UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT GULF OF MEXICO REGION

ACCIDENT INVESTIGATION REPORT

For Public Release

1.	OCCURRED S	TRUCTURAL DAMAGE
		RANE
2.	OPERATOR: Panther Operating Company, LLC D. REPRESENTATIVE: II TELEPHONE: H CONTRACTOR: R REPRESENTATIVE: S	THER LIFTING AMAGED/DISABLED SAFETY SYS. NCIDENT >\$25K 2S/15MIN./20PPM EQUIRED MUSTER HUTDOWN FROM GAS RELEASE THER
3.	OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVISOR ON SITE AT TIME OF INCIDENT:	8. OPERATION:
		X PRODUCTION
4.	LEASE:	DRILLING WORKOVER
	AREA: MP LATITUDE: BLOCK: 268 LONGITUDE:	COMPLETION
	BLOCK. 200 LONGITUDE.	HELICOPTER MOTOR VESSEL
5.	PLATFORM:	X PIPELINE SEGMENT NO. 11015
	RIG NAME:	X OTHER Construction - Pipeline SSTI
6.	ACTIVITY: EXPLORATION(POE) DEVELOPMENT/PRODUCTION	9. CAUSE:
7.	(DOCD/POD) TYPE:	
	INJURIES:	EQUIPMENT FAILURE HUMAN ERROR
	HISTORIC INJURY OPERATOR CONTRACTO	R EXTERNAL DAMAGE
	REQUIRED EVACUATION	K SLIP/TRIP/FALL WEATHER RELATED
	$\Box LTA (1-3 days)$	X LEAK
	LTA (>3 days) RW/JT (1-3 days)	UPSET H20 TREATING OVERBOARD DRILLING FLUID
	RW/JT (>3 days)	OTHER
	FATALITY Other Injury	10. WATER DEPTH: 205 FT.
		11. DISTANCE FROM SHORE: 41 MI.
	X POLLUTION FIRE	12. WIND DIRECTION: N
	EXPLOSION	SPEED: 1 M.P.H.
	LWC HISTORIC BLOWOUT UNDERGROUND	13. CURRENT DIRECTION: N SPEED: 2 M.P.H.
		14. SEA STATE: 2 FT.
	DEVERTER SURFACE EQUIPMENT FAILURE OR PROCEDURES	
	COLLISION HISTORIC >\$25K <- \$25K	

INCIDENT SUMMARY:

On 30 June 2022, a pollution event occurred while conducting operations to modify an existing 18" oil Pipeline Segment Number (PSN) 11015/ROW OCS-G 16048 by installing a subsea tie-in assembly. The PSN 11015 is located in the 268 Block of the Main Pass (MP) Area and connects MP 255-A to F/S Boundary MP 69. While conducting operations to install a connection for a future pipeline PSN 20793, operators noticed pipeline pressures were dropping from 485 psi to 0 psi (indicating a leak). Over a 3-day period, an estimated 90 barrels of oil were discharged into the Gulf of Mexico.

SEQUENCE OF EVENTS:

On 11 February 2022, the Bureau of Safety and Environmental Enforcement (BSEE) granted approval to Panther Operating Company, LLC (Panther) for the modification of existing PSN 11015/ROW OCS-G 16048 by installing a subsea tie-in assembly.

On 30 June 2022, during operations to perform the permitted scope of work, an incident occurred while the pipeline was being cut. The event and subsequent corrective actions were provided by Panther in a detailed summary below:

