CRITICAL SUBSEA BOP EQUIPMENT?**

Authority: 442(j) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that personnel

1. Are trained in deepwater well control theory and practice in accordance with operator's Subpart O plan.
2. Have a comprehensive knowledge of subsea BOP hardware and control systems.

Note: Verification can include Subpart O audits, test, or interview.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if operator's management system does not have written procedures to ensure that personnel are knowledgeable to operate and maintain critical BOP components.

INSPECTION COUNT/ INC COUNT

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

G-864 **ARE ROV'S MAINTAINED ON A CONTINUOUS BASIS AND DID THE ROV CREW EXAMINE ALL ROV RELATED WELL CONTROL EQUIPMENT (BOTH SURFACE AND SUBSEA) TO ENSURE THAT IT IS PROPERLY MAINTAINED AND CAPABLE OF SHUTTING IN THE WELL DURING AN EMERGENCY?**

Authority: 442(e) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to verify that all ROV related well control equipment (both surface and subsea) has been inspected and maintained in accordance with manufacturer's maintenance requirements and is capable of shutting in the well during an emergency.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC if records do not indicate that the ROV crew was trained on the operation of the ROV.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per training program inspected.

G-865 **DOES OPERATORS MANAGEMENT SYSTEM INCLUDE MINIMUM KNOWLEDGE REQUIREMENTS FOR PERSONNEL AUTHORIZED TO OPERATE AND MAINTAIN CRITICAL SUBSEA BOP COMPONENTS?**

Authority: 442(i) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that operator's management system has written procedures to ensure that personnel are knowledgeable to operate and maintain critical BOP components.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) if operator's management system does not have written procedures to ensure that personnel are knowledgeable to operate and maintain critical BOP components.

INSPECTION COUNT/ INC COUNT

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

PRODUCTION REPORTING

G-881 **HAS THE OPERATOR SUBMITTED A REPORT TO THE DISTRICT SUPERVISOR OF INITIAL PRODUCTION FROM A LEASE?**

Authority: 30 CFR 250.180(a)(1) **Enforcement Action: W**
30 CFR 250.180(i)(1)

INSPECTION PROCEDURE:

Verify from records that initial production has started and that the District Supervisor has been notified of initial production from each lease within 5 days of initial production.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a production audit if the District Supervisor has not been notified within 5 days after initial production has been initiated on the lease.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease.

G-882 **HAS THE OPERATOR SUBMITTED A REPORT TO THE DISTRICT MANAGER OF CESSATION OF PRODUCTION ON A LEASE?**

Authority: 30 CFR 250.180(a)(1) **Enforcement Action: W**
30 CFR 250.180(i)(2)

INSPECTION PROCEDURE:

Verify from records that when production has ceased from a lease, the District Supervisor has been notified within 15 days after the first full month of zero production.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a production audit if the District Supervisor has not been notified within 15 days after the first full month of zero production on the lease.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease.

ACCIDENT REPORTING

G-891 **HAS THE DISTRICT MANAGER BEEN NOTIFIED WITH A WRITTEN REPORT WITHIN 15 DAYS OF THE INCIDENT INVOLVING ALL: FATALITIES, INJURIES INVOLVING LOST TIME AND EVACUATION, LOSS OF WELL CONTROL, FIRES, EXPLOSIONS, H2S RELEASES AS DEFINED BY 30 CFR 250.490(1), COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS, SAFETY SYSTEM DAMAGES, GAS RELEASES THAT INITIATE EQUIPMENT OR PROCESS SHUTDOWN, ALL INCIDENTS THAT RESULT IN DAMAGES GREATER THAT $25,000, AND ALL INCIDENTS THAT REQUIRE PERSONNEL TO MUSTER FOR EVACUATION?**

Authority: 30 CFR 250.187 **Enforcement Action: W**
30 CFR 250.188
30 CFR 250.190
30 CFR 250.191
30 CFR 250.490

INSPECTION PROCEDURE:

1. Verify that the DM has been notified of all the above listed incidents connected with any activities on a lease.
2. Verify that all reporting requirements listed in 30 CFR 250. 187,188,190,191,490 have been included and submitted to the DM in a written report within 15 days of the incident.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an incident/accident on a lease if the District Manager has not been notified by the lessee as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per incident audited.

G-892 **HAS THE DISTRICT MANGER BEEN VERBALLY NOTIFIED COMMUNICATION IMMEDIATELY FOLLOWING INCIDENTS INVOLVING ALL: FATALITIES, INJURIES REQUIRING EVACUATION, LOSS OF WELL CONTROL, FIRES, EXPLOSIONS,H_2S 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?**

Authority: 30 CFR 250.187 **Enforcement Action: W**
30 CFR 250.188
30 CFR 250.189
30 CFR 250.191
30 CFR 250.490

INSPECTION PROCEDURE:

1. Verify that the District Manager has been notified of all the above listed incidents connected with any activities on a lease.
2. Verify that all reporting requirements listed in 30 CFR 250.187,188,189,191,490 have been included and submitted to the District Manager via oral communication immediately following the above incident.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an incident/accident on a lease and/or OCS facility if the District Manager has not been notified by the lessee or operator as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per incident audited.

SAND & GRAVEL

G-900 **ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS?**
Authority: 30 CFR 282.14 **Enforcement Action: W/C**
INSPECTION PROCEDURE:
Verify that projects are being conducted in accordance with the lease stipulations.
IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for an audit of one or more operations on a project if the violation(s) of the stipulation(s) poses no immediate danger to personnel, equipment, or the environment. Issue one component shut-down **(C)** INC for an audit of one or more operations on a project if the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment; and operation(s) can be shut-down without affecting the overall safety of the project.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per lease audited.

ENVIRONMENTAL PROTECTION

OIL SPILL RESPONSE PLANS

E-801 **IS THE FACILITY OR PIPELINE COVERED BY AN APPROVED OIL SPILL RESPONSE PLAN OR A CERTIFICATION OF CAPABILITY TO RESPOND TO A WORST CASE DISCHARGE?**
Authority: 30 CFR 254.1(a) **Enforcement Action: S**
30 CFR 254.2(a)
30 CFR 254.2(b)
INSPECTION PROCEDURE
Verify that the facility or pipeline is covered by an **approved** Oil Spill Response Plan, or that a certification of capability to respond to a worse case discharge has been submitted to the Regional Supervisor.
IF NONCOMPLIANCE EXISTS
Issue a facility shut-in **(S)** INC if:
1. The facility or pipeline is not covered by an **approved** Oil Spill Response Plan, or a certification of capability to respond to a worse case discharge has not been submitted to the Regional Supervisor.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per facility and or pipeline audited.

E-802 **HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED OF RESULTS OF AN OIL SPILL PLAN REVIEW AND/OR RECEIVED REQUIRED REVISIONS TO THE OIL SPILL RESPONSE PLAN?**

Authority: 30 CFR 254.2(a) **Enforcement Action: W/S**
254.30(a)
254.30(b)
254.30(c)
254.30(d)
254.30(e)

INSPECTION PROCEDURE

Verify that the Oil Spill Response Plan:

1. Has been reviewed within two years from the last plan submittal date and that:
   a Necessary revisions were submitted to the Regional Supervisor or;
   b A finding of "no changes required" was submitted in writing to the Regional Supervisor.
2. Revisions have been submitted within 15 days whenever:
   a. A change occurs which significantly reduces the response capabilities.
   b. A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored, or transported at the facility.
   c. A change in the name(s) or capabilities of the oil spill removal organization cited in the plan.
   d. A significant change is made to the Area Contingency Plan(s).
3. Has been revised to include changes requested by the Regional Supervisor.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. The Regional Supervisor has not been notified of the biennial Oil Spill Response Plan review through either the receipt of plan revisions or correspondence stating that no changes to the plan were required.
2. Revisions to the Oil Spill Response Plan have not been submitted to the Regional Supervisor for approval within 15 days after significant changes which affect the plan have occurred.
3. Changes requested by the Regional Supervisor have not been made.

Issue a facility shut-in (S) INC if:

1. A warning **(W)** INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance within the timeframe as specified in the Warning INC.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

TRAINING

E-821 **HAS THE SPILL RESPONSE OPERATING TEAM COMPLETED REQUIRED TRAINING, AND ARE RECORDS BEING MAINTAINED?**

Authority: 30 CFR 254.2(a) **Enforcement Action: W/S**
254.5(a)
254.40
254.41(a)
254.41(d)
254.42(e)

INSPECTION PROCEDURE

Review the training records for members of the Spill Response Operating Team listed in the Oil Spill Response Plan to verify that:

1. Team members have attended annual hands-on training, including deployment and operation of the response equipment to be used.
2. Supervisory personnel have attended annual training in directing the deployment and use of the response equipment.
3. Records are being maintained for at least two years and are located at the site designated in the plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Members of the Spill Response Operating Team or Supervisory Personnel have not timely received the required training.
2. Training records are not being maintained as required.

Issue a facility shut-in (S) INC if:

A warning **(W)** INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

E-822 **HAS THE SPILL MANAGEMENT TEAM COMPLETED REQUIRED TRAINING, AND ARE RECORDS BEING MAINTAINED?**

Authority: 30 CFR 254.2(a) **Enforcement Action: W/S**
254.5(a)
254.40
254.41(b)
254.41(c)
254.41(d)
254.42(e)

INSPECTION PROCEDURE

Review the training records of members of the Spill Management Team listed in the Oil Spill Response Plan to verify that:

1. Team members have attended annual training on locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment; spill reporting procedures; oil-spill trajectory analysis and predicting spill movement; any other responsibilities the spill management team may have.
2. Records are being maintained and are located at the site designated in the plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Members of the Spill Management Team have not timely received the required training.
2. Training records are not being maintained as required.

Issue a facility shut-in (S) INC if:

1. A warning **(W)** INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

EXERCISES

E-831 **WAS THE REGIONAL SUPERVISOR INFORMED 30 DAYS IN ADVANCE OF THE DATE OF THE SCHEDULED THE EXERCISE?**

Authority: 30 CFR 254.2(a) **Enforcement Action: W/S**
30 CFR 254.5(a)
30 CFR 254.42(f)

INSPECTION PROCEDURE

Verify that the Regional Supervisor was informed at least 30 days before the date of the following scheduled exercises:

1. Annual spill management team tabletop.
2. Annual deployment exercise of response equipment identified in the plan and that is staged at onshore locations.
3. Semiannual deployment exercise of any response equipment which the Regional Supervisor requires the operator to maintain at the facility or on dedicated vessels.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. The Regional Supervisor was not notified at least 30 days in advance of the scheduled exercise.

Issue a facility shut-in (S) INC if:

1. A warning **(W)** INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per exercise audited.

E-832 **ARE EXERCISES FOR ALL PARTS OF THE OIL SPILL RESPONSE PLAN CONDUCTED AT LEAST ONCE EVERY THREE YEARS, AND ARE RECORDS BEING MAINTAINED?**

Authority: 30 CFR 254.2(a) **Enforcement Action: W/S**
254.5(a)
254.40
254.42(a)
254.42(b)
254.42(c)
254.42(d)
254.42(e)

INSPECTION PROCEDURE

Review records to determine if:

1. The following annual exercises were conducted.
   a. Spill Management Team table-top.
   b. Response equipment deployment.
   c. Manned facility notification.
2. A semi-annual equipment deployment exercise for equipment on dedicated vessels or that required at a facility by the Regional Supervisor.
3. All parts of the entire Oil Spill Response Plan have been exercised during the triennial period.
4. Records are being maintained for at least the three-year cycle and are located at the site designated in the plan.

Note: Individual parts of the Oil Spill Response Plan may be exercised separately over the 3-year period.

