# United States Department of the Interior

BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
WASHINGTON, DC 20240-0001


January 22, 2016

Jack Gerard
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005-4070

Dear Mr. Gerard,

I am following up on an ongoing issue from 2014 concerning the failure of components in critical safety equipment that are used during drilling operations on the OCS.

As you may know, we have been working to address a recurring problem of connector and bolt failures in risers and blowout preventers. These failures are of great concern to BSEE as the problem has been recurring in some manner for nearly a decade, beginning in 2003. An occurrence of bolt failures in December 2012 prompted a global recall of the bolts associated with the H4 connector bolts manufactured by GE Oil and Gas.

The findings arising out of BSEE investigation of the 2012 incident were: (1) existing industry standards do not adequately address bolting/connector performance in subsea marine applications, (2)industry quality assurance standards such as API Spec Q1 do not adequately address the use of multiple tiers of subcontractors during the fabrication process, and (3) increased reporting of equipment issues within the industry is necessary. We have been actively working with the API standards committees to address these deficiencies and have made presentations to the industry at the API Winter Standards meeting in January 2015 and the BSEE International Standards Forum in May 2015.

Although progress is being made in addressing these safety issues, I am concerned that the industry is not moving quickly enough given the potential for a catastrophic failure. In fact, since the 2012 incident that resulted in the global recall, two additional connector failures have occurred. The latest failure occurred within the last 30 days. The fact that these failures involved equipment from the three primary manufacturers of this equipment suggests that this is a systematic industry problem that requires immediate attention.

BSEE's Well Control Rule, when finalized, will help to improve overall equipment reliability for well control equipment. However, the specific remedy for the failures noted above rests in the development of better industry standards and practices. I believe that industry needs to take proactive steps to quickly remedy the defects that have been described above.

To increase safety on the Outer Continental Shelf (OCS), I am asking that you lead an effort to galvanize your members behind a concerted effort to create the necessary industry standards that provide consistent manufacturing requirements and procedures. In addition, closer scrutiny of all of the connectors and bolts being employed on the OCS should also be undertaken by each of

your members to ensure that they are not still employing any connectors or bolts that have the issues that were identified in the BSEE investigation.

In the interest of quickly addressing this important issue, I would like to meet with you within the next month to discuss a way forward for a more timely resolution of this critical issue. Please have your office work with my Chief of Staff, Tom Lillie (202-208-6286), to arrange the meeting.

Sincerely,

Brian M. Salerno
Director