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November 3, 2017

Doug Morris
Chief Office of Offshore Regulatory Programs
Bureau of Safety and Environmental Enforcement
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Via email

Dear Mr. Morris:

As part of API and Industry's commitment to improving training, operating procedures, technology and industry standards, attached is a detailed and comprehensive update showing progress of the voluntary actions taken by Industry to address issues related to subsea bolts and fasteners. As we have discussed, this is ongoing work and progress will be reported as new information becomes available. Notably we have made progress on the near term commitment, which entails replacing all critical bolting having a hardness greater than 35HRC. Ninety-Four percent of our BOPs have the required replacement bolting ordered and 59% have completed the replacement for all active BOPs in the Gulf of Mexico. The attached documents show progress made by Industry on the following bolting topics:

- Research sponsored by API related to this topic;
- Activity by the standards task groups and subcommittees to implement the recommendations in the API Multi Segment Task Group Report on Bolting Failures;
- Voluntary industry adoption of API 20 E/F for critical BOP bolting;
- Voluntary industry replacement of critical bolting having a hardness of >35 HRC;
- Enhanced QAQC of 3rd party manufactured bolting (i.e., sampling, 20 E/F requirements);
- Updated make-up procedures, with additional engineering rigor and oversight;
- Elimination of electroplated Zinc coatings for subsea/marine applications; and
- Enhanced failure reporting with wider distribution.

API appreciates the opportunity to work with BSEE to continue discussing our shared objective of safe operations. As can be seen by the significant progress we've made as an Industry since 2016, we believe that by working in a spirit of cooperation, we can better understand how to best achieve our common goals and, thus, implement actions to help reach our shared safety objectives. We look forward to

discussing this report in detail during our November 29, 2017, webex. If you have any questions in the meantime, please contact me by phone at (202)682-8439, or by e-mail at https://november.29, 2017, webex. If you have any questions in the meantime, please contact me by phone at (202)682-8439, or by e-mail at https://november.29, or by e-mail at https://november.29.

Sincerely,

Holly A. Hopkins

cc: Lars Herbst, GOM Regional Director

Attachment



November 2017

API 3Q 2017 UPDATE ON INDUSTRY ACTIVITIES ON SUBSEA BOLTS AND CONNECTORS

Background

On August 11, 2014 the Bureau of Safety and Environmental Enforcement (BSEE) released a technical Review of Connector and Bolt Failures following the failure of connectors and bolts used in critical equipment. The technical review, entitled Evaluation of Connector and Bolt Failures, was completed by the bureau's Quality Control-Failure Incident Team (QC-FIT) and submitted to BSEE Director Brian Salerno. The objective of the technical assessment was to document and evaluate failures of the connectors, studs and other components used in critical equipment and determine if there were industry wide issues that need to be addressed by the industry or BSEE. This report addressed a December 2012 incident which prompted a global recall of the bolts associated with the H4 connector bolts.

In response to the QC-Fit Report, API held a Technical Session during the API Exploration and Production Winter Standards Meeting in New Orleans on January 27, 2015. BSEE was invited by API to present their report findings and recommendations. After the Technical Session, an API multi-segment task group was formed to review the detailed recommendations in the report and determine next steps. The final report of the task group was shared with BSEE in March of 2016 and is now being implemented.

An incident in February of 2014 involving a lower marine riser package (LMRP) connector leak prompted BSEE to issue an Addendum to the QC-FIT report, with the new information from this incident.

As a result of these ongoing incidents BSEE issued a Safety Alert regarding Connector and Bolt Failures on February 2, 2016. Additionally, BSEE held a public forum on offshore connector equipment failures, including connector bolt failures that have occurred on the OCS, on August 29, 2016, in Washington, DC.

To address the February 2016 safety alert API formed a workgroup which has met with BSEE numerous times to improve safety offshore as it relates to bolts. This work focuses on subsea BOP bolting and 4 specific areas: 1) Materials/Standards; 2) QA/QC — API Monogram Program; 3) Operations; and 4) Research.

API provides this detailed and comprehensive update to track the progress and implementation of the voluntary industry actions to address the issues related to subsea bolts and connectors. This is ongoing work that may evolve as new information becomes available and this is the fifth of regular quarterly reports.

		Торіс	Discussion
1	Research	API sponsored research	API has approved a 2017 project to perform testing to determine susceptibility to environmental hydrogen embrittlement of selected materials and coatings. A contract has been executed to begin work on testing of API 20E fasteners for susceptibility to hydrogen embrittlement under cathodic protection in simulated seawater. Specimen preparation in in progress. Another contract has been executed for the testing of alternatives to zinc electroplating coatings. The Task Group Chairman and Sub-Group Chairmen will be visiting the test laboratory in October to review testing protocol. In addition, API has conducted 4 projects related to hydrogen embrittlement and 21 projects related to corrosion resistant alloys.
-		ADLCA 21st Edition	·
		API 6A 21st Edition API 6D 24th Edition	Being drafted and is expected to require API 20E bolts. API 20E is a recommendation in published document.
	Materials and Standards	API 6DSS 3rd Edition	Requires API 20E and API 20F for pressure boundary bolts in the document published August 2017.
		API 16A 4th Edition	Bolting conforming to API 20E or API 20F is a requirement for pressure controlling bolting, closure bolting and pressure retaining bolting in the document published April 2017.
2		API 16AR 1st Edition	Bolting conforming to API 20E or API 20F is a requirement for pressure controlling bolting, closure bolting and pressure retaining bolting in the document published April 2017.
		API 16B 1st Edition	Currently under development and is expected to adopt the TGR-3 bolting recommendations and text to meet 20E or 20F.
		API 16C 3rd Edition	Currently under development. For subsea bolting, the draft document requires BSL3 as per 20E or 20F as applicable; however, the document is silent on zinc electroplating.
		API 16F 2nd Edition	Document expected to be published soon and requires API 20E and API 20F.
		API 16ST 2nd Edition	Currently under development and is expected to adopt the TGR-3 bolting recommendations and text to meet 20E or 20F.