IF NONCOMPLIANCE EXISTS

Issue a warning **(W)** INC if:

1. Exercises were not conducted within required time frames.
2. All parts of the Oil Spill Response Plan were not exercised at least once every 3years.
3. Records are not being maintained.

Issue a facility shut-in **(S)** INC if:

A warning **(W)** INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per exercise audited.

E-833 **DURING AN UNANNOUNCED OIL SPILL DRILL, DID THE OPERATOR SUCCESSFULLY DEMONSTRATE THE ABILITY TO IMMEDIATELY CARRY OUT PROVISIONS OF THE APPROVED OIL SPILL RESPONSE PLAN?**

Authority: 30 CFR 250.132(a) **Enforcement Action: W/S**

250.132(b)
254.2(a)
254.41(a)
254.41(b)
254.41(c)
254.41(d)
254.42(g)
254.42(h)

INSPECTION PROCEDURE

While conducting an on-site unannounced oil spill drill, use performance criterion from the National Preparedness for Response Exercise Program and evaluate the actions of the members of the spill management team, spill response operating team, and qualified individual; assess knowledge of the approved Oil Spill Response Plan; and compare actions taken during the drill to those listed in the approved Oil Spill Response Plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if during the exercise the operator:

1. Did not take **immediate** action to abate, control, contain, and remove the simulated oil discharge.
2. Did not immediately carry out the provisions of the approved Oil Spill Response Plan.
3. Failed to take all appropriate actions necessary to immediately abate the source of the simulated spill and remove any spills of oil.
4. Created conditions that would have posed unreasonable risk to the public health, life, property, aquatic life, wildlife, recreation, navigation, commercial fishing, or other uses of the ocean.

Issue a facility shut-in (S) INC if:

1. A warning **(W)** INC has been previously issued; the operator has not responded to BSEE requirements to correct the area of non-compliance; or the violation posed an immediate or imminent threat to life, property, or the built or natural environments.
2. In two successive unannounced drills, a warning **(W)** INC was issued after evaluation of the first drill and analysis of the second drill would have resulted in issuance of a warning **(W)** INC.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

OIL SPILL REPORTS

E-841 **ARE OBSERVED OIL DISCHARGES REPORTED BY THE OPERATOR?**

Authority:30 CFR 254.2(a) **Enforcement Action: W/S**
254.46(a)
254.46(b)
254.46(c)

INSPECTION PROCEDURE

Verify that all oil discharges:

1. Regardless or origin or size, were immediately reported to the National Response Center.
2. Of one barrel or more, from the operator's facility or pipeline, were orally reported without delay to the Regional Supervisor and that a written report was submitted within 15 calendar days after the discharge had stopped.
3. From another offshore facility were immediately reported to the Regional Supervisor and the responsible party.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Records indicate that an oil discharge was observed and not reported or not reported timely as required.
2. A written follow-up report for an oil spill of one barrel or more from the facility was not submitted to the Regional Supervisor within 15 days after the spillage has been stopped.
3. The operator failed to report spills of one barrel of more to the Regional Supervisor without delay.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility and/or pipeline audited.

E-842 **DURING AND FOLLOWING AN OIL DISCHARGE FROM A FACILITY AND/OR PIPELINE,WERE IMMEDIATE RESPONSE ACTIONS TAKEN AND WERE THEY CONSISTENT WITH THE APPROVED OIL SPILL RESPONSE PLAN?**

Authority: 250.132(a) **Enforcement Action: W/S**

250.132(b)
250.107(b)
250.300(a)(1)
254.2(a)
254.5(a) 254.5(c)
254.23(a)
254.23(b)
254.23(c)
254.23(d)
254.23(e)
254.23(f)
254.23(g) 254.40

INSPECTION PROCEDURE

After an oil discharge has occurred, review BSEE and responsible party-generated spill response reports, discuss response actions with representatives of the Federal On-Scene coordinator, obtain information from oil spill removal organizations, and obtain additional data from the responsible party and/or members of the Incident Command Team, as required. If deployed to the Incident Command Post during the response, prepare detailed observations of real-time response activities. Compare collected data to that contained in the approved Oil Spill Response Plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if the operator:

1. Did not take immediate action to abate, control, contain, and remove the oil discharge.
2. Did not immediately carry out the provisions of the approved Oil Spill Response Plan.
3. Failed to take all appropriate actions necessary to immediately abate the source of the spill and remove any spills of oil.
4. Created conditions that posed unreasonable risk to the public health, life, property, aquatic life, wildlife, recreation, navigation, commercial fishing, or other uses of the ocean.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued; the operator has not timely responded to BSEE requirements to correct the area of non-compliance; or the violation resulted in damage to or posed an immediate or imminent threat to life, property, or the built or natural environments.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility and/or pipeline audited.

DRILLING

PLAN APPROVAL

D-801 **HAS WRITTEN APPROVAL TO DRILL, SIDETRACK, BYPASS, OR DEEPEN A WELL BEEN RECEIVED?**

Authority: 30 CFR 250.410 **Enforcement Action: C**

INSPECTION PROCEDURE:

Verify that approval to drill, sidetrack, or deepen a well was received from the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in **(C)** INC for an audit of a drilling operation if drilling, sidetracking, bypassing, or deeping approval has not been received.

Note: The well is the component.

INSPECTION COUNT/ INC COUNT:

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

D-802 **DOES THE LESSEE HAVE WRITTEN OR ORAL APPROVAL TO CHANGE PLANS, MAKE CHANGES IN MAJOR DRILLING EQUIPMENT OR PLUG BACK A WELL?**

Authority: 30 CFR 250.465(a)(1) **Enforcement Action: C**

INSPECTION PROCEDURE:

Verify that any changes from the approved plans have been received and approved by the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in **(C)** INC for an audit of a drilling operation if the records indicate that approval has not been received for any changes from the approved plans. **Note:** The well is the component.

INSPECTION COUNT/ INC COUNT:

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

D-803 **IS THE DISTRICT SUPERVISOR GIVEN AT LEAST 24 HOURS NOTICE BEFORE STARTING A WELL TEST?**

Authority: 30 CFR 250.460(b) **Enforcement Action: W**

Note: For a well test to be conducted, it must be included in the projected plans for the test in the APD (form BSEE-123) or in the APM (form BSEE-124).

INSPECTION PROCEDURE:

Verify that the District Supervisor was notified as required.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of a drilling operation if the District Supervisor was not notified as required before the start of a well test.

INSPECTION COUNT/ INC COUNT:

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

CASING PROGRAM

D-821 **IS CASING SET AS APPROVED?**
Authority: 30 CFR 250.420 **Enforcement Action: W**
INSPECTION PROCEDURE:
Compare APD approved proposed casing setting depths to on-site records of actual casing setting depths for all strings of casing set.
IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for an audit of a well's casing setting depths if the casing was not set as approved in the APD.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

D-822 **IF THE CASING SETTING DEPTHS ARE MORE THAN 100 FEET TVD FROM THE APPROVED APD, HAS THE CHANGE BEEN APPROVED?**
Authority: 30 CFR 250.428(b) **Enforcement Action: W**
INSPECTION PROCEDURE:
Inspect records to verify that casings are set as approved by the District Supervisor.
IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for an audit of a drilling operation if the casing was set deeper without approval.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

WELL CONTROL

D-831 **ARE DRILLING OPERATIONS SUSPENDED WHEN THE SAFE MARGIN, AS APPROVED IN THE APD, BETWEEN THE DRILLING FLUID WEIGHT IN USE AND THE EQUIVALENT DRILLING FLUID WEIGHT AT THE CASING SHOE IS NOT MAINTAINED?**
Authority: 30 CFR 250.427(b) **Enforcement Action: W**
INSPECTION PROCEDURE:
Inspect the records to determine if the drilling fluid weight is within a safe margin of the equivalent drilling fluid weight. A safe margin is to be approved by the District Supervisor.
IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for an audit of a drilling operation if records indicate the safe margin has not been maintained.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

RIG MOVEMENT

D-841 **IS THE MOVEMENT OF ALL DRILLING UNITS ON AND OFF LOCATION REPORTED TO THE DISTRICT SUPERVISOR 24 HOURS PRIOR TO THE MOVEMENT, INCLUDING THE RIG NAME, LEASE NUMBER, WELL NUMBER, AND THE EXPECTED TIME OF ARRIVAL OR DEPARTURE?**

Authority: 30 CFR 250.403(a) **Enforcement Action: W**
30 CFR 250.403(b)

INSPECTION PROCEDURE:

Verify that the Operator has properly notified the District Supervisor of: 1. Arrival of the MODU on location. 2. Movement of a platform rig to a platform. 3. Movement of a platform rig to another slot. 4. Movement of a MODU to another slot. 5. Departure of a MODU from the location.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a drilling unit relocation if the proper notification of the drilling unit movement has not been submitted to the District Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per drilling unit audited.

WELL-COMPLETIONS

C-801 **HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT SUPERVISOR PRIOR TO CONDUCTING WELL-COMPLETION OPERATIONS?**

Authority: 30 CFR 250.505 **Enforcement Action: C**
30 CFR 250.513(a)

INSPECTION PROCEDURE:

Verify from office records that prior written approval was received from the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in **(C)** INC for an audit of a well-completion operation if the operator does not have written approval to conduct well-completion operations.

Note: The well is the component.

INSPECTION COUNT/ INC COUNT: Enter one item checked/ issue one INC per well audited.

WELL-WORKOVERS

W-801 **HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT SUPERVISOR PRIOR TO CONDUCTING NON-ROUTINE WELL-WORKOVER OPERATIONS?**

Authority 30 CFR 250.601 **Enforcement Action: C**
30 CFR 250.605
30 CFR 250.613(a)

INSPECTION PROCEDURE:

Verify from office records that prior written approval was received from the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in **(C)** INC for an audit of a well-workover operation if the operator does not have written approval to conduct non-routine well-workover operations.

Note: The well is the component.

INSPECTION COUNT/ INC COUNT:

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

DECOMMISSIONING

Update Last – 2011

A-801 **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 one warning **(W)** INC for an audit of well plugging operations if the cement plugs were not placed as required.

INSPECTION COUNT/ INC COUNT:

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

A-802 **WHEN MUST I PERMANENTLY PLUG ALL WELLS ON A LEASE?**

Authority: 30 CFR 250.1710 **Enforcement Code: W**

INSPECTION PROCEDURES:

Verify that all wells on a lease are permanently plugged within one year after the lease is terminated.

IF NONCOMPLIANCE EXISTS:

Issus a warning (W) INC if all well on the lease are not permanently plugged within one year after the lease is terminated.

INSPECTION COUNT/INC COUNT:

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

PRODUCTION

VENTING AND FLARING

Update Last – 2011

P-801 **HAS APPROVAL BEEN RECEIVED WHEN THE OPERATOR HAS FLARED OR VENTED OIL-WELL GAS OR GAS-WELL FLASH GAS IN EXCESS OF 48 CONTINUOUS HOURS OR 144 CUMULATIVE HOURS DURING ANY MONTH WHEN EQUIPMENT FAILS TO WORK PROPERLY, DURING EQUIPMENT MAINTENANCE AND REPAIR, OR TO RELIEVE SYSTEM PRESSURES ?**

Authority: 30 CFR 250.1160(a)(6)(i) **Enforcement Action: W/C**
30 CFR 250.1160(a)(6)(iii)
30 CFR 250.1160(a)(7)(iii)

INSPECTION PROCEDURE:

Review flaring or venting records to determine if continuous flaring or venting of oil-well gas or gas-well flash gas has exceeded 48 hours of cumulative flaring or venting of oil well gas has exceeded 144 hours during any calendar month without prior approval.

