



Bureau of Safety and Environmental Enforcement

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

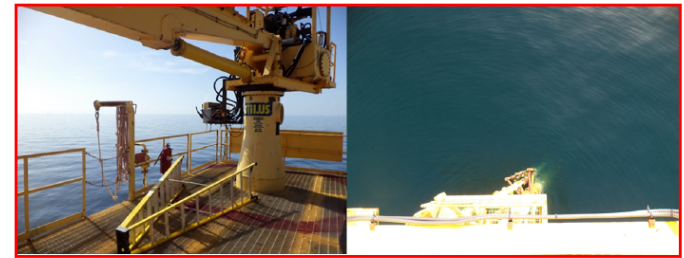
SAFETY ALERT



Safety Alert No. 343
19 November 2018

Contact: Jason Mathews
Phone: (504) 731-1496

Worker Falls from Height into Water



Location of crane mechanic at the time of the incident (left) and view over the handrail (right)

On 7 July 2018, a contract crane mechanic (CCM) fell 81 feet into the water below as he was replacing the platform crane's anti-two block control valve. A 10-ft ladder had been positioned between the overboard handrail and the crane for the CCM's use. As the CCM was positioned on the crane skid located seven feet above the deck, he realized that he needed to descend the ladder to retrieve additional tools. As the CCM repositioned himself onto the ladder in order to descend, he either lost his grip or his footing, which caused him to fall backwards over the handrail and into the water.

High winds prevented the CCM from retrieving a life vest initially thrown to him, but later he was able to retrieve a vest that had been placed in a life ring. Strong currents then caused him to drift further from the platform. Approximately 45 minutes after the incident began, a fishing vessel rescued the CCM and transported him back to the platform. The CCM was then flown onshore for treatment and was diagnosed with fractures of cervical and lumbar vertebrae.

The safe work practices in effect at the time of the incident required the CCM to use fall protection for heights that exceed six feet above the deck. Additionally, Coast Guard Regulation 33 CFR 146.20 requires the wearing of work vests when working near or over water. The CCM was using neither item, nor did the JSA identify falling as a potential hazard that necessitated mitigation.

BSEE Safety Bulletin 12 – GI 115

- Consider conducting visual inspections of natural gas burners, ensuring airtight integrity between flame 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

SAFETY BULLETIN



Safety Bulletin No. 012
30 August 2018

Contact: Harold Griffin
Phone: (504) 731-1485

Three Burn Injuries Due to External Heater Treater Fire

In November 2016, a fire occurred on an offshore production platform in the Gulf of Mexico, resulting in burn injuries to three workers. The Bureau of Safety and Environmental Enforcement (BSEE) investigated the incident to determine the cause(s) in an effort to prevent future occurrences.



Burn Damage (left), and the Gap in the Mating Flange in One of the Fire Tubes (right)

The BSEE investigation panel concluded that the fire occurred when flammable gases released when a thief hatch was opened on the dry oil tank to drain oil by hose from another vessel. The gas migrated from the tanks, located on the through the open thief hatch and into the fire tubes on the heater treater, located on the main deck. Both burners were still operating at the time, and the fire tube flame was able to propagate externally due to the existence of a sufficient gap in one of the fire tube mating flanges.

Additionally, the BSEE investigation panel concluded that other causes and contributing factors were the failure to follow safe work practices, insufficient hazard analysis, and failure to adhere to prescribed original equipment manufacturer (OEM) instructions and industry recommended practices and standards.

Therefore, the BSEE recommends that operators:

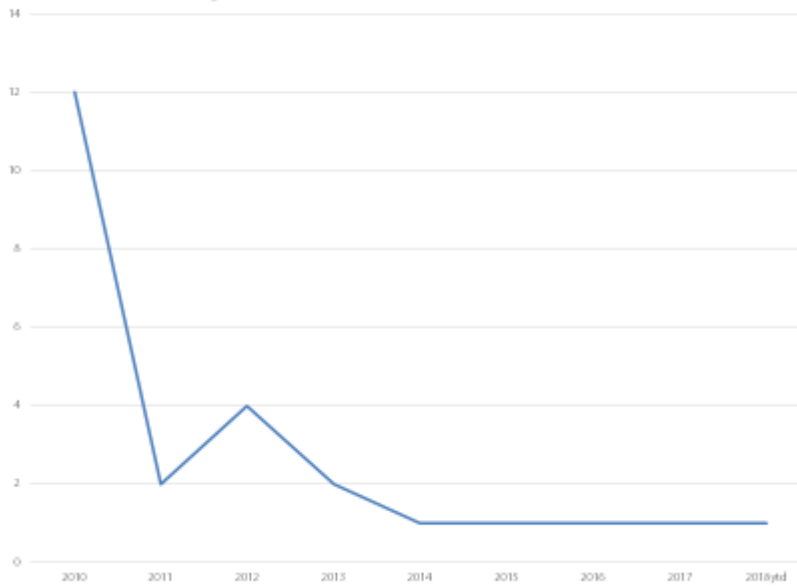
- Consider conducting visual inspections of natural draft burners, ensuring airtight integrity between flame arrestors and fire tubes.
- Ensure operators are familiar with, and adhere to, OEM instructions regarding start-up, operations, maintenance, and inspection of fired vessels and associated safety devices.
- Consider the use of a portable gas detector when operating in the vicinity of fired vessels.
- Conduct proper hazard analyses when opening process vessels and tanks.

A **Safety Bulletin** is a tool used by BSEE to share the lessons learned from an incident or a near miss. It also contains recommendations that should help prevent the recurrence of such an incident on the Outer Continental Shelf.

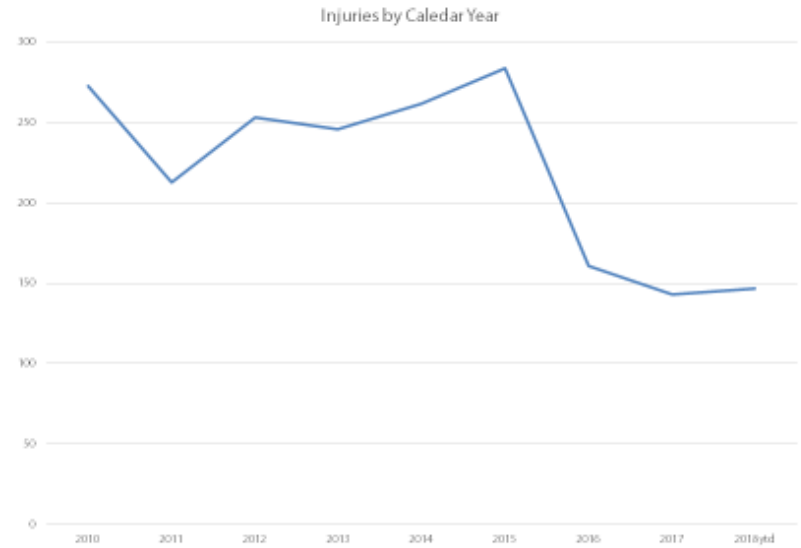
Soon to be released.....

- WR 469 Panel Report and Safety Bulletin - Access Zones, Moving Equipment and Fatigue
- 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