		Topic	Discussion
		API 17D 3rd Edition	Being drafted and is considering the TGRs.
		API 17G 3rd Edition	Ballot did not meet consensus. New draft being developed. Requires API 20E or API 20F for fasteners.
		API 17TR8 2nd Edition	Ballot closed (2/1/2017) and is currently in comment resolution.
		API 20E 2nd Edition	Published February 2017
		API 20F 2nd Edition	Ballot closed 9/13/2017 and is currently in comment resolution.
		API 53 5th Edition	Group developing changes for 5th edition. Goal to have document out for ballot 4Q17.
		API 64 3rd Edition	API S64 has completed ballot, re-ballot and comment resolution. The document is with API for final editorial changes.
		API Q1, 9th Edition, Addendum 2	New addendum sent to ballot (#4214) and closed 10/11/2017. Additional controls for supply chain added.

		Trogress on Research, Waterlan	
		Topic	Discussion
3		TGR-1 - SC21 TG notes that there is conflict between B633 and F1941 related to requirements for hydrogen embrittlement mitigation. B633 requires stress-relief and bake for product greater than 31 HRC. F1941 does not require stress-relief and requires bake for product greater than 39 HRC. API should contact ASTM to request resolution of this conflict. If this cannot be achieved through ASTM, then API needs to issue an equivalent document under API through SC21. In either case, the revised or new document will then need to be adopted by product SCs. This work should also include requirements for maximum hardness on bolting material.	ASTM Committee B08 issued a B08 Main Committee ballot to add process controls and returned B633 to the 39 HRC bake threshold. Ballot received, as expected, several negative votes. The negative votes will be considered at the ASTM Committee B08 meeting in November in Atlanta. Ballot item sponsors will present arguments and data to address the objections raised by the negative voters. As a result of the discussion one of the following actions will be taken: Negative upheld and the item must be dropped or rewritten, Negative withdrawn by the negative voter, Negative found not related to the revision and must be considered as new business, Negative found not persuasive for technical reasons. All but the second action must be passed by vote. Actions 2, 3 or 4 will result in publication of the revision. (See also actions under TGR-4 and TGR-18.)
	TG Recommendations	TGR-3 - SC21 TG recommends prohibiting Zinc electroplating for Subsea/Marine application. TG further recommends that an investigation be conducted under the direction of SC21 to determine a better short term (storage) corrosion protection system that would not create hydrogen in service. The results of this study would then need to be adopted into product standards.	Phase 1 testing (SnZn, ZnNi, Zn Flake, TDC Zn Alloy, NiCo Electroplated Zn) has been contracted and specimen preparation is about to begin. A trip to McGill University has been set up for October 24 th for any task group members who wish to visit the McGill University Hydrogen Embrittlement Facility headed by Salim Brahimi. The goal of the trip is to discuss testing already performed and test equipment exclusively available at McGill to reducing testing costs, and obtain more relevant and meaningful results. Testing expected to begin by 1st QT 2018.

Торіс	Discussion
TGR-4 - SC21 TG recommends consideration of an overarching document issued by API through SC21 in cooperation with product SCs covering selection of proper bolting materials for different environments (including subsea) would be helpful.	The document is ready for a comment only ballot in SC21. (Expected before year-end.)
TGR-8 - SC21 Do not allow use of B7 or L7 grades above 2.5" in diameter.TG recommends that this be included as part of the overarching document under SC21.	Done for SC21. Do not allow the use of ASTM A320 L7/ASTM A193 B7 bolting for diameters above 2 ½ inches unless the Di of the material is intentionally modified. The review was completed and recommendation submitted to not allow use above 2.5" without special qualification. Done. The recommendation has been provided to SC6, SC16 and SC17 and will also be covered in the overarching document.
TGR-18 - SC21 Product subcommittees should review and consider incorporating 20E and 20F requirements (resolve existing conflicting properties specified in product specifications such as hardness).	*Ties into TGR-1* (This work is in response to the TGR-1 request to establish maximum hardness for bolting material.) Objective is to identify hardness and associated yield limit to prevent HISC in subsea fasteners. The contract for testing has been issued and specimen preparation has begun. Actual testing expected to begin in 4 th QT.
TGR-2 - SC20 TG recommends that API expand 20E to more adequately cover the requirements of plating and coating as well as move the supplemental requirements for plating and coating into the body of the document, making them standard requirements.	Done.
TGR-9 - SC20 TG recommends that volumetric examination where bolt diameter exceeds 2.5" should be added as a requirement to 20E, 20F, BSL-2, and BSL-3.	Done for API 20E. Covered in API 20F Second Edition (now passed ballot and in comment resolution).