Note*** Gas well flash gas is natural gas released from condensate as a result of a decrease in pressure, an increase in temperature, or both.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for an audit of flaring or venting operations if flaring or venting has ceased but records indicate that 48 continuous hours or the 144 cumulative hours have been exceeded during a month without approval.

Issue one component shut-in (**C**) INC for one or more affected wells if flaring or venting is ongoing and records indicate that, in the current month, 48 continuous hours or the 144 cumulative hours have been exceeded without approval, upon instructions from the appropriate supervisor.

Note: The affected well is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility audited.

P-802 **HAS APPROVAL BEEN RECEIVED WHEN THE OPERATOR HAS FLARED OR VENTED PRIMARY GAS-WELL GAS IN EXCESS OF 2 CONTINUOUS HOURS WHEN EQUIPMENT FAILS TO WORK PROPERLY, DURING EQUIPMENT MAINTENANCE AND REPAIR, OR TO RELIEVE SYSTEM PRESSURES?**

Authority: 30 CFR 250 1160(a)(6)(ii) **Enforcement Action: W/C**
30 CFR 250 1160(a)(7)(ii)

INSPECTION PROCEDURE:

Review flaring or venting records to determine if continuous flaring or venting of gas-well gas has exceeded 2 hours of continuous flaring or venting without prior approval of the Regional Supervisor.

Note*** Gas well gas is natural gas from a gas well completion that is at or near its wellhead pressure; this does not include flash gas.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for an audit of flaring or venting operations if flaring or venting has ceased but records indicate that 2 continuous hours have been exceeded without approval.

Issue one component shut-in (**C**) INC for one or more affected wells if flaring or venting is ongoing and records indicate that 2 continuous hours have been exceeded without approval, upon instructions from the appropriate supervisor.

Note: The affected well is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility audited.

NEW FLARE-VENT METERS/BURNING/H_2S

Developed– 2011

P-803 **IF THE FACILITY IS REQUIRED TO HAVE FLARE/VENT METERS, DOES THE OPERATOR MAINTAIN RECORDS AND RECORDINGS DETAILING BEGINNING TIMES, END TIMES AND VOLUMES FOR ALL FLARING AND VENTING INCIDENTS, METER CALIBRATION, AND MAINTENANCE RECORDS FOR A MINIMUM OF 6 YEARS?**

Authority: 30 CFR 250 1163(d) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that operator maintain records and recording detailing beginning times, end times and volumes for all flaring and venting incidents, meter calibration records for a minimum of 6 years.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC for records if:

1. Operator has not maintained flare/vent meter records for a minimum of 6 years.
2. Flare/vent meter records do not include all information addressed above.

INSPECTION COUNT/ INC COUNT:

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

P-804 **HAS THE OPERATOR FAILED TO INSTALL A FLARE/VENT METER, WITHIN 120 DAYS, ON A FACILITY THAT PROCESSES MORE THAN AN AVERAGE OF 2000 BOPD IN A CALENDAR MONTH.**

Authority: 30 CFR 250 1163(a) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that operator has installed a meter if the facility processes more than an average of 2000 bopd in a calendar month.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the facility has no flare/vent meter(s) and it has been longer than 120-days from the month in which an average of 2000 bopd was processed.

Issue a facility shut-in (S) INC upon instructions from the rate control supervisor.

INSPECTION COUNT/ INC COUNT:

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

P-805 **HAS THE OPERATOR BURNED LIQUID HYDROCARBONS WITHOUT APPROVAL OF THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250 1162(a)

INSPECTION PROCEDURE: **Enforcement Action: W/C**

Review flaring, venting, and liquid hydrocarbon burning records to determine if the operator has burned liquid hydrocarbons without receiving approval from the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if they burned liquid hydrocarbons without approval of the Regional Supervisor.

Issue a component shut-in (**C**) INC if burning is ongoing and upon instructions from the rate control supervisor.

INSPECTION COUNT/ INC COUNT:

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

P-806 **HAS THE OPERATOR VENTED GAS CONTAINING H_2S, EXCEPT FOR MINOR RELEASES DURING MAINTENANCE AND REPAIR ACTIVITIES, THAT RESULT IN VENTING BEYOND 15 MINUTES TIME WEIGHTED AVERAGE ATMOSPHERE CONCENTRATION OF H_2S OF 20 PPM OR HIGHER?**

Authority: 30 CFR 250.1164(a) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Review venting records to determine if the operator has vented H_2S without receiving approval from the Regional Supervisor, except for minor releases during maintenance and repair activities, that result in venting beyond 15 minutes time weighted average atmosphere concentration of H_2S of 20 ppm or higher.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the operator has vented H_2S without receiving approval from the Regional Supervisor, except for minor releases during maintenance and repair activities, that result in venting beyond 15 minutes time weighted average atmosphere concentration of H_2S of 20 ppm or higher.

Issue a component shut-in (**C**) INC if ongoing.

Issue a structure shut-in **(S)** INC if ongoing and proper component to eliminate the H_2S cannot be identified.

INSPECTION COUNT/ INC COUNT:

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

SUSTAINED PRESURE CASING MANAGEMENT

Developed– 2011

P- 807 **HAS THE OPERATOR SUBMITTED THE REQUIRED PAPERWORK WHEN THE RESULTS OF THE CASING DIAGNOSTICS TEST REQUIRE NOTIFICATION OF CORRECTIVE ACTION?**

Authority: 526 **Enforcement Action: W**

INSPECTION PROCEDURE

1. Verify that a notification of corrective action paperwork was submitted to the District Manager and a copy to the Regional Supervisor, Field Operations within 14 days and included the following information:
   a. Lessee or Operator name;
   b. Area name, OCS block number;
   c. Well name and API number; and
   d. Casing diagnostic test data.
2. Review records and documentation to determine that operator submitted within 30 days of the diagnostic test an Application for Permit to Modify or Corrective Action Plan.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if records indicate that operator did not submit the correct paperwork to BSEE for any of the items listed above after conducting their casing diagnostic test.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per report audited.

P- 808 **HAS THE OPERATOR SUBMITTED A PLAN FOR CORRECTIVE ACTION TO THE RESPECTIVE DISTRICT MANAGER WITHIN 30 DAYS OF RECEIVING THE CASING PRESSURE DENIAL?**

Authority: 529 **Enforcement Action: W**

INSPECTION PROCEDURE

Review records and documentation to determine that operator

1. submitted plans for corrective action within 30 days of the casing pressure request denial.
2. notified the respective District Manager within 30 days after completion of the corrected action.
3. submitted the casing diagnostic test data to appropriate Regional Supervisor, within 14 days of completion of the diagnostics test required under 250.522(e).

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if records indicate that operator did not submit the correct paperwork to BSEE for any of the items listed above after receiving casing pressure denial.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per report audited.

PIPELINES

INSTALLATION/RELOCATION

L-801 **HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED PRIOR TO THE COMMENCEMENT OF THE INSTALLATION OR RELOCATION OF A PIPELINE?**

Authority: 30 CFR 250.1008(a) **Enforcement Action: W/C**

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to commencing the installation or relocation of a pipeline.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline audit if the lessee or the ROW holder did not notified the Regional Supervisor at lease 48 hours prior to commencing the installation or relocation of the pipeline.

Issue one component shut-in **(C)** INC for a pipeline audit if the installation or relocation of the pipeline is in progress and the lessee or the ROW holder has not notified the Regional Supervisor prior to the commencement of the operation.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-802 **WAS THE PIPELINE CONSTRUCTED IN A MANNER TO MINIMIZE DEVIATION FROM THE ROW GRANTED?**

Authority: 30 CFR 250.1012(b)(1) **Enforcement Action: W/C 30 CFR 250.1012(b)(3)**

Note: The Regional Supervisor will make the determination of whether a deviation is substantial.

INSPECTION PROCEDURE:

Review records in TIMS GIS and compare the as-built information submitted with the approved ROW associated pipeline segment route.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a deviation audit if the as-built information submitted indicates that the pipeline was constructed with a deviation from the ROW granted, but the deviation is determined to be not substantial.

Issue one component shut-in **(C)** INC for a deviation audit if the as-built information submitted indicates that the pipeline was constructed with a deviation from the ROW granted and the deviation is determined to be substantial.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-803 **HAS THE LESSEE OR THE ROW HOLDER SUBMITTED A COMPLETION REPORT TO THE REGIONAL SUPERVISOR AFTER COMPLETION OF ANY PIPELINE CONSTRUCTION?**

Authority: 30 CFR 250.1008(b) **Enforcement Action: W/C**

INSPECTION PROCEDURE:

Verify that the lessee has submitted a report that conforms to the requirements of 30 CFR 250.1008(b) to the Regional Supervisor after completion of any pipeline construction.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline audit if the lessee or ROW holder did not submit a report to the Regional Supervisor within 90 calendar days after completion of a pipeline construction.

Issue one component shut-in **(C)** INC for a pipeline audit if the report does not conform to the requirements of 30 CFR 250.1008(b).

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-804 **IS THE PIPELINE PROPERLY MAINTAINED AND USED FOR THE PURPOSE FOR WHICH THE ROW WAS GRANTED?**

Authority: 30 CFR 250.1009(e) **Enforcement Action: W/C**

Note: Temporary cessation or suspension of pipeline operations shall not cause the ROW grant to expire.

INSPECTION PROCEDURE:

Review office file records, TIMS data, and any pertinent information received to determine if the pipeline is: 1. In operation;

2. Properly maintained; and

3. Used for the purpose for which the ROW was granted.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline audit if the pipeline is not used for the purpose for which the ROW was granted.

Issue one component shut-in **(C)** INC for a pipeline audit if the pipeline is not adequately maintained and poses an immediate danger to personnel, the environment, or a facility.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

TESTING

L-811 **HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED PRIOR TO A PRESSURE TEST ON A PIPELINE?**

Authority: 30 CFR 250.1008(a) **Enforcement Action: W/C**

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to conducting a pressure test on a pipeline.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline audit if the lessee or the ROW holder did not notified the Regional Supervisor at lease 48 hours prior to conducting a pressure test on a pipeline.

Issue one component shut-in **(C)** INC for a pipeline audit if a pressure test on the pipeline is currently being conducted and the lessee or the ROW holder has not notified the Regional Supervisor prior to commencing the operation.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-812 **HAVE THE RESULTS AND CONCLUSIONS OF MEASUREMENTS OF PIPE-TO-ELECTROLYTE POTENTIAL MEASUREMENTS TAKEN ANNUALLY ON EACH DOI PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.1000(e)(1) **Enforcement Action: C**
30 CFR 250.1005(b)
30 CFR 250.1008(h)

INSPECTION PROCEDURE:

Verify that the results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually on each DOI pipeline were submitted to the Regional Supervisor before March of each year.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in **(C)** INC for a pipeline audit if:

1. Results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually are not reported to the Regional Supervisor before March of each year.
2. Measurements of pipe-to-electrolyte potential measurements are not taken annually on a DOI pipeline.
3. Measurements of pipe-to-electrolyte potential measurements taken annually on a DOI pipeline are not analyzed.
4. After a review of the report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-813 **HAVE PIPELINES THAT WERE INSTALLED, RELOCATED, UPRATED, OR REACTIVATED AFTER BEING OUT OF SERVICE FOR MORE THAN 1 YEAR, BEEN HYDROSTATICALLY TESTED WITH WATER TO A STABILIZED PRESSURE OF AT LEAST 1.25 TIMES THE MAOP FOR AT LEAST 8 HOURS?**

Authority: 30 CFR 250.1003(b)(1) **Enforcement Action: W/C**
30 CFR 250.1003(b)(3)

INSPECTION PROCEDURE:

1. Review the construction report to determine if a hydrostatic pressure test was performed on the pipeline for 8 hours and if the appropriate instruments (i.e., dead weight gauge, temperature recorder, and pressure recorder) were utilized.
2. Check dead weight test readings, temperature chart, and pressure chart.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline construction report audit if:

1. Any of the appropriate instruments were not utilized.
2. Collected data is not available.

Issue one component shut-in **(C)** INC for a pipeline construction audit if the pipeline was not tested for the required pressure and time period.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

OUT-OF-SERVICE REPORTING

L-821 **HAS THE LESSEE OR THE ROW HOLDER REPORTED A PIPELINE TAKEN OUT OF SERVICE TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.1008(c) **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Verify that the lessee or the ROW holder has reported any pipeline taken out of service to the Regional Supervisor.
2. Verify that written confirmation is provided if the period of time the pipeline is out of service is greater than 60 days.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline audit if written confirmation is not provided when the period of time that the pipeline is out of service is greater than 60 days.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-822 **HAS THE LESSEE OR THE ROW HOLDER REPORTED ANY PIPELINE SAFETY EQUIPMENT TAKEN OUT OF SERVICE FOR MORE THAN 12 HOURS TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.1000(e)(1) **Enforcement Action: W/C**
30 CFR 250.1008(d)

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has reported any pipeline safety equipment taken out of service for more than 12 hours to the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC if any pipeline safety equipment was taken out of service for a period of more than 12 hours and not reported to the Regional Supervisor.

