

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

ACCIDENT INVESTIGATION REPORT

For Public Release

1. OCCURRED

DATE: 21-OCT-2022 TIME: 0910 HOURS

2. OPERATOR: Cox Operating, L.L.C.

REPRESENTATIVE:
TELEPHONE:
CONTRACTOR:
REPRESENTATIVE:
TELEPHONE:

- STRUCTURAL DAMAGE
- CRANE
- OTHER LIFTING
- DAMAGED/DISABLED SAFETY SYS.
- INCIDENT >\$25K
- H2S/15MIN./20PPM
- REQUIRED MUSTER
- SHUTDOWN FROM GAS RELEASE
- OTHER

3. OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVISOR ON SITE AT TIME OF INCIDENT: 8. OPERATION:

4. LEASE: G17182

AREA: HI LATITUDE:
BLOCK: A 472 LONGITUDE:

5. PLATFORM: A-PROCESS
RIG NAME:

- PRODUCTION
- DRILLING
- WORKOVER
- COMPLETION
- HELICOPTER
- MOTOR VESSEL
- PIPELINE SEGMENT NO.
- OTHER

6. ACTIVITY: EXPLORATION(POE)
 DEVELOPMENT/PRODUCTION (DOCD/POD)

9. CAUSE:

7. TYPE:

INJURIES:

- HISTORIC INJURY
 - REQUIRED EVACUATION
 - LTA (1-3 days)
 - LTA (>3 days)
 - RW/JT (1-3 days)
 - RW/JT (>3 days)
 - FATALITY
 - Other Injury
- OPERATOR CONTRACTOR

- EQUIPMENT FAILURE
- HUMAN ERROR
- EXTERNAL DAMAGE
- SLIP/TRIP/FALL
- WEATHER RELATED
- LEAK
- UPSET H2O TREATING
- OVERBOARD DRILLING FLUID
- OTHER _____

- POLLUTION
- FIRE
- EXPLOSION

- LWC
- HISTORIC BLOWOUT
 - UNDERGROUND
 - SURFACE
 - DEVERTER
 - SURFACE EQUIPMENT FAILURE OR PROCEDURES

COLLISION HISTORIC >\$25K <=\$25K

- 10. WATER DEPTH: 182 FT.
- 11. DISTANCE FROM SHORE: 82 MI.
- 12. WIND DIRECTION: SE
SPEED: 10 M.P.H.
- 13. CURRENT DIRECTION: E
SPEED: 2 M.P.H.
- 14. SEA STATE: 2 FT.
- 15. PICTURES TAKEN:
- 16. STATEMENT TAKEN:

17. INVESTIGATION FINDINGS:

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On 10-19-2022 at 17:33 hours, Cox Operating LLC submitted National Response Center (NRC) Incident report # 1350354, Regarding a pollution event that occurred at HI A 472 A, lease G17182. Cox Operating reported a sheen 60 yards long and 30 yards wide with an estimated 0.774 gallons of oil entered the Gulf of Mexico waters.

On 10-20-2022, the Bureau of Safety and Environmental Enforcement (BSEE) Lake Jackson District Inspectors conducted an onsite incident follow up inspection to the report. The Inspectors found an oil film from the helideck to the production deck. Facility crewmembers were in the process of cleaning up the oil. The Person in Charge (PIC) of HI A 472 A stated, the incident occurred while bringing the facility back online after being shut in for three days. During start up, with the system in by-pass, the back pressure valve (BPV) for the NBK 0420 Chemelectric Oil Treater (Treater) failed to operate as designed. The Treater's back pressure valve remained open sending 94 PSI of gas into the treater causing the Pressure Safety Valve to relieve to the relief header, then to the Vent scrubber Flare. The Vent Flare emitted a fine mist of oily water the atmosphere. Most of the oil fell onto the facility keeping it contained due to the prevailing winds; however, an estimated amount of 0.774 gallons landed in Gulf of Mexico waters.

On 10-21-2022 at 01:40 hours, NRC report # 1350473 detailing the National Oceanic and Atmospheric Administration satellite imagery detected a sheen measuring 2.44 nautical miles (NM) in length and 2.67 NM at the widest point in the vicinity of HIA 472 A. This NRC report is suspected to be associated with the previous NRC report # 1350354.

On 10-24-2022 the BSEE Lake Jackson District Accident Investigator and United States Coast Guard Pollution representative conducted an onsite Incident follow up inspection of the HI A 472 A. This onsite inspection showed little remaining signs of oily film on the facility. Plans to replace the failed Back Pressure Valve and approximately twelve (12) feet of 2'' piping was reviewed along with Cox Operating's start up and operating procedures.

On 10-26-2022, After discussion with the BSEE Lake Jackson District Manager, Accident Investigator, and Cox Operating HSE and Production Superintendent, the NRC report 1350931 was updated. Cox Operating reported a volume ("Based off an unconfirmed satellite image, they are using the minimum criteria of barely visible due to no one observing the sheen physically at the time image was taken"). The report estimated the amount to be 2.7145 barrels, with a sheen size 2.67 miles wide and 2.44 miles long, 70 percent coverage and 100 percent barely visible.

Cox Operating in support of a safe and cautious startup, will staff with an additional Operator and a Mechanic Totaling 3 (three) Operators and one Mechanic. One Operator at the Well Bay control panel, one at the Main control panel, and one on the production deck level to observe the vessel levels and observe for any leaks.

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

Failure of the NBK 0420 Chemelecttric Oil Treater Back Pressure Valve.

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

None

20. LIST THE ADDITIONAL INFORMATION:

None

21. PROPERTY DAMAGED:

NATURE OF DAMAGE:

Back Pressure Valve

Unserviceable

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ESTIMATED AMOUNT (TOTAL):

\$25,000

22. RECOMMENDATIONS TO PREVENT RECURRENCE NARRATIVE:

BSEE Lake Jackson District recommends the Office of Incident Investigations coordinate with the Office of Safety Management to follow up on Cox Operating, LLC operating procedures.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: **NO**

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

25. DATE OF ONSITE INVESTIGATION:

20-OCT-2022

28. ACCIDENT CLASSIFICATION:

26. Investigation Team Members/Panel Members:

Edward Keown / Steven Cline / Alvin O'Brien /

29. ACCIDENT INVESTIGATION PANEL FORMED:

NO

OCS REPORT:

27. OPERATOR REPORT ON FILE:

30. DISTRICT SUPERVISOR:

Stephen Martinez

APPROVED

DATE:

30-NOV-2022