	Topic	Discussion
	TGR-11 - SC20 Revise 20F to restrict use of sulfur based lubricants during manufacture of bolting.	Requirements added API 20F Second Edition (now passed ballot and in comment resolution).
	TGR-17 - SC20 Strengthen heat treating and furnace loading requirements in 20E and 20F (more prescriptive requirements related to: spacing, QTC location, and thermocouple placement). Include requirements for oven calibration for pre and post bake operations.	Done for API 20E. Added to API 20F Second Edition (now passed balloted and in comment resolution.
	TGR-20 - SC20 SC20 review the supplier controls in 20E and 20F to ensure these adequately cover required controls for subcontracted processes. SC 20 should also monitor the API Q1 revisions.	Done for API 20E. Added to API 20F Second Edition (now passed ballot and in comment resolution).
	TGR-19 - SC18 SC18 to form a TG to review the BSEE FIT-QC Report on connector bolt failures to determine if the current requirements of API Spec Q1 has the provisions needed to ensure that system control features are in place, and clearly stated, to eliminate these type of failures in the future.	Done, TG formed.
	TGR-3 - SC17 TG recommends prohibiting Zinc electroplating for Subsea/Marine application. TG further recommends that an investigation be conducted under the direction of SC21 to determine a better short term (storage) corrosion protection system that would not create hydrogen in service. The results of this study would then need to be adopted into product standards.	SC17 (17D, 17G) to consider results of investigation

Topic	Discussion
TGR-5/TGR-12 - SC17 -TG recommends that the product specifications require equipment manufacturers to specify acceptable thread compounds for bolting applications based on material, plating and service. -TG recommends adding requirements to API product specifications to restrict combining these elements in thread compounds.	SC17 (17D, 17G) to consider results of investigation
TGR-6 - SC17 Torqueing requirements should be reviewed to determine if standardization among product specifications is needed.	SC17 (17D, 17G) to consider results of investigation
TGR-13 - SC17 Guidance should be issued by API on when and how to perform fatigue sensitivity analysis on bolting.	Workgroup completed a comprehensive report to address TGR-13 and TGR-14. The topics for the reports are: a. Issue to address: Fatigue sensitive bolting b. Bolting fatigue analysis procedures (address TGR-13) c. Bolting material/fatigue properties testing requirements (address TGR-13) d. Material environmental effects e. Propose manufacturing practices to progress current industry practices (address TGR-14) 1. Requirements to meet BSL-3 of API 20E and 20F 2. Material manufacturing process: threading (rolled, machined), surface coating, recommendation of CRA bolting for subsea applications) 3. Vickers vs. HRC / Locations of testing 4. First article qualifications e. Bolting material testing program for fatigue properties (eventual request to SC21). SR3 proposed research presented to CSOEM for approval.

Торіс	Discussion
TGR-14 - S Involved API SC's should address gu specs to require use of BSL-3 in fat	e. Propose manufacturing practices to progress current industry practices (address TGR-14)
TGR-16 - S TG recommends API issue a docum derating of bolting. There are sever derating due to elevate	ral specifications on material SC17 (17D, 17G) to consider results of investigation
TGR-18 - S Product subcommittees should revie 20E and 20F requirements (resolve of specified in product specificate)	ew and consider incorporating existing conflicting properties SC17 (17D, 17G) to consider results of investigation

Торіс	с	Discussion
ir det syste	TGR-3 - SC16 TG recommends prohibiting Zinc electroplating for ubsea/Marine application. TG further recommends that an investigation be conducted under the direction of SC21 to etermine a better short term (storage) corrosion protection tem that would not create hydrogen in service. The results of study would then need to be adopted into product standards.	16C - For subsea bolting, the draft document requires BSL3 as per 20E or 20F as applicable; however, the document is silent on zinc electroplating. 16A - Completed 16ST - The 2nd Edition of API RP 16ST is currently under development and is expected to adopt the TGR-3 bolting recommendations and text to meet 20E or 20F. 16B - The 1st Edition of API Spec 16B is currently under development and is expected to adopt the TGR-3 bolting recommendations and text to meet 20E or 20F. 16D - Will discuss this in the 4th Edition or via addendum if deemed necessary. 16F - Completed
com and s	TGR-5/TGR-12 - SC16 TG recommends that the product specifications require equipment manufacturers to specify acceptable thread mpounds for bolting applications based on material, plating serviceTG recommends adding requirements to API product pecifications to restrict combining these elements in thread compounds.	16C – Is expected to be addressed in the 4th edition (next revision). 16A - Completed 16ST - The 2nd Edition of API RP 16ST is currently under development and is expected to reference the recommendations to be contained in operating manuals of Spec 16B equipment, including assembly and disassembly information, as well as flange make-up procedure (requirements for lubricant, torque, tightening pattern, percentage increments for torque, etc.) 16B - The 1st Edition of API Spec 16B is currently under development and is expected to contain the following requirement for all operating manuals of 16B equipment: assembly and disassembly information, that includes flange make-up procedure that includes requirements for lubricant, torque, tightening pattern, percentage increments for torque, etc. 16D - Will discuss this in the 4th Edition or via addendum if deemed necessary.