Issue one component shut-in **(C)** INC for a pipeline audit if the Regional Supervisor cannot determine that continued activity without pipeline safety equipment would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish and other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-823 **HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED WHEN THE PIPELINE SAFETY EQUIPMENT IS RETURNED TO SERVICE?**

Authority: 30 CFR 250.1008(d) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has reported to the Regional Supervisor when pipeline safety equipment is returned to service.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for failure to notify the Regional Supervisor when pipeline safety equipment is returned to service.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

REPAIR

L-831 **HAS THE LESSEE OR THE ROW HOLDER NOTIFIED THE REGIONAL SUPERVISOR PRIOR TO THE REPAIR OF A PIPELINE OR AS SOON AS PRACTICABLE THEREAFTER?**

Authority: 30 CFR 250.1008(e) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to the repair of a pipeline or as soon as practicable thereafter.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline repair if the Regional Supervisor was not notified prior to the repair of a pipeline or as soon as practicable thereafter.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-832 **HAS A DETAILED REPORT ON THE REPAIR OF A PIPELINE OR PIPELINE COMPONENT BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.1000(e)(1) **Enforcement Action: W/C**
30 CFR 250.1008(e)

INSPECTION PROCEDURE:

1. Verify that a detailed report on the repair of a pipeline or pipeline component was submitted to the Regional Supervisor within 30 days after completion of the repairs. 2.

Verify that the detailed report includes the required information.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline or pipeline component repair if a detailed report on the repair does not include:

1. Description of the repairs;
2. Results of pressure test; and
3. Date the pipeline or pipeline component was returned to service.

Issue one component shut-in **(C)** INC for a pipeline or pipeline component repair if:

1. A detailed report on the repair was not submitted to the Regional Supervisor within 30 days after completion of the repairs.
2. After a review of the report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-833 **HAS THE LESSEE SUBMITTED TO THE REGIONAL SUPERVISOR A COMPREHENSIVE WRITTEN REPORT OF ANY PIPELINE FAILURE ANALYZED?**

Authority: 30 CFR 250.1008(f) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that a comprehensive written report of the analysis of any pipeline failure was submitted by the lessee to the Regional Supervisor when requested.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline failure audit if a comprehensive written report of the analysis of the pipeline failure was not submitted to the Regional Supervisor within the time frame specified.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-834 **HAS A PLAN OF CORRECTIVE ACTION FOR OBSERVED DETRIMENTAL ENVIRONMENTAL FACTORS AFFECTING A PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR APPROVAL?**

Authority: 30 CFR 250.1000(e)(1) **Enforcement Action: W/C 30 CFR 250.1008(g)**

INSPECTION PROCEDURE:

Verify that a plan of corrective action of observed detrimental environmental factors affecting a pipeline was submitted to the Regional Supervisor for approval within 30 days of the observation.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a corrective plan audit if a plan of corrective action for observed detrimental environmental factors affecting a pipeline was not submitted to the Regional Supervisor for approval within 30 calendar days of the observation.

Issue one component shut-in **(C)** INC for a corrective plan audit if:

1. A plan of corrective action was not prepared for known detrimental environmental factors that would affect a pipeline.
2. After a review of the report, the Regional Supervisor cannot determine that proposed corrective action would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

L-835 **HAS A REPORT OF REMEDIAL ACTION TAKEN FOR DETRIMENTAL ENVIRONMENTAL FACTORS AFFECTING A PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR BY THE LESSEE OR ROW HOLDER?**

Authority: 30 CFR 250.1000(e)(1) **Enforcement Action: W/C 30 30 CFR 250.1008(g)**

INSPECTION PROCEDURE:

Verify that a report of remedial action taken for detrimental environmental factors affecting a pipeline has been submitted to the Regional Supervisor within 30 days after completion of the remedial action.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a remedial action report audit if the report of remedial action taken for detrimental environmental factors affecting a pipeline was not submitted by the lessee or ROW holder to the Regional Supervisor within 30 calendar days after completion of the remedial action.

Issue one component shut-in **(C)** INC for a remedial action report audit if, after a review of the remedial action taken report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

DECOMMISSIONING

L-841 **ARE PIPELINES OUT OF SERVICE FOR 5 YEARS, OR MORE, REMOVED IF THE PIPELINES ARE DETERMINED BY THE REGIONAL SUPERVISOR TO BE OBSTRUCTIONS?**

Authority: 30 CFR 250.1006(b)(3) **Enforcement Action: W**
30 CFR 250.1752
30 CFR 250.1754

INSPECTION PROCEDURE:

1. Verify that pipelines out of service for 5 years, or more, and that the Regional Supervisor determines constitute obstructions, are removed.
2. Verify that out-of-service pipelines that are removed are:
   A. Pigged, unless the Regional Supervisor determines that pigging is not practical. B. Flushed.
   C. Removed in accordance with the removal procedures and schedule approved by the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a pipeline audit if the out-of-service pipelines are not removed as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

COMPANY INFORMATION

L-851 **HAS THE ROW HOLDER KEPT THE REGIONAL SUPERVISOR INFORMED OF THE COMPANY'S OFFICE ADDRESS, AND THE NAME AND ADDRESS OF OFFICER OR AGENT AUTHORIZED TO BE SERVED WITH PROCESS?**

Authority: 30 CFR 250.1010(d) **Enforcement Action: W**

INSPECTION PROCEDURE:

Review BSEE office file records to determine if the company information and the information for the officer or agent authorized to be served with process is current and correct.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for each company file audit if the information is not correct or current.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per pipeline audited.

CONSERVATION OF RESOURCES
INTERESTS
Updated - 2011

R-801 **HAS THE OPERATOR RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR TO COMMENCE PRODUCTION FROM A RESERVOIR WITHIN A WELL THAT HAS ANY PORTION OF THE COMPLETED INTERVAL LESS THAN 500 FEET FROM A UNIT OR LEASE LINE?**

Authority: 30 CFR 250.1156(a) **Enforcement Action: W/C**

INSPECTION PROCEDURE:

Review the official documentation and other records to determine if the producing interval of the well is within 500 feet from a unit or lease line. If so, determine whether approval was received before production began.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a well that the operator is producing, without approval, from the well in which the completed interval is closer than 500 feet from a lease or unit line.

Issue one component shut-in (**C**) INC for a well the operator is producing a potentially competitive reservoir or potentially draining a common reservoir from a low royalty rate lease without approval, from the well in which the completed interval is closer than 500 feet from a lease or unit line.

Note: The well is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well completion audited.

R-802 **HAS THE OPERATOR RECEIVED DOWNHOLE COMMINGLING APPROVAL FROM THE REGIONAL SUPERVISOR BEFORE PERFORATING MULTIPLE RESERVOIRS WITHIN A COMMON WELLBORE?**

Authority: 30 CFR 250.1158(a) **Enforcement Action: W/C**
30 CFR 250.1158(b)

INSPECTION PROCEDURE:

Review the official documentation and other records to determine if two or more separate reservoirs have been downhole commingled without prior approval and if any of the commingled reservoirs are competitive.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a well audit if the audit shows that the operator completed a well in which the completed interval clearly encompasses multiple reservoirs that are downhole commingled without prior approval.

Issue one component shut-in (**C**) INC for a well audit if the operator completed a well in which the completed interval clearly encompasses multiple reservoirs that are downhole commingled without prior approval and one or more of the commingled reservoirs are competitive.

Note: The well is the component.

INSPECTION COUNT/ INC COUNT:

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

R-803 **HAS THE OPERATOR OBTAINED AN APPROVED CONSERVATION INFORMATION DOCUMENT (CID) PRIOR TO COMMENCING PRODUCTION OF A DEEPWATER DEVELOPMENT LOCATED IN WATER DEPTHS GREATER THAN 400 METERS (1312 FEET)?**

Authority: 296(a) **Enforcement Action: W 299**

INSPECTION PROCEDURE:

Review well and reservoir records to determine whether production has commenced without an approved CID for projects in which any part of the development is located in greater than 400 meters (1312 feet) of water.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if lessee did not receive an Approved Conservation Information Document from BSEE Regional Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per CID audited.

R-804 **HAS THE OPERATOR SUBMITTED A REVISION TO THEIR APPROVED CONSERVATION INFORMATION DOCUMENT (CID) AND RECEIVED APPROVAL OF THIS REVISION BEFORE BYPASSING A RESERVOIR REQUIRED BY DEVELOPMENT IN THE ORIGINAL CID?**

Authority: 296(b) **Enforcement Action: W**

INSPECTION PROCEDURE:

Review well and reservoir records and approved wellbore utility charts to determine whether a reservoir required for development by an approved CID has been bypassed without prior approval of a revision to the operators' CID.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if lessee did not receive an approval for revisions done to the existing Conservation Information Document from BSEE Regional Supervisor before bypassing a reservoir.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per CID audited.

ENHANCED RECOVERY

Updated– 2011

R-811 **HAS THE LESSEE RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR PRIOR TO INITIATING AN ENHANCED OIL AND GAS RECOVERY PROJECT OR OTHER TYPE OF INJECTION PROJECT?**

Authority: 30 CFR 250.1165(b) **Enforcement Action: W**
30 CFR 250.118

INSPECTION PROCEDURE:

Review record to determine if the enhanced oil and gas recovery operation or other type of injection project was approved by the Regional Supervisor prior to their initiation.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a injection audit if the enhanced oil and gas operations were initiated prior to receiving approval of the Regional Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lessee audited.

R-812 **HAS THE LESSEE INITIATED ENHANCED OIL AND GAS RECOVERY OPERATIONS FOR ALL RESERVOIRS WHERE THESE OPERATIONS WOULD RESULT IN AN INCREASE IN ULTIMATE RECOVERY UNDER SOUND ENGINEERING AND ECONOMIC PRINCIPLES?**

Authority: 30 CFR 250.1165(a) **Enforcement Action: W**
30 CFR 250.118

INSPECTION PROCEDURE:

Review records in TIMS and other documentation to determine if enhanced oil and gas recovery operations were initiated in a timely manner where such operations would result in an increased ultimate recovery of oil and gas.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a production/injection audit if the audit shows that enhanced oil and gas operations
were not:

1. Initiated in a timely manner.
2. Based upon sound engineering and economic principles.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per reservoir audited.

