Program Update
OOC Meeting

Lars Herbst, P.E.
Gulf of Mexico Region Director
Dec. 5, 2018

“To promote safety, protect the environment and conserve resources offshore through vigorous regulatory oversight and enforcement.”
Topics

Significant Incident Data
Risk Based Inspections
SEMS
Safe OCS
E Permitting Training
Idle Iron
Abandonment on Expired Leases
Upcoming PD Workshops
BSEE Safety Alert 343

- Establish minimum requirements for working at unguarded, elevated work locations
- Review job pre-planning procedures to ensure response plans, fall rescue plans, emergency response numbers, and fast response craft are included
- Consider equipment position and hazards when completing job pre-planning in order to minimize risk
- Verify company and contract personnel working at heights near or above water are knowledgeable and experienced in the work practices
- Review alert with offshore crews
Consider conducting visual inspections of natural gas burners, ensuring airtight integrity between flam arrestors and fire tubes

Ensure Operators are familiar with, and adhere to, OEM instructions regarding fired vessels and associated safety devices

Consider the use of a portable gas detector when operating in the vicinity of fired vessels

Conduct proper hazard analysis when opening process vessels and tanks
Soon to be released......

- Enchilada Safety Bulletin - Improper Execution Results in Explosion and Evacuation
- Safety Alert – Chemical Containment Release
- Safety Alert – Fractures Found on Stainless Steel Fittings
- Safety Bulletin – Corrosion Under Insulation
Risk Based Inspection (RBI) Program

- RBI Program implemented in March 2018 – BID 2018-033G

- Goal: BSEE analyzes raw inspection and incident data in order to create insightful and actionable inspections to continuously improve OCS performance.

- Since the implementation of the program in March 2018, BSEE has conducted three Facility Based Risk Inspections (Devil’s Tower, Turritella, and Jack St. Malo) and two Performance Based Risk Inspections (Cranes and Fired Vessels).

FBRI 2019 Schedule
- January 2019 – facility pending
- March 2019 – facility pending
- June 2019 – facility pending
- November 2019 – facility pending

PBRIs for FY 2019
- December 2018 – Well Operations
- April 2019 – Production Operations
- August 2019 – Combined Operations
- TBD – if specific issue arises in the year
SEMS: Significant Facts, Wins, Challenges:

- Corrective Actions must address systemic causes
- The quality of paperwork maintained to demonstrate SEMS “compliance” is less important than ensuring work is “done as designed”
- Lack of “operational discipline” and lack of evidence of leadership involvement in the safety of operations, may give BSEE concerns
- Directed Audits provide opportunities to examine the effectiveness of SEMS design, implementation and maintenance
- A system that supports and ensures adequate Marine Safety is another expectation of the SEMS regulation; the “E” in SEMS is just as important as the “S”
- Measuring success of “Performance-based” regulations like SEMS requires a success measure to be defined
- SEMS exists to promote **Continual Improvement** not to play “Gotcha!”
- Over 160 audits have been performed and reports submitted to BSEE since audits were first required in 2012
SafeOCS

- BSEE initiated the SafeOCS program to overcome the commercial and legal issues that previously restricted industry-wide sharing of data and information.
- SafeOCS uses an independent statistical agency (BTS) to conduct high-quality evaluations and statistical analysis of information submitted.
- Data submitted to BTS are protected from disclosure to regulators and the public by the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) and information shared by BTS is stripped of identifiable data under strict protocols.
- BSEE does not have access to the confidential data in BTS reports.
- CIPSEA provides for stiff criminal and civil penalties for the unauthorized release of such information.

Informational Event tomorrow (Dec. 6) in BSEE’s New Orleans Regional Office from 1-3 p.m. (Room 545), POC: Michael Pittman (703) 787-1844

https://SafeOCS.gov 1-844-OCS-FRST (1-844-627-3778)
**ePermits Modules will Cover All requests, Reports, and notifications**

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<th>PERMITS</th>
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<td>Structure Permits and Reports</td>
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<td>Well Analysis Requests and Reports</td>
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**ePermits Project:**

Dec 2018
- Available for Limited OOC eGov Team Testing
- Collecting Comments and Finalizing Modules

Jan 2019
- Available for everyone
- Training Provided TBA
### Yearly Structure Data

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Upcoming BSEE Meetings (tentative)

PD Seminar (Topics include: APM permitting procedures (smart sleeve completions), downhole commingling, gas-cap applications, and premature abandonment.)
Feb. 27
9 a.m. – noon
New Orleans Regional Office

Royalty Relief
April 17
New Orleans Regional Office
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