	Tania	Dispussion
	Topic	Discussion
	TGR-6 - SC16 Torqueing requirements should be reviewed to determine if standardization among product specifications is needed.	16C - Will be addressed in the 4th edition (next revision). 16A - Completed 16ST - The 2nd Edition of API RP 16ST is currently under development and is expected to reference the recommendations to be contained in operating manuals of Spec 16B equipment, including assembly and disassembly information, as well as flange make-up procedure (requirements for lubricant, torque, tightening pattern, percentage increments for torque, etc.) 16B - The 1st Edition of API Spec 16B is currently under development and is expected to contain the following requirement for all operating manuals of 16B equipment: assembly and disassembly information, that includes flange make-up procedure that includes requirements for lubricant, torque, tightening pattern, percentage increments for torque, etc. 16D - Will discuss this in the 4th Edition or via addendum if deemed necessary.
	TGR-13 - SC16 Guidance should be issued by API on when and how to perform fatigue sensitivity analysis on bolting.	16A - API 16A 4th edition does not currently contain requirements for fatigue analysis. The HPHT sub-group may consider this requirement. 16ST - The 2nd Edition of API RP 16ST is currently evaluating the specific locations within the assembly of well control components where fatigue analysis of bolting is needed, especially in assembly of coiled tubing and snubbing well control components. 16B - The 1st Edition of API Spec 16B is currently evaluating the need for fatigue analysis of bolting, especially in assembly of coiled tubing and snubbing well control components. 16D – Completed - Task group has not noted any areas where fatigue sensitivity analysis is deemed necessary. 16F - API 16F does not currently contain requirements for fatigue analysis.

	Topic	Discussion
	TGR-14 - SC16 Involved API SC's should address guidance issued in the product specs to require use of BSL-3 in fatigue sensitive applications.	16C - Completed 16A - Completed 16ST - BSL-3 is expected to be required in the 1st Edition of API Spec 16B for all closure bolting and pressure retaining bolting intended for offshore applications. 16B - BSL-3 is expected to be required in the 1st Edition of API Spec 16B for all closure bolting and pressure retaining bolting intended for offshore applications. 16D - Completed - Task group has not noted areas of fatigue sensitive applications to date. 16F - Completed
	TGR-15 - SC16 TG recommends revision to API S53 to define a standard method for calculating watch circle.	Completed - S53 Will not incorporate this recommendation as it is outside the scope of S53.

Topic	Discussion 16A - Currently, this is only addressed in: API TR 6AF1 Technical Report on TemperatureDerating on API Flanges Under Combination of Loading. Note: 16A, 3rd edition only has temperature
	ratings up to 250F. The referenced 6AF1 provides guidance for derating based on temperature beginning at 350F. Temperature derating is primarily a concern in HPHT applications. This is expected to be addressed in the new 16A HPHT annex.
TGR-16 - SC16 TG recommends API issue a document to provide guidance on derating of bolting. There are several specifications on material	16ST - The 2nd Edition of API RP 16ST is currently evaluating the need for derating of bolting due to bending stresses and temperature, especially in assembly of coiled tubing and snubbing well control components.
derating due to elevated temperature.	16B - The 1st Edition of API Spec 16B is currently evaluating the need for derating of bolting due to bending stresses and temperature, especially in assembly of coiled tubing and snubbing well control components.
	16D – Completed – Task group has not identified any areas of our specification that would be effected by elevated temperatures.
	16F - HPHT is expected to be addressed in the next edition.
TGR-18 - SC16 Product subcommittees should review and consider incorporating 20E and 20F requirements (resolve existing conflicting properties specified in product specifications such as hardness).	16C - Completed 16A - Completed 16ST - The 2nd Edition of API RP 16ST is expected to incorporate 20E and 20F requirements. 16B - The 1st Edition of API Spec 16B is expected to incorporate 20E and 20F requirements. 16D - Completed - Decided not to require them for the 3rd edition. Manufacturers will be required to provide documented bolting specifications where applicable. 16F - Completed

Торіс	Discussion
TGR-3 - SC6 TG recommends prohibiting Zinc electroplating for Subsea/Marine application. TG further recommends the investigation be conducted under the direction of SC2 determine a better short term (storage) corrosion protes system that would not create hydrogen in service. The rethis study would then need to be adopted into product states.	plating. API 6A 21st to consider results of investigation. Note identifies risk of hydrogen charging during plating. API 6DSS 3rd - Completed
TGR-5/TGR-12 - SC6 -TG recommends that the product specifications requequipment manufacturers to specify acceptable three compounds for bolting applications based on material, and service. -TG recommends adding requirements to API produspecifications to restrict combining these elements in tocompounds.	6A 21st edition in development, is expected to address thread compounds in Annex E. 6DSS 3rd – Completed.
TGR-6 - SC6 Torqueing requirements should be reviewed to determ standardization among product specifications is need	, , , , , , , , , , , , , , , , , , , ,
TGR-7/TGR-10 - SC6 TG recommends modification of 6A to require impact test below design temperature w/ acceptance criteria for larg section bolting (over 2.5").	