R-813 **ARE REPORTS OF THE VOLUMES OF OIL, GAS, AND OTHER SUBSTANCES INJECTED INTO, PRODUCED FROM, OR REPRODUCED FROM A RESERVOIR SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?**

Authority: 30 CFR 250.1165(c) **Enforcement Action: W**
30 CFR 250.118

INSPECTION PROCEDURE:
Review records to determine if reports of the volumes of oil, gas, and other substances injected into, produced from, or reproduced from a reservoir are submitted to the Regional Supervisor when requested.

IF NONCOMPLIANCE EXISTS:
Issue one warning (**W**) INC for a records audit if the required reports were not submitted to the Regional Supervisor when requested.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per reservoir audited.

PRODUCTION RATE

Updated– 2011

R-821 **HAS THE LESSEE CONDUCTED A WELL-FLOW POTENTIAL TEST WITHIN 30 DAYS AFTER THE DATE OF FIRST CONTINUOUS PRODUCTION ON A NEW, RECOMPLETED, OR REWORKED WELL COMPLETION?**

Authority: 30 CFR 250.1151(a)(1) **Enforcement Action: W**

INSPECTION PROCEDURE:
Review records to determine if a well-flow potential test was completed within 30 days after the date of the first continuous production on a new, recompleted, or reworked well completion.

IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for the well test audit if the well-flow potential test was not completed within the required time frame.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

R-822 **HAS THE LESSEE SUBMITTED, FOR APPROVAL BY THE REGIONAL SUPERVISOR, A PROPOSED MPR WITH THE WELL-FLOW POTENTIAL TEST DATA, ON FORM BSEE-126, WELL POTENTIAL TEST REPORT, WITHIN 15 CALENDAR DAYS AFTER THE END OF THE TEST PERIOD?**

Authority: 30 CFR 250.1151(a)(1) **Enforcement Action: W**
30 CFR 250.1167

INSPECTION PROCEDURE:
Review records to determine if a proposed MPR with the associated well-flow potential test data for each individual well completion was submitted for approval to the Regional Supervisor, within 15 days after the end of the well test period.

IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for a production audit if the proposed MPR with the associated well test data, on a Form BSEE-126, has not been submitted for approval to the Regional Supervisor within the required time frame.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

R-823 **ARE THE WELLS AND RESERVOIRS BEING PRODUCED AT RATES THAT WILL DEPLETE THE HYDROCARBON RESOURCES IN A MANNER THAT MAXIMIZES ULTIMATE RECOVERY WITHOUT ADVERSELY AFFECTING CORRELATIVE RIGHTS?**
Authority: 30 CFR 250.1150 **Enforcement Action: W**

INSPECTION PROCEDURE:
Review well and reservoir records to determine if hydrocarbon resources are produced in a manner that will maximize their ultimate recovery without adversely affecting correlative rights.
IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for a production audit if the records show that:
1. Ultimately recovery of hydrocarbon resources will be significantly adversely impacted by current production operations.
2. Correlative rights are adversely affected.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per reservoir and/or well audited.

WELL TESTS

Updated– 2011

R-831 **HAS THE LESSEE CONDUCTED AT LEAST ONE WELL TEST FOR PRODUCING OIL-WELL OR GAS-WELL COMPLETIONS, DURING A HALF-CALENDAR YEAR?**
Authority: 30 CFR 250.1151(a)(2) **Enforcement Action: W**

INSPECTION PROCEDURE:
Review records to determine if the lessee has conducted at least one well test for producing oil-well or gaswell completions during a half-calendar year.
IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for a production audit if at least one well test was not conducted for the completion during the current half-calendar year.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

R-832 **HAS THE LESSEE SUBMITTED WELL TEST RESULTS FOR EACH PRODUCING OIL-WELL AND GAS-WELL COMPLETION TO THE REGIONAL SUPERVISOR ON FORM BSEE-128, SEMIANNUAL WELL TEST REPORT, WITHIN 45 DAYS AFTER THE TEST WAS CONDUCTED?**
Authority: 30 CFR 250.1151(a)(2) **Enforcement Action: W**

INSPECTION PROCEDURE:
Review records to determine if the lessee well test data was submitted well test results for each producing oil well and gas-well completion to the Regional Supervisor within 45 calendar days after the test was conducted.
IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for a production audit if well test results for a producing oil-well or gas-well completion has not been submitted to the Regional Supervisor within the required time frame.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

R-833 **HAS THE OPERATOR SUBMITTED A REQUEST FOR A SUSPENSION BEFORE THE END OF THE LEASE TERM, END OF THE 180-DAY PERIOD FOLLOWING THE LAST LEASE HOLDING ACTIVITY, OR END OF A CURRENT SUSPENSION?**

Authority: 30 CFR 250.171 **Enforcement Action: W**

INSPECTION PROCEDURE:

Review the request, official documentation and other records to determine if the request was received before the end of the lease term, end of the 180-day period following the last lease holding activity, or end of a current suspension.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a suspension request if the request was not received before the end of the lease term, end of the 180-day period following the last lease holding activity, or end of a current suspension.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease audited.

CONSERVATION OF RESOURCES
(CIDs and Gas Cap Production)

Update Last –2011

R-840 **HAS THE OPERATOR SUMITTED FORM BSEE-127, SENSITIVE RESERVOIR INFORMATION REPORT (SRI), WITHIN 45 DAYS AFTER BEGINNING PRODUCTION FROM THE RESERVOIR OR DISCOVERING THAT IT IS SENSITIVE?**

Authority: 30 CFR 250.1155(a) **Enforcement Action: W**

INSPECTION PROCEDURE:

Review well, reservoir, and production records to determine if reservoir is sensitive.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if operator did not submit required initial Form BSEE-127, SRI for a sensitive reservoir.

INSPECTION COUNT / INC COUNT:

Enter one item checked/ issue one INC per reservoir audited.

R-841 **HAS THE OPERATOR SUBMITTED FORM BSEE-127, SENSITIVE RESERVOIR INFORMATION REPORT (SRI), AT LEAST ONCE DURING THE CALENDAR YEAR?**

Authority: 30 CFR 250.1155(b) **Enforcement Action: W**

INSPECTION PROCEDURE:

Review records to ascertain that Form BSEE-127, SRI has been submitted as least once during the calendar year, effective from date of initial Form BSEE-127, SRI submittal.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if operator did not submit required annual Form BSEE-127, SRI for each sensitive reservoir.

INSPECTION COUNT / INC COUNT:

Enter one item checked/ issue one INC per reservoir audited.

R-842 **HAS THE OPERATOR REQUESTED AND RECEIVED APPROVAL BEFORE PRODUCING GAS-CAP GAS FROM EACH COMPLETION IN AN OIL RESERVOIR THAT IS KNOWN TO HAVE AN ASSOCIATED GAS CAP?**

Authority: 30 CFR 250.1157(a)1 **Enforcement Action: W/C**
30 CFR 250.1158(a)2

INSPECTION PROCEDURE:

Review well, reservoir, and production records to determine if well is producing gas-cap gas.

Note: Requests to produce the gas cap of a sensitive reservoir are done on a well, not reservoir basis.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC if operator did not submit and receive prior approval to produce the gas cap of a sensitive reservoir.

Issue one component **(C)** shut-in INC if operator did not submit and receive prior approval to produce the gas cap of a sensitive reservoir and continued production poses a threat to ultimate recovery.

INSPECTION COUNT / INC COUNT

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

R-843 **HAS THE OPERATOR OBTAINED AN APPROVED CONSERVATION INFORMATION DOCUMENT (CID) PRIOR TO COMMENCING PRODUCTION OF A DEEPWATER DEVELOPMENT LOCATED IN WATER DEPTHS GREATER THAN 400 METERS (1312 FEET)?**

Authority: 30 CFR 250.299 **Enforcement Action: W**
30 CFR 250.204(c)

INSPECTION PROCEDURE:

Review well, reservoir, and production records to determine whether production has commenced without an approved CID for projects in which any part of the development is located in water depths greater than 400 meters (1312 feet).

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if operator did not receive an approved CID from the Regional Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per CID audited.

R-844 **HAS THE OPERATOR SUBMITTED A REVISION TO THEIR APPROVED CONSERVATION INFORMATION DOCUMENT (CID) AND RECEIVED APPROVAL OF THIS REVISION BEFORE BYPASSING A RESERVOIR REQUIRED TO BE DEVELOPED IN THE ORIGINAL CID?**

Authority: 30 CFR 250.296(b) **Enforcement Action: W**

INSPECTION PROCEDURE:

Review well and reservoir records and approved wellbore utility charts to determine whether a reservoir required for development by an approved CID has been bypassed without prior approval of a revision to the operators' CID.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if operator did not receive an approval for revisions done to the existing CID from the Regional Supervisor before bypassing a reservoir.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per CID audited.

R-845 **DID THE OPERATOR SUBMIT A CONSERVATION INFORMATION DOCUMENT (CID) AT THE SAME TIME AS THEY FIRST SUBMITTED THEIR DEVELOPMENT OPERATIONS COORDINATION DOUCMENT (DOCD) OR DEVELOPMENT PRODUCTION PLAN (DPP) FOR ANY DEVELOPMENT OF A LEASE OR LEASES LOCATED IN WATER DEPTHS GREATER THAN 400 METERS (1,312 FEET)?**

Authority: 30 CFR 250.296(a) **Enforcement Action: W**

INSPECTION PROCEDURE:

Review of internal databases for determination of DOCD or DPP submission.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if operator did not submit a CID at the same time as a DOCD or DPP for any development of a lease or leases located in water depths greater than 400 meters (1312 feet).

INSPECITION COUNT/INC COUNT:

Enter one item checked/ issue one INC per CID audited.

BOTTOMHOLE PRESSURE SURVEYS

Update Last –2011

R-850 **DID THE OPERATOR CONDUCT A STATIC BOTTOMHOLE PRESSURE SURVEY WITHIN 90 DAYS AFTER THE DATE OF FIRST CONTINUOUS PRODUCTION FOR A NEW PRODUCING RESEROIR AND SUBMIT THE RESULTS OF ALL STATIC BOTTOMHOLE PRESSURE SURVEYS ON FORM BSEE-140, BOTTOMHOLE PRESSURE SURVEY (BHP) REPORT, WITHIN 60 DAYS AFTER THE DATE OF THE SURVEY?**

Authority: 30 CFR 250.1153(a)(1) **Enforcement Action: W**
30 CFR 250.1153(c)

INSPECTION PROCEDURE:
Review internal databases to ascertain whether or not static bottomhole pressure surveys were run.

IF NONCOMPLIANCE EXISTS:
Issue a **(W)** INC if the operator did not submit Form BSEE-140, bottomhole pressure survey report within 60 days after the date of the survey.

INSPECTION COUNT/INC COUNT:
Enter one item checked/ issue one INC for each report.

R-851 **DID THE OPERATOR CONDUCT AN ANNUAL STATIC BOTTOMHOLE PRESSURE SURVEY IN A SUFFICIENT NUMBER OF KEY WELLS TO ESTABLISH AN AVERAGE RESERVOIR PRESSURE AND SUBMIT THE RESULTS ON FORM BSEE-140, BOTTOMHOLE PRESSURE SURVEY (BHP) REPORT?**

Authority: 30 CFR 250.1153(a)(2) **Enforcement Action: W**
30 CFR 250.1153(c)

INSPECTION PROCEDURE:
Review internal databases to ascertain whether or not static bottomhole pressure surveys were submitted on an annual basis.

IF NONCOMLIANCE EXISTS:
Issue a warning **(W)** INC if operator does not submit annual Form BSEE-140, Bottomhole Pressure Survey Reports.

INSPECTION COUNT/INC COUNT:
Enter one item checked/issue on INC for each report.