Fatalities by Year GOMR



Injuries by Year GOMR



LWC by Year GOMR



Fires-Explosions by Year GOMR



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

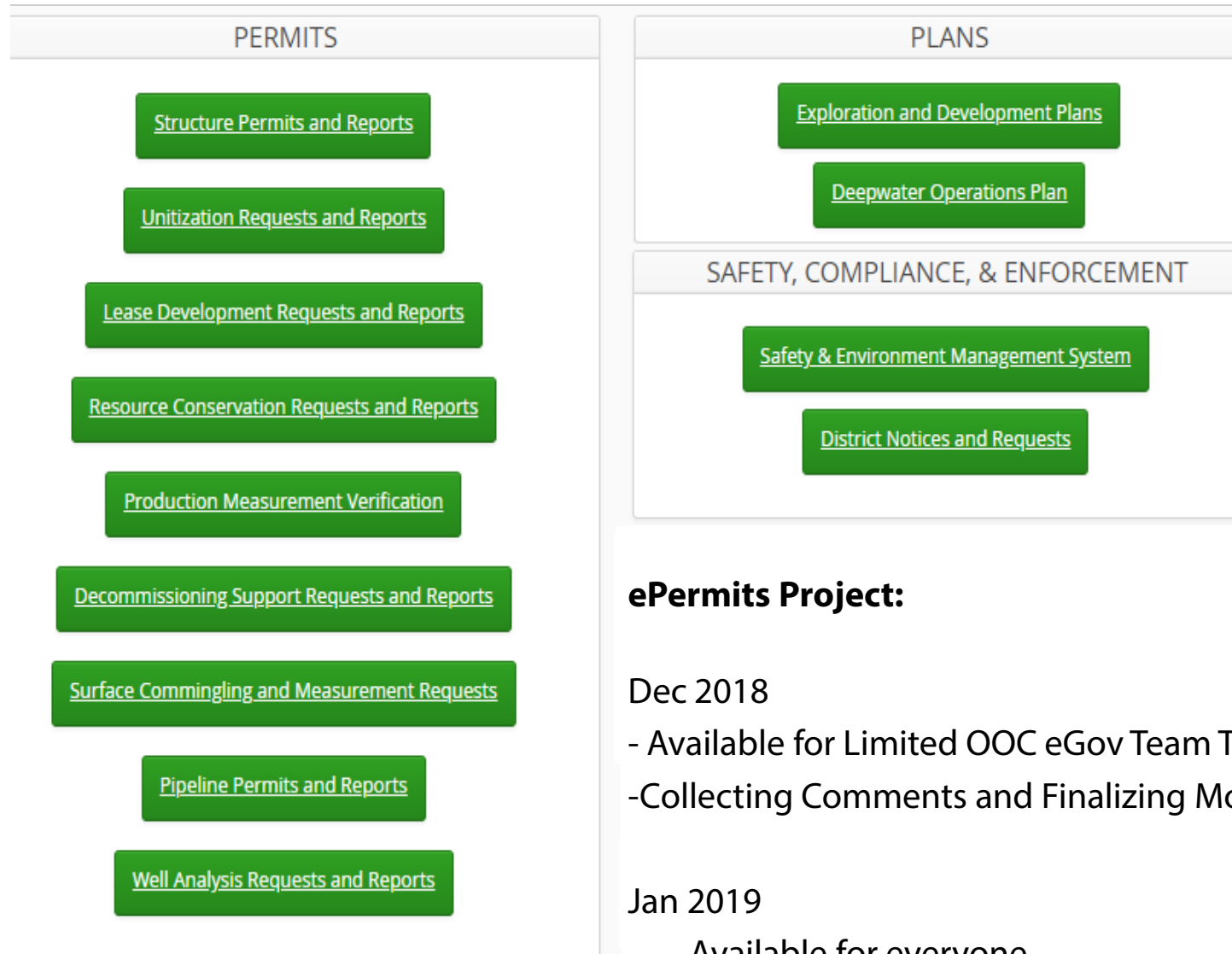
SafeOCS

- 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



ePermits Project:

Dec 2018

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

Jan 2019

- Available for everyone
- Training Provided TBA

Number of Terminated Lease and Idle Platforms Annually

Yearly Structure Data									
	<i>Added</i>	<i>Taken Off</i>	<i>Composite</i>	<i>Added</i>	<i>Taken Off</i>	<i>Composite</i>	<i>Added</i>	<i>Taken Off</i>	<i>Composite</i>
As of	Lease Term Structures			Idle Iron Structures			Structure Total		
Jan-11	-	-	297	-	-	638	-	-	935
Jan-13	223	221	299	71	324	385	294	545	684
Jan-14	49	125	223	35	79	341	84	204	564
Jan-15	190	102	311	39	109	271	229	211	582
Jan-16	115	91	335	25	52	244	140	143	579
Jan-17	129	173	291	31	51	224	160	224	515
Jan-18	68	104	255	36	21	239	104	125	494

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

BSEE Website: www.bsee.gov



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