		Topic	Discussion
		TGR-13 - SC6 Guidance should be issued by API on when and how to perform fatigue sensitivity analysis on bolting.	See TGR-14
		TGR-14 - SC6 Involved API SC's should address guidance issued in the product specs to require use of BSL-3 in fatigue sensitive applications.	6A 21 st – Completed. Fatigue loading is outside the document scope. Annex B guides purchaser to define fatigue application of a product.
		TGR-16 - SC6 TG recommends API issue a document to provide guidance on derating of bolting. There are several specifications on material derating due to elevated temperature.	6A 21st edition in development, is expected to address de-rating due to temperature. 6DSS 3rd – Completed.
		TGR-18 - SC6 Product subcommittees should review and consider incorporating 20E and 20F requirements (resolve existing conflicting properties specified in product specifications such as hardness).	6A 21st Same as TGR-14 6D 24th API 20E is a recommendation in published document. 20E and 20F are in an informative annex that provides guidance to the manufacturer to use if requested. Plans are to make 20E BSL-1 mandatory for class rating 900 and higher on the next revision in late 2018. 6DSS 3rd – Completed.
4	QAQC	API Q1 9th Edition, Addendum 2	New addendum sent to ballot (#4214) and closes 10/11/2017. Additional controls for supply chain added.

Е	Topic	Discussion	OEM 1	OEM 2	OEM 3	OEM 1 Comments	OEM 2 Comments	OEM 3 Comments
1	Bulletin Identifying critical BOP bolting > 35 HRC	Attach any EB/PNI identifying critical bolting > 35 HRC	Completed - February 2016	Completed - February 24, 2016	Completed - October 2016	Product Notification & Improvement 16-008 issued 9/2016 Product Notification & Improvement 16-009 issued 9/2016 Product Notification & Improvement 16-010 issued 10/2016	Product Information Bulletin D4516545916 Released February 24, 2016	PA 40832 was generated in response to BSEE Safety Alert 318. Company does not provide bolts for pressure containing/pressure controlling with hardness greater than 35 HRC. See attachment. Revision 2 of PA 40832 was released in 12/2016 to communicate that Engineering Bulletin 962D (Torque guidance for critical bolting) was released and Company uses FPR to investigate field issues and uses Product Advisory or Product Safety Alerts to communicate issues to Company equipment owners.
2	replacement Bolting for critical BOP	Attach any EB/PNI identifying part numbers for critical bolting > 35 HRC	Completed - NA	Completed - 2016	Completed - October 2016	Product Notification & Improvement 16-008 issued 9/2016 Product Notification & Improvement 16-009 issued 9/2016 Product Notification & Improvement 16-010 issued 10/2016	All replacement bolting for critical BOP bolting meet API 20E BSL-3	Company has generated critical bolting part numbers for compliance to API 20E, BSL-3. These are available to our customers and more are being generated as needed. A few part numbers have been set up for 20F at this moment as CRA bolting is not normally provided in BOP equipment for critical bolting. See attachment with sample bolting part numbers.
3	Bulletin updating Torque Application	Attach any EB/PNI identifying updated Torque guidance for critical bolting	Completed - March 2016	Completed - February 24, 2016	Completed	Torque procedures issued. Operating procedures updated.	D4516545916 Released February 24, 2016. Torque requirements called out in PIB	EB-962D, released on March 2016. See attachment.
44	Internal process for enhanced failure reporting of critical bolting	Attach any example of updated failure reporting process. Attach any example of enhanced failure reporting related to critical BOP bolting	Completed - 1990's	Completed	Completed	Failure reporting and tracking through website. Reporting input from database into our system. This provides feedback to customers through tracking, responses, and drives failure analysis (RCA) if required.	We have fairly robust lines of communication on failures as is. Attached is an excerpt from PIB D4516545916. Customers should also refer to previous Company Product Information Bulletins and Safety Alerts for any additional information related to this issue and information regarding safe operation, maintenance, and inspection criteria by signing in to your MYCompany account and then searching with the Product Bulletin Search available below the heading 'Application Groups'. For information on registering, please visit company website. Please contact your local Service Center if you have any questions regarding this bulletin.	Company has internal procedure called Field Performanc Report (FPR) for capturing field performance failures of Company equipment. This FPR is the mechanisim used to initiate an investigation and determine the Root Cause of the failure. In addition, Company has a system to communicate Product Advisories (PA) and Safety Alerts (SA) as well as Engineering Bulletins (EB) to to our customers if deemed necessary resulting from an FPR investigation or internal reviews. The guidelines for these procedures are outlined in Company Engineering Procedure EP-307 (FPRs), CEP-030 (SAS/PAs) and PP-204 (EB). These procedures are considered "Confidential" and cannot be distributed outside of Company.
5	Updated QAQC standards for bolt manufacturing	Attach any example of updated QA process	Completed - August 2015	Completed	Completed - October 2016	QMS procedure improvements regarding supplier qualification. 20E vendor qualification and audit per family of fasteners, subtier supplier audit, review of mill audits. The supplier manufacturing process is locked and audited annually. Improved process incorporates supplier quality, engineering, quality teams and product documentation compliance to original qualification. Increased overall scrutiny on critical bolting incorporates engineering lockdown of parts and 3rd party onsite reviews.	Bolts specified to API 20E BSL-3. All our BSL bolting is only manufactured by vendors our QA department has physically audited and approved for critical fasteners. Per API 20E the manufacture of the finished part has to audit the mill producing the material for BSL. The documentation required of these vendors are as follows: Full Dimensional Inspection Report, Manufactures Material Test Report (Chemical and Mechanical), MPI Test Report (Ultrasonic Test Report, 100% Harrdness Testing (If Serialized), Steel Certificate of Test from the Mill, Mechanical Testing by independent Lab to ensure the product from the mill meets the BSL Requirements (Only if manufacture did not buy direct from mill), Heat Treat Certification, Micro-Structure Examination with Photo, Macro-Structure Examination with Photo, and Plating Certification.	Quality Plans (QP-000112-09) have been created for Pressure Containing and Primary Load Bearing Oil and Gas Equipment Used in Subsea Applications: API 6a, API 17D and API 20E. Bolting Specification BSL-3. QP-000112-09 is considered "Confidential" and cannot be distributed outside of Company.
Ь	2018+ Deliverables							
Α:		Attach any EB/PNI identifying part numbers for critical bolting	Completed - December 2016	Completed	Completed - October 2016	9/2016	16543557-001, 16569565-001, 16569606-001, 165096, 16587680-001, 16587681-001, 16587682-001. All part numbers refereced in PIB D4516545196	Company has generated critical bolting part numbers for compliance to API 20E, BSL-3. These are available to our customers and more are being generated as needed. A few part numbers have been set up for 20F at this moment as CRA bolting is not normally provided in BOP equipment for critical bolting. See attachment with sample bolting part numbers. PA 40832 Rev 02 addresses this item.
A	Replacement bolting coating specified	Attach any EB/PNI identifying replacement coating	In-Progress	Completed	Completed - October 2016	Product Notification & Improvement 16-010 issued 10/2016	Zinc-Nickel Plate - Plate to ASTM F1941	Company is engaging different vendors to find alternatives to electrodeposited zinc plating. Update 04/19/2017: Action still in progress. Estimated completion date: End of May 2017. Update 06/30/2017: Action still in progress. Estimated completion date: end of August 2017 Update 10/15/2017: We have identified and qualified replacement coating. We are currently working to qualify vendors.