PRODUCTION MEASUREMENT AND SITE SECURITY

CALIBRATION

M-801 **IS EACH MECHANICAL DISPLACEMENT PROVER AND TANK PROVER CALIBRATED AT LEAST ONCE EVERY 5 YEARS AND A COPY OF THE CALIBRATION REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.1202(f) **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Verify that each mechanical displacement prover and tank prover has been calibrated in accordance with API MPMS at least once every 5 years.
2. Verify that each calibration report has been submitted to the Regional Supervisor within 15 days after the calibration.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for the calibration verification of one or more provers if:

1. The calibration did not occur at least once every 5 years.
2. The calibration report was not submitted to the Regional Supervisor within 15 days after the calibration.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility audited.

M-802 **IS EACH OPERATING ROYALTY METER PROVED MONTHLY TO DETERMINE THE METER FACTOR AND IS THE PROVING REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.1202(d)(3) **Enforcement Action: W/C**
30 CFR 250.1202(d)(4)
30 CFR 250.1202(d)(5)

INSPECTION PROCEDURE:

1. Verify that each royalty meter is proved to determine the meter factor monthly, but not to exceed 42 days, unless another proving schedule has been approved by the Regional Supervisor.
2. Verify that a copy of each royalty meter proving report is submitted to the Regional Supervisor within 15 days after the end of the month.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a proving audit of one or more royalty meters if the current provings have exceeded the approved proving schedule.

Issue one component shut-in **(C)** INC for a proving audit of a royalty meter if the current proving report was not submitted to the Regional Supervisor within 15 days after the end of the month.

Note: The royalty meter is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per meter audited.

M-803 **IS THE RUN TICKET FOR EACH ROYALTY METER AND ROYALTY TANK COMPLETE, WAS IT PULLED WHEN REQUIRED, AND WAS IT SUBMITTED TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.1202(c) **Enforcement Action: W/C**

INSPECTION PROCEDURE:

1. Review the royalty meter or royalty tank run tickets to verify that they clearly identify all observed data, all correction factors, on/off seal numbers (royalty tanks only), and the net standard volume.
2. Verify that a run ticket was pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.
3. Verify that a copy of each run ticket is submitted to the Regional Supervisor within 15 days after the end of the month.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a run ticket audit of one or more royalty meter and royalty tank if:

1. The current run ticket does not clearly identify all observed data, all correction factors, on/off seal numbers (royalty tank only), and the net standard volume.
2. The current run ticket was not pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.

Issue one component shut-in **(C)** INC for a run ticket audit of a royalty meter or royalty tank if the current run ticket was not submitted to the Regional Supervisor within 15 days after the end of the month.

Note: The royalty meter or the royalty tank is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per meter or tank audited.

LIQUID ROYALTY METER

M-821 **ARE LIQUID HYDROCARBON ROYALTY METERS TAKEN OUT OF SERVICE, REPAIRED OR REPLACED, AND REPROVEN IF THE DIFFERENCE BETWEEN THE METER FACTOR AND THE PREVIOUS METER FACTOR EXCEEDS 0.0025?**

Authority: 30 CFR 250.1202(i)(1) **Enforcement Action: W**

INSPECTION PROCEDURE:

1. If a malfunction occurs:
   A. Ensure that the meter remains out of service until the malfunction is corrected.
   B. Ensure that the average of the malfunction factor and the previous factor is applied to the production measured through the meter between the date of the previous factor and the date of the malfunction factor.
   C. Ensure that proving reports indicate that a malfunction occurred and show all appropriate remarks regarding subsequent repairs or adjustments.

Note: If A through C above is accomplished, an INC is not warranted. 2.

Check proving reports for previous meter malfunctions.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a proving report audit if the proving report indicates that:

1. A previous meter malfunction occurred, the meter was taken out of service, repaired or replaced, and reproved; but information as to production averaging and meter repair or replacement is not available.
2. If proving reports indicate that a previous meter malfunction occurred and the meter was not taken out of service, repaired or replaced, and reproved.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per meter audited.

GAS ROYALTY METER

M-831 **ARE GAS VOLUME AND QUALITY STATEMENT DISPOSITIONS ON GAS ROYALTY METERS SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?**

Authority: 30 CFR 250.1203(b)(6) **Enforcement Action: W/C**
30 CFR 250.1203(b)(7)
30 CFR 250.1203(b)(8)
30 CFR 250.1203(b)(9)

INSPECTION PROCEDURE:

1. Verify that the gas volume and quality statements and additional information were submitted when requested.
2. Verify that the gas volume and quality statements clearly identify all required data.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a gas volume audit of one or more gas royalty meters if the gas volume and quality statements and additional information do not clearly identify all required data.

Issue one component shut-in **(C)** INC for a gas volume audit of a gas royalty meter if the requested gas volume and quality statements and additional information requested by the Regional Supervisor are not submitted within the time frame specified.

Note: The gas royalty meter is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per meter audited.

GEOLOGICAL AND GEOPHYSICAL EXPLORATION
PERMITS

Update Last –2011

O-801 **IS REQUIRED PERMIT APPROVED OR NOTICE OF SCIENTIFIC RESEARCH FILED PRIOR TO CONDUCTING A GEOLOGICAL OR GEOPHYSICAL ACTIVITY?**

Authority: 30 CFR 251.1 **Enforcement Action: S**
30 CFR 251.3
30 CFR 251.4
30 CFR 251.5
30 CFR 251.10

INSPECTION PROCEDURE:
Verify that permit has been issued or a notice filed with BSEE prior to commencing a G&G activity.

IF NONCOMPLIANCE EXISTS:
Issue one facility shut-in **(S)** INC for a G&G activity audit if the activity is conducted without a permit or notice.

Note: The G&G activity is the facility.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per G&G activity audited.

O-802 **ARE GEOLOGICAL AND GEOPHYSICAL ACTIVITIES BEING CONDUCTED IN ACCORDANCE WITH REGULATIONS AND AN APPROVED PERMIT?**

Authority: 30 CFR 251.1 **Enforcement Action: W/S**
30 CFR 251.3
30 CFR 251.4
30 CFR 251.6
30 CFR 251.7
30 CFR 251.8
30 CFR 251.9
30 CFR 251.10

INSPECTION PROCEDURE:
Verify that G&G activities are being conducted in accordance with regulations and the approved permit.

IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for a G&G activity audit if the G&G activity was conducted in violation of regulations and an approved permit.
Issue one facility shut-in **(S)** INC for a G&G activity audit if the G&G activity currently being performed is being conducted in violation of regulation and an approved permit.

Note: The G&G activity is the facility.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per G&G activity audited.

O-803 **IS REQUIRED PERMIT APPROVED OR NOTICE OF SCENTIFIC RESEARCH FILED PRIOR TO PROSPECTING FOR MINERALS OTHER THAN OIL, GAS, AND SULPHUR ON THE OUTER CONTINENTAL SHELF?**

AUTHORITY: 30 CFR 280 **ENFORCEMENT ACTION: S**
30 CFR 280.10
30 CFR 280.11
30 CFR 280.12
30 CFR 280.13

INSPECTION PROCEDURE:
Verify that permit has been issued or a notice filed with BSEE prior to commencing prospecting for minerals other than oil, gas, and sulphur on the Outer Continental Shelf.

IF NONCOMPLIANCE EXISTS
Issue one facility shut-in **(S)** INC for prospecting activity audit if the activity is conducted without a permit or notice.

Note: The prospecting activity is the facility.

INSPECTION COUNT/INC COUNT:
Enter one item checked/issue one INC per prospecting activity audited.

O-804 **ARE PROSPECTING ACTIVITIES FOR MINERALS OTHER THAN OIL, GAS, AND SULPHUR ON THE OUTER CONTINENTAL SHELF BEING CONDUCTED IN ACCORDANCE WITH REGULATIONS AND AN APPROVED PERMIT?**

AUTHORITY: 30 CFR 280 **ENFORCEMENT ACTION: W/S**
30 CFR 280.20
30 CFR 280.21
30 CFR 280.22
30 CFR 280.23
30 CFR 280.24
30 CFR 280.25
30 CFR 280.26
30 CFR 280.27
30 CFR 280.28
30 CFR 280.29
30 CFR 280.30
30 CFR 280.31
30 CFR 280.32
30 CFR 280.33
30 CFR 280.34

INSPECTION PROCEDURE:
Verify that Prospecting activities are being conducted in accordance with regulations and the approved permit.

IF NONCOMPLIANCE EXISTS:
Issue one warning (**W**) INC for a prospecting activity audit if the prospecting activity was conducted in violation of
regulations and an approved permit.
Issue one facility shut-in (**S**) INC for a prospecting activity audit if the prospecting activity currently being performed is
being conducted in violation of regulation and an approved permit.

Note: The prospecting activity is the facility.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per prospecting activity audited.

DATA

Developed – 2011

O-811 **ARE REQUIRED GEOLOGICAL AND GEOPHYSICAL DATA AND INFORMATION SUBMITTED TO BSEE WITHIN THE TIME FRAME SPECIFIED BY REGULATION AND PERMIT?**

Authority: 30CFR 251.1 **Enforcement Action: W**
30CFR251.10
30CFR 251.11
30CFR 251.12

INSPECTION PROCEDURE:
Verify that required data and information are submitted in the timeframe required by regulations and a G&G permit.

IF NONCOMPLIANCE EXISTS:
Issue one warning **(W)** INC for a G&G activity audit if the G&G data and information has not been submitted as specified by regulation and permit.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per G&G activity audited.

O-812 **ARE REQUIRED GEOLOGICAL AND GEOPHYSICAL DATA AND INFORMATION SUBMITTED TO BSEE WITHIN THE TIME FRAME SPECIFIED BY REGULATION AND PERMIT?**

Authority: 30 CFR 280 **Enforcement Action: W**
30 CFR 280.40
30 CFR 280.41
30 CFR 280.42
30 CFR 280.34
30 CFR 280.50
30 CFR 280.51
30 CFR 280.52

INSPECTION PROCEDURE:
Verify that required data and information are submitted in the timeframe required by regulations and a G&G permit.

IF NONCOMPLIANCE EXISTS:
Issue one warning (**W**) INC for a G&G activity audit if the G&G data and information has not been submitted as specified by regulation and permit.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per G&G activity audited

RENEWABLE ENERGY

GENERAL PROVISIONS

Developed 2008

T-800 **ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS?**

Authority: 30 CFR 585.100 **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the lease stipulation.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the violation of the stipulation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment and it can be shut-in without affecting the overall safety of the facility.

Issue a facility shut-in **(S)** INC when the violation of the stipulation poses an immediate danger to the entire facility, personnel, or the environment and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

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

T-801 **DOES THE OPERATOR ENSURE ACTIVITIES AUTHORIZED IN THIS PART ARE CARRIED OUT IN A MANNER THAT PROVIDES FOR PROTECTION OF THE ENVIRONMENT?**

Authority: 585.102(a)(2) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Visually check the waters surrounding the facility when en route to, approaching, departing, or passing a facility by boat, helicopter, or fixed wing aircraft. Look for sheens, slicks, wastes, and other pollutants originating from the facility, risers, or pipelines. During the facility inspection, check the water for signs of any pollutants.

IF NONCOMPLIANCE EXISTS

Issue a warning **(W)** INC if:

The cause of the discharge has been identified and corrected prior to the inspection or observation, and no further pollution is occurring.

Issue a component shut-in **(C)** INC if:

A specific component has been determined to be the cause of pollution and the pollution is ongoing at the time of the inspection or observation.

Issue a facility shut-in **(S)** INC if:

More than one specific component has been determined to be the cause of the pollution and the pollution is ongoing at the time of the inspection or observation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

T-802 **DOES THE OPERATOR ENSURE ACTIVITIES AUTHORIZED IN THIS PART ARE CARRIED OUT IN A MANNER THAT PROVIDES FOR PREVENTION OF WASTE?**

Authority: 585.102(a)(3) **Enforcement Action: W/C/S**

Verify that lessee's operating procedures includes written guidance that describe the requirements for proper disposal of materials or by- products to the environment.

