United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001

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This letter is in response to your correspondence from 08/09/2013 to the Bureau of Safety and Environmental Enforcement's (BSEE) pertaining to the information quality available on our website.

In your submission, you identified 57 data points concerning accident information on our website that may have been recorded before the Lease Effective Date or after the Lease Expiration Date on Outer Continental Shelf blocks. That information is updated regularly and is available at the following link: http://www.data.bsee.gov/homepg/data_center/other/tables/safetylist.asp. Furthermore, you mention that BSEE may have a data integrity problem in each of the cited data points.

In order to better understand the data points you reference, BSEE staff in the Gulf of Mexico regional offices reviewed each of 57 to determine what was involved during the particular accident. These regional staff members utilized the information available from our district investigation reports which are available on BSEE's website at this link: http://www.bsee.gov/Inspection-and-Enforcement/Accidents-and-Incidents/District-Investigation-Reports/. Each of these reports provides a detailed description of what occurred during these accidents. Staff then cross-referenced whether these reports and the data points listed matched.

After researching each of the identified data points, BSEE has determined that the data displayed on our website is correct and no data quality problems currently exist. The accidents you cite in your correspondence occurred during activities that did not require a lease to be active. Under 30 CFR 25.188, offshore operators are required to immediately notify BSEE of the following types of incidents: fatalities; injuries that require evacuation of the injured person; loss of well control; fires and explosions; collisions that result in property or equipment damage of more than $25,000; incidents involving structural damage to an Outer Continental Shelf (OCS) facility; incidents involving crane operations; and incidents involving damage to safety systems and equipment. BSEE coordinates closely with the U.S. Coast Guard and other federal and state agencies to determine how to effectively respond to the incident and to determine which agency will be the primary investigator. The primary goal of every BSEE incident investigation is to determine what happened to cause an incident so that the agency can act to minimize the likelihood that a similar incident will occur in the future.

In order to illustrate these findings, BSEE developed the attached spreadsheet which categorized each of the 57 data points into one of seven designations listed below. Each of the designations will provide an explanation into which activities occurred at the time of the accident.

- **Decommissioning Activities (DECOM):** Event associated with decommissioning activities on an expired or terminated lease.
- **Independent from Lease (INDEP):** Event associated with an activity independent from the lease in question.
- **Pollution Incident (POLL):** Pollution event associated with the expired lease.
- **Right of Use Activity (RUE):** Event associated with an accessory platform on a Right-of-Use and Easement.
- **Right of Way Activity (ROW):** Event associated with an accessory platform associated with a Right of Way.
- **Production Activity (PROD):** Event associated with a separate production activity on a neighboring lease.

The BSEE believes this letter and the attached spreadsheet should answer all of the data integrity assertions and any questions you may have with your submission. Should you have any further questions or concerns, please feel free to contact me at douglas.morris@bsee.gov

Finally, you do have the right to appeal BSEE's finding. The right to appeal is available if there is any dissatisfaction with our decision regarding this request. The appeal should be addressed to Margaret Schneider, BSEE Deputy Director, and can be submitted via email: margaret.schneider@bsee.gov or physical mail to 1849 C Street, NW, Mail Stop 5438, Washington, DC 20240 within 30 days after receiving this letter.

Respectfully,

Douglas W. Morris
Chief,
Office of Offshore
Regulatory Programs

Attachment