Summary of Progress on Equipment Owner Operations (Q3, 2017)

			Not Started		In-Progress		Completed	
	Total Number of Active BOPs =	32	Number	Percent	Number	Percent	Number	Percent
Item	Topic	Discussion	,					
	2017 Deliverables							
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	0	0%	2	6%	30	94%
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	0	0%	13	41%	19	59%
3	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	0	0%	3	9%	29	91%
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	0	0%	0	0%	32	100%
5	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	0	0%	8	25%	24	75%
	- OEM SOF critical bolting per relevant specification		0	0%	5	16%	27	84%
	- MTRs per relevant specification		0	0%	5	16%	27	84%
	- Bolting audit to verify MTR information		0	0%	6	19%	26	81%
6	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	0	0%	11	34%	21	66%
	2018+ Deliverables							
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	9	28%	15	47%	8	25%
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	25	78%	7	22%	0	0%

			Rig 1 BOP 1	Rig 2 BOP 1	Rig 3 BOP 1	Rig 4 BOP 1
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	100%	100%	100%	NA
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	100%	In-progress	100%	NA
3	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	In-progress	Completed - July 15, 2014	In-progress	NA
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	2015 Training in Rig maint. Sys. 100% participation in GOM	Completed - July 20, 2016	2015 Training in Rig maint. Sys. 100% participation in GOM	NA
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	Completed	Completed - July 15, 2014	Completed	NA
5	- OEM SOF critical bolting per relevant specification		PA 40832 from OEM	Completed - July 15, 2014	PA 40832 from OEM	NA
3	- MTRs per relevant specification		Completed - October 2016	Completed - July 15, 2014	Completed - October 2016	NA
	- Bolting audit to verify MTR information		Completed - October 2016	Completed - July 15, 2014	Completed - October 2016	NA
6	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	Completed - 2015	Completed - March 15, 2016	Completed - 2015	NA
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	Being Quoted	0%	Being Quoted	NA
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	0%	0%	0%	NA

			Rig 4 BOP 2	Rig 5 BOP 1	Rig 5 BOP 2	Rig 6 BOP 1
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	NA	100%	100%	NA
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	NA	In-progress	In-progress	NA
	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	NA	Completed - March 9, 2015	Completed - March 9, 2015	NA
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	NA	Completed - July 20, 2016	Completed - July 20, 2016	NA
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	NA	In-progress	In-progress	NA
5	- OEM SOF critical bolting per relevant specification		NA	In-progress	In-progress	NA
3	- MTRs per relevant specification		NA	In-progress	In-progress	NA
	- Bolting audit to verify MTR information		NA	In-progress	In-progress	NA
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	NA	Completed - March 15, 2016	Completed - March 15, 2016	NA
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	NA	0%	0%	NA
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	NA	0%	0%	NA