IF NONCOMPLIANCE EXISTS

Issue a warning **(W)** INC if:

The cause of the discharge has been identified and corrected prior to the inspection or observation, and no further pollution is occurring.

Issue a component shut-in **(C)** INC if:

A specific component has been determined to be the cause of pollution and the pollution is ongoing at the time of the inspection or observation.

Issue a facility shut-in **(S)** INC if:

More than one specific component has been determined to be the cause of the pollution and the pollution is ongoing at the time of the inspection or observation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

COMPANY INFORMATION

T-803 **HAS THE LESSEE NOTIFIED BOEM INFORMED OF THE COMPANY'S MERGER, NAME CHANGE, OR CHANGE OF BUSINESS FORM?**

Authority: 30 CFR 585.109 **Enforcement Action: W**

INSPECTION PROCEDURE:

Review BOEM office file records to determine if the company information and the information for the officer or agent authorized to be served with process is current and correct.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for each company file audit if the information is not correct or current.

INSPECTION COUNT/ INC COUNT:

Issue one warning **(W)** INC for not notifying BOEM within 120 days of any company mergers, name changes, or change of business form.

BONDING

T-804 **DOES THE LESSEE MAINTAIN THE APPROPRIATE BOND OR FINANCIAL ASSURANCE INSTRUMENT AS REQUIRED?**

Authority: 30 CFR 585.525 **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Verify that the lease specific bond complies with each stage of the lease.
2. Verify that the supplemental bond or other financial assurance complies with BOEM requirements.
3. Verify, using Treasury Circular 570, that the Surety is capable of providing a bond of the requested financial assurance amount.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of bonding coverage if bonding requirements are not met.

Issue one facility shut-in **(S)** INC for one or more facilities on a lease if bonding requirements are not met within the time specified for correction.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per bond audited.

T-805 **HAS THE LESSEE NOTIFIED BOEM WITHIN 3-BUSINESS DAYS AFTER LEARNING THAT AN ACTION WAS FILED ALLEGING THAT THE LESSEE, THE SURETY, OR THE GUARANTOR PROVIDING REQUIRED FINANCIAL SECURITY ARE INSOLVENT OR BANKRUPT?**

Authority: 30 CFR 585.530 **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that BOEM was notified within 3-buisness days after the lessee learned an action was filed alleging that the lessee, the surety, or the guarantor are bankrupt or insolvent.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of required financial coverage if BOEM was not notified as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease audited.

T-806 **IF THE LESSEE'S BOND OR FINANCIAL ASSURANCE IS REDUCED IN VALUE DURING THE TERM OF THE REQUIRED FINANCIAL COVERAGE, HAS THE LESSEE PROVIDED ACCEPTABLE ALTERNATIVE FINANCIAL COVERAGE TO BOEM?**

Authority: 30 CFR 585.531 **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. If the value of a bond submitted as security to BOEM has decreased in value, verify the lessee has provided evidence of additional alternative financial security to BOEM within 45 days or such shorter period of time as BOEM may direct.
2. If a bond submitted as security to BOEM has lapsed during the required term of the coverage, verify that acceptable alternative financial security is promptly provided to BOEM.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of bonding coverage if acceptable alternative financial coverage was not provided, but has since been submitted.

Issue one facility shut-in **(S)** INC for one or more facilities covered by a required bond if acceptable alternative financial coverage was not provided within the specified time period to BOEM.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease audited.

PLANS AND INFORMATION REQUIREMENTS

T-807 **HAVE REQUIRED PLANS AND REPORTS BEEN RECEIVED AND ANY NECESSARY APPROVALS OBTAINED PRIOR TO CONDUCTING AN ACTIVITY OR OPERATION WITHIN THE TIME FRAME SPECIFIED BY REGULATIONS?**

Authority: 30 CFR 585.600 **Enforcement Action: W/C/S**

601(a)
601(b)
601(c)
615(a)
700 702
711
902(a)
902(d)
824(a)
824(b)
912

INSPECTION PROCEDURE:

Verify that submittals (i.e., SAP, COP, GAP, Facility Design Report, Fabrication and Installation Report etc.) have been provided in the time frame required, and that required applications have been submitted and approvals obtained prior to conducting an activity or operation, i.e. plans for resource data gathering, self inspections, operations, and the testing of technology devices, surveys and activities.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted.

Issue one component shut-in **(C)** INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

T-808 **DOES THE LESSEE MAINTAIN AND MAKE RECORDS AVAILABLE FOR INSPECTION BY BOEM PERSONNEL?**

Authority: 30 CFR 585.602 **Enforcement Action: W**

714

INSPECTION PROCEDURE:

1. Verify that Lessee maintains and provides to BOEM upon request all data and information related to compliance with required terms and conditions of your SAP, COP, or GAP.
2. Verify the availability of all records relative to the operation and maintenance of the facility.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the lessee:

1. Denies access to any facility covered by the lease or regulations.
2. Does not make pertinent records available for inspection.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per report audited.

SITE ASSESSMENT PLAN (SAP)

T-809 **ARE ACTIVITIES CONDUCTED IN ACCORDANCE WITH THE SITE ASSESSMENT PLAN (SAP) WHICH HAS BEEN APPROVED BY BOEM?**

Authority: 30 CFR 585.617(b)

INSPECTION PROCEDURE:

Verify that:

1. Operations are being conducted in accordance with Lessee's approved SAP, and that it is available for review during the audit.
2. Verify that an "approval letter" from BOEM concerning acceptance of the "SAP" is available for review.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel or equipment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation if it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.

Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

CONSTRUCTION AND OPERATION PLAN (COP)

T-810 **ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH THE CONSTRUCTION AND OPERATIONS PLAN (COP) WHICH HAS BEEN APPROVED BY BOEM?**

Authority: 30 CFR 585.620 **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that:

1. Operations are being conducted in accordance with Lessee's approved COP, and that it is available for review during the audit.
2. Verify that an "approval letter" from BOEM concerning acceptance of the "COP" is available for review.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel or equipment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation if it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.

Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

GENERAL ACTIVITY PLAN (GAP)

T-811 **DOES THE LESSEE'S GENERAL ACTIVITIES PLAN (GAP) INCLUDES REQUIREMENTS FOR LIMITED LEASES, ROW GRANTS, AND RUE GRANTS?**

Authority: 30 CFR 585.640 **Enforcement Action: W/C/S**
641
650

INSPECTION PROCEDURE

Verify that:

1. GAP describes all proposed construction, activities, and conceptual decommissioning plans for all planned facilities, including testing of technology devices and onshore and support facilities that Lessee will construct and use for their project, including any project easements for the assessment and development of limited lease or grant.
2. BOEM approved the COP before operator began any of the approved activities on the lease.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel or equipment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation if it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.

Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

T-812 **DID THE LESSSEE NOTIFY BOEM IN WRITING BEFORE CONDUCTING ANY ACTIVITIES NOT DESCRIBED IN APPROVED GENERAL ACTIVITIES PLAN (GAP)?**

Authority: 30 CFR 585.655 **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

1. Verify that lessee notified BOEM in writing before conducting any activities not described in their approved GAP.
2. Verify that Lessee describes in detail the type of activities they are proposing to conduct.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted. Issue one component shut-in **(C)** INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review without notifying BOEM.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

CERTIFIED VERIFICATION AGENT

T-813 **DID THE LESSEE UTILIZE A CERTIFIED VERIFICATION AGENT (CVA) AS REQUIRED BY BOEM TO REVIEW AND CERTIFY THE FACILITY DESIGN REPORT, THE FABRICATION AND INSTALLATION REPORT, AND THE PROJECT MODIFICATIONS AND REPAIR REPORT?**

Authority: 30 CFR 585.705 **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify from office records that a certified verification agent (CVA) reviewed and certified the following reports:

1. Facility design report
2. Fabrication and installation report
3. Project modification and repair report

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

T-814 **HAS THE LESSEE MET THE REQUIREMENTS AND RECEIVED APPROVAL TO HAVE BOEM WAIVE THE CERTIFIED VERIFICATION AGENT (CVA)?**

Authority: 30 CFR 585.705(b) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify from office records that a written approval was received from BOEM to waive a certified verification agent (CVA).

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

ENVIRONMENTAL AND SAFETY MANAGEMENT, INSPECTIONS, AND FACILITY ASSESSMENTS

T-815 **DOES THE OPERATOR CONDUCT ACTIVITIES ON THEIR LEASE OR GRANT USING TRAINED PERSONNEL AND TECHNOLOGIES, PRECAUTIONS, AND TECHNIQUES THAT WILL NOT CAUSE UNDUE HARM OR DAMAGE TO NATURAL RESOURCES??**

Authority: 30 CFR 585.800 **Enforcement Action: W/C**

INSPECTION PROCEDURE:

Verify that:

1. Lessee's training plan provides a process to ensure that employees understand and can perform their assigned job duties safely.
2. Lessee's is utilizing the best available and safest technology (BAST) technologies, precautions, and techniques that will not cause undue harm or damage to natural resources

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more employees if the training plan fails to provide a process to ensure that employees understand and can perform their assigned job duties.

Issue one component shut-in **(C)** INC for one or more employees that do not understand or cannot perform their assigned job duties.

Note: The employee is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

T-816 **DOES THE OPERATOR REPORT TO BOEM THE POTENTIAL ARCHAEOLOGICAL RESOURCEWHILE CONDUCTING APPROVED ACTIVITIES?**

Authority: 30 CFR 585.802(a)(1)-(2) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that:

1. All reporting requirements listed in 30 CFR 585. 802 have been included and submitted to BOEM upon discovery of a potential archaeological resource.
2. Lessee notified BOEM within 72 hours of an archaeological discovery and that all seafloor disturbances activities within the area of discovery were halted.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked / issue one INC per audit.

SAFETY MANAGEMENT SYSTEMS

T-817 **DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE HOW THEY WILL ENSURE SAFETY OF PERSONNEL OR ANYONE ON OR NEAR THEIR FACILITIES?**

Authority: 30 CFR 585.810 (a) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

1. Verify that lessee's SMS plan includes procedures, which directly address human factors issues associated with the interaction between facility and personnel.
2. Verify that these procedures address safe and environmentally sound operations.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

T-818 **DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE THEIR REMOTE MONITORING, CONTROL, AND SHUT DOWN CAPABILITIES?**

Authority: 30 CFR 585.810(b) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that Lessee's SMS include procedures for sound operation of each facility that are consistent with the safety and environmental information including but not limited to startup, normal operations, temporary operations, simultaneously operations, remote monitoring operations, emergency shutdown and isolation, and normal shutdown.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

T-819 **DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE THEIR EMERGENCY RESPONSE PROCEDURES?**

Authority: 30 CFR 585.810(c) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that Lessee's SMS include procedures for emergency action plans such as:

1. Spills of hazardous substances
2. Collisions
3. Fire
4. Oil spill contingency plan.
5. Safety and environmental information

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

T-820 **DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE THEIR FIRE SUPPRESSION EQUIPMENT ?**

Authority: 30 CFR 585.810(d) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that Lessee's SMS include procedures for fire suppression equipment such as:

1. Firewater system (if needed)
   A. Visually inspect to verify that firewater systems are installed.
   B. Request that operator initiate actuation test of all fire water systems and pumps on facility.
2. Chemical system - Visually inspect to verify that chemical systems are installed.
3. Verify that a diagram of the firefighting system showing the location of all firefighting equipment is posted in a prominent place on the facility.
4. Visually inspect to verify that fire (flame, heat, or smoke) sensors are installed.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

T-821 **DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE HOW AND WHEN THE SAFETY MANAGEMENT SYSTEM WILL BE TESTED?**

Authority: 30 CFR 585.810(e) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

1. Verify that Lessee's SMS include a test program and procedures that covers:
   a. The activities and areas to be considered in tests.
   b. The frequency of tests
   c. The test team
   d. How test will be conducted
   e. Test reporting
2. Verify through records review that SMS is being tested.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

T-822 **DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE HOW LESSEE WILL ENSURE PERSONNEL WHO OPERATE THEIR FACILITY ARE PROPERLY TRAINED?**

Authority: 30 CFR 585.810(f) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that

1. Procedures are developed to ensure that persons assigned to operate and maintain the facility posses the required knowledge and skills to carry out their duties and responsibilities.
2. Lessee's training plan includes procedures on verifying that employees received training once any alterations in facilities require new or modification of existing operating procedures.
3. Lessee's training plan includes procedures on verifying that employees received training on operating procedures, safe work practices, and emergency response and control measures.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in **(C)** INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment. Issue a facility shut-in **(S)** INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility, per enforcement action.