"On June 30, 2022, at approximately 2346 hrs diving crews were working on the PSN 11015 modification per the approved permit. After installing an approximate 120 -foot 8" diameter temporary bypass and purging the inactive section of 18" diameter pipe between the bypass linestops, the dive crew started to cut the 18" pipeline with a diamond wire saw. As the pipe was being cut and was approximately 65% complete the pipe suddenly separated from some unknown stored energy moving each end (upstream/downstream) in opposite directions of the cut point. With this sudden movement the 8" bypass piping and downstream hot tap BISEP line stop assembly twisted. Due to this unexpected torsion/tension, the temporary 8" by-pass sheared at a flange connection and released approximately 90 barrels of crude oil into the Gulf of Mexico. At the time of the release the Third Coast Operations Control Center saw a significate pressure drop on the system, and immediately closed the upstream and downstream main line valves and contacted all producer platforms to additionally shut in. All valves and producer platforms were shut -in within approximately 8 minutes. The dive crew also responded by repositioning a previously deployed pollution dome over the largest subsea release point and were able to contain part of the release (27 barrels recovered). Third Coast's incident management team, Forefront Emergency Management, were notified immediately. An Incident Command System (ICS) was initiated, a command post established, and an Oil Spill Response Organization (OSRO) contacted and mobilized. Criteria for immediate notification to regulatory bodies was met, and a call was placed to the National Response Center (NRC) at 0123 hrs on July 1, 2022 (NRC# 1340284). A similar notification call was placed to BSEE at 0139 hrs on the same day. The dive crews further inspected the line-stops (both upstream and downstream of the temporary by-pass); which continued to hold main line pressure without leaks.Similarly, all tie -in locations along the system were confirmed closed off and holding pressure without leaks. After the tie -in inspections were completed and no additional product was confirmed being released, the dive crews removed the damaged flange pieces and installed blind skillets to secure the pipe from any future possible releases until permanent repairs could be implemented. A 48-hr call was placed to the NRC at 1807 hrs on July 2, 2022 (NRC# 1340452) to update quantity release, location, and remediation efforts. Aerial monitoring of the sheen was conducted multiple times a day starting at daybreak on July 1, 2022. The ICS demobilized on July 4, 2022, with the sheen nearly dissipated, and any future release significantly mitigated. At that point, the original pipeline modification procedure was resumed. PSN 11015 remained shut in until July 12, 2022, at 1800 hrs after full system integrity checks were completed and the original modification procedure was nearly complete."

MMS - FORM 2010

On 1 July 2022 at approximately 0130 hrs, BSEE received notification of the incident and was provided with updates over the next several days. The incident occurred on a subsea pipeline located 205 ft below the surface - onsite investigation is not applicable.

On 15 July 2022, BSEE received a follow-up report from Third Coast, LLC. Final estimate of oil discharged over a 3-day period was 90 barrels. The report also provided an action to prevent future similar discharges of stored energy on a Third Coast pipeline that is under some type of construction work, all available historical information will be thoroughly reviewed to determine if the potential for an increase in stored energy exists, and if necessary additional control measures will be implemented to mitigate substantial movement of the pipeline prior to commencing.

BSEE determined that the response time to shut in the MP 270 platform was inadequate. Panther should have confirmed communication with the operator of the platform prior to making the cut. This lack of communication caused significantly more pollution.

CONCLUSIONS:

Prior to the work being done on the PSN 11015 BSEE approved modification, operations did not account for or expect the amount of stored energy within the pipeline that led to the 8" by-pass sheering off at a flange connection and releasing oil into the Gulf of Mexico.

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

• Human Performance Error - Not aware of hazards: Personnel were not aware of the amount of stored energy within the pipeline.

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

• Communication - Lack of Communication: Operator failed to confirm communication with a pipeline contributor prior to performing a pipeline cut.

20. LIST THE ADDITIONAL INFORMATION:

21. PROPERTY DAMAGED:

NATURE OF DAMAGE:

ESTIMATED AMOUNT (TOTAL):

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

The BSEE New Orleans District has no recommendations for the Office of Incident Investigations at this time.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: NO

For Public Release

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

25. DATE OF ONSITE INVESTIGATION:

26. INVESTIGATION TEAM MEMBERS:

27. OPERATOR REPORT ON FILE:

Nathan Bradley /

- 28. ACCIDENT CLASSIFICATION:
- 29. ACCIDENT INVESTIGATION PANEL FORMED: NO OCS REPORT:
- 30. DISTRICT SUPERVISOR:

David Trocquet

APPROVED DATE: 14-SEP-2022

MMS - FORM 2010

EV2010R