			Rig 7 BOP 1	Rig 7 BOP 2	Rig 8 BOP 1	Rig 9 BOP 1
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	Completed - February 16, 2017	Completed - February 16, 2017	NA	90%
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	Completed - July 1, 2017	In-Progress (50%)	NA	100%
3	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	Completed - November 1, 2016	Completed - November 1, 2016	NA	Completed - Oct 4, 2016
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	Completed - November 1, 2016	Completed - November 1, 2016	NA	IOGP Failure reporting
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	Completed - November 1, 2016	Completed - November 1, 2016	NA	Completed - January 2017
5	- OEM SOF critical bolting per relevant specification		Completed - November 1, 2016	Completed - November 1, 2016	NA	Completed
3	- MTRs per relevant specification		Completed - November 1, 2016	Completed - November 1, 2016	NA	Completed
	- Bolting audit to verify MTR information		Completed - November 1, 2016	Completed - November 1, 2016	NA	Completed
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	In-Progress (50%)	In-Progress (50%)	NA	Completed - April 2017
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	In-Progress (11%)	In-Progress (11%)	NA	95%
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	Not Started	Not Started	NA	0%

			Rig 9 BOP 2	Rig 10 BOP 1	Rig 10 BOP 2	Rig 11 BOP 1
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	90%	100%	100%	NA
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	100%	In-progress	In-progress	NA
	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	Completed - Oct 5, 2016	Completed - March 9, 2015	Completed - March 9, 2015	NA
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	IOGP Failure reporting	Completed - July 20, 2016	Completed - July 20, 2016	NA
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	Completed - January 2017	In-progress	In-progress	NA
5	- OEM SOF critical bolting per relevant specification		Completed	In-progress	In-progress	NA
J	- MTRs per relevant specification		Completed	In-progress	In-progress	NA
	- Bolting audit to verify MTR information		Completed	75%	75%	NA
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	Complete phased array inspection on 90% of all critical bolting	Completed - March 15, 2016	Completed - March 15, 2016	NA
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	95%	0%	0%	NA
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	0%	0%	0%	NA

			Rig 12 BOP 1	Rig 12 BOP 2	Rig 13 BOP 1	Rig 14 BOP 1
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	NA	NA	NA	100%
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	NA	NA	NA	100%
	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	NA	NA	NA	Completed
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	NA	NA	NA	IOGP BOP Reliability Database
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	NA	NA	NA	Completed - December 2016
5	- OEM SOF critical bolting per relevant specification		NA	NA	NA	Completed
3	- MTRs per relevant specification		NA	NA	NA	Completed
	- Bolting audit to verify MTR information		NA	NA	NA	Completed
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	NA	NA	NA	Completed
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	NA	NA	NA	88%
	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	NA	NA	NA	0%

			Rig 14 BOP 2	Rig 15 BOP 1	Rig 15 BOP 2	Rig 16 BOP 1
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1 1		List by rig the % of API 20 E replacement bolts ordered	100%	NA	NA	100%
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	100%	NA	NA	100%
	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	Completed	NA	NA	Completed
	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	IOGP BOP Reliability Database	NA	NA	IOGP BOP Reliability Database
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	Completed - December 2016	NA	NA	Completed - December 2016
5	- OEM SOF critical bolting per relevant specification		Completed	NA	NA	Completed
3	- MTRs per relevant specification		Completed	NA	NA	Completed
	- Bolting audit to verify MTR information		Completed	NA	NA	Completed
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	Completed	NA	NA	Completed
	2018+ Deliverables			NA	NA	
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	88%	NA	NA	100%
	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	5%	NA	NA	0%

			Rig 17 BOP 1	Rig 17 BOP 2	Rig 18 BOP 1	Rig 18 BOP 2
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	100%	100%	Completed - February 16, 2017	Completed - February 16, 2017
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	In-progress	In-progress	In-Progress (10%)	Completed - May 1, 2017
- 3	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	Completed - March 9, 2015	Completed - March 9, 2015	Completed - November 1, 2016	Completed - November 1, 2016
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	Completed - July 20, 2016	Completed - July 20, 2016	Completed - November 1, 2016	Completed - November 1, 2016
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	In-progress	In-progress	Completed - November 1, 2016	Completed - November 1, 2016
5	- OEM SOF critical bolting per relevant specification		In-progress	Completed - September 22, 2017	Completed - November 1, 2016	Completed - November 1, 2016
3	- MTRs per relevant specification		In-progress	Completed - July 1, 2017	Completed - November 1, 2016	Completed - November 1, 2016
	- Bolting audit to verify MTR information		In-progress	Completed - June 1, 2017	Completed - November 1, 2016	Completed - November 1, 2016
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	Completed - March 15, 2016	Completed - March 15, 2016	In-Progress (50%)	In-Progress (50%)
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	0%	20%	Completed - Febuary 16, 2017	Completed - Febuary 16, 2017
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	0%	0%	In-Progress (20%)	In-Progress (10%)