MAINTENANCE AND SHUTDOWNS

T-823 **HAS BOEM BEEN NOTIFIED WITHIN 24 HOURS WHEN EQUIPMENT IS REMOVEDFROM SERVICE FOR MORE THAN 12 HOURS?**

Authority: 30 CFR 585.813 **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

1. Verify that the lessee or the ROW holder has reported any equipment taken out of service to BOEM
2. Verify from office records that a written report was submitted to BOEM within three business days prior to equipment removal for more than 12 hours.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

T-824 **HAS BOEM BEEN NOTIFIED WHEN EQUIPMENT IS RETURNED TO SERVICE?**

Authority: 30 CFR 250.813 (3) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has reported to BOEM when equipment is returned to service.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for failure to notify BOEM when equipment is returned to service.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

EQUIPMENT FAILURE AND ADVERSE ENVIRONMENTAL EFFECTS

T-825 **HAS THE LESSEE SUBMITTED TO BOEM A REPORT ON THE MAJOR REPAIR OF FACILITY DAMAGE OR THE FAILURE OF PIPELINE, CABLE, OR OTHER EQUIPMENT?**

Authority: 30 CFR 250.815 (a) **Enforcement Action: W/C**

Definition: Major Repair is a corrective action involving structural members affecting the structural integrity of a portion of or all the facility.

INSPECTION PROCEDURE:

1. Verify that a detailed report on the repair of equipment was submitted to BOEM after completion of the repairs.
2. Verify that the detailed report includes the required information.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for equipment repair if a detailed report on the repair does not include:

1. Description of the repairs;
2. Results of test; and
3. Date equipment was returned to service.

Issue one component shut-in **(C)** INC for a pipeline or pipeline component repair if:

1. A detailed report on the repair was not submitted to BOEM after completion of the repairs.
2. After a review of the report, BOEM cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per equipment audit.

T-826 **IF REQUESTED BY BOEM HAS THE LESSEE SUBMIT A COMPREHENSIVE WRITTEN REPORT OF ANY CABLE, PIPELINE, OR FACILITY DAMAGE ANALYZED?**

Authority: 30 CFR 250.815(c) **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that a comprehensive written report of the analysis of any cable, pipeline, or facility damage or failure was submitted by the lessee to BOEM when requested.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a cable, pipeline, or facility damage or failure audit if a comprehensive written report of the analysis of the cable, pipeline, or facility damage or failure was not submitted to BOEM within the time frame specified.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

T-827 **HAS A PLAN OF CORRECTIVE ACTION FOR ENVIRONMENTAL OR OTHER CONDITIONS ADVERSELY AFFECTING A CABLE, PIPELINE, OR FACILITY BEEN SUBMITTED TO BOEM?**

Authority: 30 CFR 585.816(a) **Enforcement Action: W/C**

INSPECTION PROCEDURE:

Verify that a plan of corrective action of observed detrimental environmental factors affecting a cable, pipeline, or facility was submitted to BOEM within 30 days of the observation.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for a corrective plan audit if a plan of corrective action for observed detrimental environmental factors affecting a pipeline was not submitted to BOEM for approval within 30 calendar days of the observation.

Issue one component shut-in **(C)** INC for a corrective plan audit if:

1. A plan of corrective action was not prepared for known detrimental environmental factors that would affect a cable, pipeline, or facility.
2. After a review of the report, BOEM cannot determine that proposed corrective action would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

Note: The cable, pipeline, or facility is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per component audited.

T-828 **DOES LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DETERMINE WHETHER PROPER SAFETY EQUIPMENT HAS BEEN INSTALLED AND IS OPERATING SAFELY?**

Authority: 30 CFR 585.820(b) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that safety equipment is installed and operated in accordance with Lessee's safety management system program.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted.

Issue one component shut-in **(C)** INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

T-829 **DOES LESSEE CONDUCT COMPREHENSIVE ANNUAL SELF-INSPECTIONS ON ALL OF THEIR FACILITIES?**

Authority: 30 CFR 585.824 **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that

1. Lessee developed a comprehensive annual self-inspection plan covering all facilities.
2. Self- inspections are being conducted at prescribed or approved intervals.
3. Weather conditions, e.g. fog, solid ice, that prevent self-inspections are recorded in the inspection log.
4. Inspection records are being maintained at the facility or a nearby manned facility.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in **(C)** INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

T-830 **DOES LESSEE DEVELOP A COMPREHENSIVE SELF-INSPECTION PLAN THAT ADDRESS SELF- INSPECTIONS ABOVE – WATER AND BELOW -WATER FOR ALL OF THEIR FACILITIES?**

Authority: 30 CFR 585.824 (a)(1)-(2) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that lessee's inspection plan addresses

1. The type, extent, and frequency of in-place inspections conduct for both the above-water and the below - water structures of all facilities and pertinent components of the mooring systems for any floating facilities;
2. Monitoring the corrosion protection for both the above-water and below-water structures.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in **(C)** INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

T-831 **DID LESSEE ANNUALLY SUBMIT TO BOEM A REPORT ON THEIR COMPREHENSIVE ANNUAL SELF-INSPECTIONS NO LATER THEN NOVEMBER 1ST EACH YEAR?**

Authority: 30 CFR 585.824(b) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE

Verify that lessee's report includes

1. A list of facilities inspected in the preceding 12 months;
2. Type of inspection employed, (i.e., visual, magnetic particle, ultrasonic testing)
3. A summary of the inspection indicating what repairs, if any, were needed and the overall structural condition of the facility.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one facility shut-in **(S)** INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility.

ACCIDENT REPORTING

T-832 **HAS BOEM BEEN NOTIFIED WITH A WRITTEN REPORT WITHIN 15 DAYS OF THE INCIDENT INVOLVING ALL: FATALITIES, INJURIES INVOLVING LOST TIME AND EVACUATION, FIRES, EXPLOSIONS, COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS, SAFETY SYSTEM DAMAGES, PERSONNEL/MATERIAL HANDLING ACTIVITIES, FIREFIGHTING SYSTEMS, ALL INCIDENTS THAT RESULT IN DAMAGES GREATER THAT $25,000, AND ALL INCIDENTS THAT REQUIRE PERSONNEL TO MUSTER FOR EVACUATION?**

Authority: 30 CFR 250.831 **Enforcement Action: W**
30 CFR 250.832

INSPECTION PROCEDURE:

1. Verify that BOEM has been notified of all the above listed incidents connected with any activities on a lease.

2. Verify that all reporting requirements listed in 30 CFR 585. 831, 833 have been included and submitted to BOEM in a written report within 15 days of the incident.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an incident/accident on a lease if BOEM has not been notified by the lessee as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per incident audited.

T-833 **HAS BOEM BEEN ORALLY NOTIFIED COMMUNICATION IMMEDIATELY FOLLOWING INCIDENTS INVOLVING ALL: FATALITIES, INJURIES REQUIRING EVACUATION, FIRES, EXPLOSIONS, COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS AND SAFETY SYSTEM DAMAGES, PERSONNEL/MATERIAL HANDLING ACTIVITIES, FIREFIGHTING SYSTEMS, ALL INCIDENTS THAT RESULT IN DAMAGES GREATER THAT $25,000, AND ALL INCIDENTS THAT REQUIRE PERSONNEL TO MUSTER FOR EVACUATION?**

Authority: 30 CFR 250.831 **Enforcement Action: W**
250.832
250.833

INSPECTION PROCEDURE:

1. Verify that BOEM has been notified of all the above listed incidents connected with any activities on a lease.
2. Verify that all reporting requirements listed in 30 CFR 585.831, 832 have been included and submitted to the District Manager via oral communication immediately following the above incident.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an incident/accident on a lease and/or OCS facility if BOEM has not been notified by the lessee or operator as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per incident audited.

DECOMMISSIONING

T-834 **DID LESSEE SUBMIT DECOMMISSIONING APPLICATION AND RECEIVE APPROVAL FROM BOEM BEFORE DECOMMISSIONING?**

Authority: 30 CFR 585.902(b)-(c) **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that decommissioning operations are being conducted after submitting and receiving approval from BOEM on decommissioning application.

Note: The approval of the decommissioning concept in the SAP, COP, or GAP is not an approval of a decommissioning application

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations on a facility if the violation(s) of the stipulation(s) poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in **(C)** INC for an audit of one or more operations on a facility if the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment; and operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in **(S)** INC if a violation of the stipulation poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease audited.

T-835 **DID LESSEE SUBMIT A DECOMMISSIONING NOTICE TO BOEM FOLLOWING THE APPROVAL OF THE DECOMMISSIONING APPLICATION?**

Authority: 30 CFR 585.905 **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that lessee submitted a decommissioning notice to BOEM at least 60 days before commencing decommissioning activities.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC for an audit of one or more operations on a facility if the violation(s) of the stipulation(s) poses no immediate danger to personnel, equipment, or the environment.

Issue one facility shut-in **(S)** INC if a violation of the stipulation poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease audited.

T-836 **DID LESSEE SUBMIT A DECOMMISSIONING APPLICATION IN THE SPECIFIED TIMEFRAME?**

Authority: 30 CFR 585.905 **Enforcement Action: W/C/S**

INSPECTION PROCEDURE:

Verify that lessee submitted a decommissioning application upon the earliest of the following dates:

1 2 years before the expiration of lease.
2 90 days after completion of your commercial activities on a commercial lease.
3 90 days after completion of approved activities under a limited lease on a ROW grant or RUE grant.
4 90 days after cancellation, relinquishment, or other termination of lease or grant.

IF NONCOMPLIANCE EXISTS:

Issue one warning **(W)** INC if lessee did not submit a decommissioning application in the specified timeframe.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease audited.

T-837 **IS THE FACILITY DECOMMISSIONED AS REQUIRED AND HAS ALL APPROPRIATE APPLICATION INFORMATION BEEN PROVIDED TO BOEM?**

Authority: 30 CFR 585.906 **Enforcement Action: W**
908
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INSPECTION PROCEDURE:

1. Verify (witness or from records) that facilities are removed to a depth of at least 15 feet below the mud line.
2. Verify that required information is correct on all applications

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if the facility is not removed as required.

INSPECTION COUNT/ INC COUNT:

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

T-838 **DID LESSEE AFTER REMOVAL OF THE FACILITY, CABLE OR PIPELINE SUBMIT A WRITTEN REPORT TO BOEM WITHIN THE SPECIFIED TIME FRAME?**

Authority: 585.912 **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Verify that lessee submitted to BOEM a written report within 60 days after removal of the facility, cable, or pipeline.
2. Verify that the written report meets the requirements listed in 585.912

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if the lessee did not submit a written report with the required information to BOEM within the specified timeframe.

INSPECTION COUNT/ INC COUNT:

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