



# United States Department of the Interior

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

March 3, 2017

## Memorandum

To: Michael Idziorek, Panel Chair  
Lars Herbst, BSEE Gulf of Mexico Region Director  
Doug Morris, Chief Office of Offshore Regulatory Programs

From: Margaret N. Schneider, Acting Director

Subject: Review of Panel Report for Keathley Canyon Block 96

I have reviewed the panel report, "Investigation of October 20, 2015 Fatality During Pipe Handling." The report presented a number of findings and conclusions regarding the pipe handling operations that ultimately led to the death of Samuel Whitley, a floor hand employed by Pacific Drilling. I thank the panel for their work and accept the report. As follow up to the recommendations, I am directing that the Safety and Environmental Management Systems (SEMS) National Program Manager work collaboratively with the Gulf of Mexico region subject matter experts to take several follow up actions.

The individual died after sustaining traumatic injuries to his head while performing his assigned work of ensuring drillpipe was clear to be moved, by the pipe handling system, from racking area to the drillfloor by the Assistant Driller. The panel report identifies a number of failures in the application of basic safety management practices that may have contributed to the death. In particular, the Panel found potential inadequacies in the job safety analysis, personnel's knowledge and assessment of equipment and potential hazards, supervisory oversight, and the level of detail in the operating procedures. These are all critical components of a robust SEMS program that extends from the operator to the drilling contractor through a properly designed SEMS bridging document.

I am directing the National Program Manager for SEMS within the Office of Offshore Regulatory Programs, working with the Regional Directors and appropriate staff to:

- Issue a safety bulletin that underscores the need for continuous review and updating of hazard analysis, including as appropriate, careful oversight of employees for adherence to the hazard reduction measures outlined in a Job Safety Analysis and in recognition of the employees' experience levels.
- Assess whether a stand-alone safety bulletin should be issued that addresses precautions and verification procedures for operations using a vertical pipe

handler that does not have an automated mechanism to alert the operator as to the position of the finger board latches but instead relies on a person working near the pipe stands to notify the operator if there were any obstructions.

- Assess whether a company- wide audit of the operator's SEMS program is appropriate to ensure that any deficiencies in drilling contractor's procedures that implement the operator's SEMS program have been corrected through a proper bridging document.

I request that timelines for completion of the above items be provided to me in writing within two weeks. Please consult and coordinate with the panel members during this process.

Please contact me if you have any questions regarding what actions need to be taken based on the report. I would again like to thank the Panel for its efforts in investigating this fatal incident and developing the panel report.