			Rig 19 BOP 1	Rig 20 BOP 1	Rig 21 BOP 1	Rig 21 BOP 2
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	100%	100%	Completed - February 16, 2017	Completed - February 16, 2017
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	100%	100%	In-Progress (50%)	In-Progress (10%)
- 3	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	Completed	Completed March 29, 2016	Completed - November 1, 2016	Completed - November 1, 2016
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	IOGP BOP Reliability Database	Completed July 28, 2016	Completed - November 1, 2016	Completed - November 1, 2016
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	Completed - December 2016	Completed April 1, 2016	Completed - November 1, 2016	Completed - November 1, 2016
5	- OEM SOF critical bolting per relevant specification		Completed	Completed February 18, 2016	Completed - November 1, 2016	Completed - November 1, 2016
3	- MTRs per relevant specification		Completed	Completed April 1, 2016	Completed - November 1, 2016	Completed - November 1, 2016
	- Bolting audit to verify MTR information		Completed	Completed April 1, 2016	Completed - November 1, 2016	Completed - November 1, 2016
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	Completed	Completed April 1, 2016	In-Progress (50%)	In-Progress (50%)
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	0%	30%	In-Progress (20%)	In-Progress (20%)
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	0%	10%	Not Started	Not Started

			Rig 22 BOP 1	Rig 23 BOP 1	Rig 23 BOP 2	Rig 24 BOP 1
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	100%	100%	100%	100%
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	100%	100%	100%	100%
	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	Completed	Completed	Completed	OEM Manual and Procedures
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	IOGP BOP Reliability Database	IOGP BOP Reliability Database	IOGP BOP Reliability Database	Using OEM Failure Reporting Methods. IOGP Reporting Process in development
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	Completed - December 2016	Completed - December 2016	Completed - December 2016	Completed
5	- OEM SOF critical bolting per relevant specification		Completed	Completed	Completed	Completed
3	- MTRs per relevant specification		Completed	Completed	Completed	Completed
	- Bolting audit to verify MTR information		Completed	Completed	Completed	Completed
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	Completed	Completed	Completed	In-progress
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	100%	100%	100%	100%
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	50%	50%	0%	0%

			Rig 24 BOP 2	Rig 25 BOP 1	Rig 26 BOP 1	Rig 26 BOP 2
Item	Topic	Discussion	Status	Status	Status	Status
	2017 Deliverables					
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	100%	100%	Completed - February 16, 2017	Completed - February 16, 2017
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	100%	100%	In-Progress (10%)	Completed - May 1, 2017
3	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	OEM Manual and Procedures	Completed	Completed - November 1, 2016	Completed - November 1, 2016
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	Using OEM Failure Reporting Methods. IOGP Reporting Process in development	Completed	Completed - November 1, 2016	Completed - November 1, 2016
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	In-progress	Completed	Completed - November 1, 2016	Completed - November 1, 2016
5	- OEM SOF critical bolting per relevant specification		Completed	Completed	Completed - November 1, 2016	Completed - November 1, 2016
3	- MTRs per relevant specification		Completed	Completed	Completed - November 1, 2016	Completed - November 1, 2016
	- Bolting audit to verify MTR information		Completed	Completed	Completed - November 1, 2016	Completed - November 1, 2016
	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	In-progress	Critical bolting section added to PM Structure in the PM system and new PM tasks added to cover.	In-Progress (50%)	In-Progress (50%)
	2018+ Deliverables					
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	100%	Quote Received	In-Progress (11%)	In-Progress (11%)
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	0%	Quote Received	Not Started	Not Started

		Rig 27 BOP 1	Rig 28 BOP 1	
Item	Topic	Discussion	Comments	Status
	2017 Deliverables			
1	Replacement 20 E/F bolts for all > 35 HRC critical bolting ordered	List by rig the % of API 20 E replacement bolts ordered	100%	100%
2	Replacement 20 E/F bolts for all > 35 HRC critical bolting installed	List by rig the % of API 20 E bolts installed on the BOP	In-progress	100%
3	Rig Procedure for torqueing of critical bolting	Can include example rig procedure	Completed - July 15, 2014	In-progress
4	Internal process for enhanced failure reporting of critical bolts (IOGP Failure reporting procedure)	Can include example procedure for compliance with IOGP Failure reporting	Completed - July 20, 2016	Completed - May 8, 2015
	MTR review for installed critical bolting:	Can include letter from OEM, example of MTR audit	Completed - September, 2016	In-progress
5	- OEM SOF critical bolting per relevant specification		Completed - September 15, 2016	Completed - February 24, 2016
3	- MTRs per relevant specification		Completed - July 12, 2017	Completed - May 4, 2016
	- Bolting audit to verify MTR information		Completed - April 7, 2017	In-progress
6	Preventative maintenance (PM) for BOP bolting API Std 53	Can include PM for BOP bolting maintenance. Example of NDE performed on BOP bolts	Completed - March 15, 2016	Completed - December 9, 2015
	2018+ Deliverables			
A1	Critical bolting API 20 E/F replacement bolts ordered	List by rig % of bolts ordered	0%	0%
A2	Critical bolting API 20 E/F replacement bolts installed	List by rig % of bolts installed/replaced	0%	0%