1. OCCURRED
   DATE: 29-NOV-2006 TIME: 0830 HOURS

2. OPERATOR: Pogo Producing Company
   REPRESENTATIVE: David Day
   TELEPHONE: (832) 615-8983
   CONTRACTOR:
   REPRESENTATIVE:
   TELEPHONE:

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

4. LEASE: G02177
   AREA: SP
   LATITUDE:
   BLOCK: 49
   LONGITUDE:

5. PLATFORM: A
   RIG NAME:

6. ACTIVITY: Exploration (POE)

7. TYPE:
   [ ] Historic Injury
   [ ] Required Evacuation
   [ ] LTA (1-3 days)
   [ ] LTA (>3 days)
   [ ] RW/JT (1-3 days)
   [ ] RW/JT (>3 days)
   [ ] Other Injury

   [ ] Fatality
   [ ] Pollution
   [ ] Fire
   [ ] Explosion
   [ ] Historic Blowout
   [ ] Underground
   [ ] Surface
   [ ] Deverter
   [ ] Surface Equipment Failure or Procedures

   Collision
   [ ] Historic
   [ ] >$25K
   [ ] <=$25K

8. CAUSE:
   [ ] Equipment Failure
   [ ] Human Error
   [ ] External Damage
   [ ] Slip/Trip/Fall
   [ ] Weather Related
   [ ] Leak
   [ ] Upset H2O Treating
   [ ] Overboard Drilling Fluid
   [ ] Other

9. WATER DEPTH: 300 FT.

10. DISTANCE FROM SHORE: 10 MI.

11. WIND DIRECTION: SSW
    SPEED: 12 M.P.H.

12. CURRENT DIRECTION: N
    SPEED: 7 M.P.H.

13. SEA STATE: FT.
17. DESCRIBE IN SEQUENCE HOW ACCIDENT HAPPENED:

A. On the morning of 11-18-2006, the Operator was making a round on the SP 49-A platform about 07:00, a slick was discovered coming off the platform 150 ft wide and 2600 ft long by operations. Dull in color. An upset in the chem electric carried over to the Wemco Unit overflowing to the Gulf. The operator shut in the platform and proceeded to clean up the systems.

B. 11/21/2006 - There was an upset in the LPS causing a pollution incident off the Wemco Unit. On the evening of the incident the operators were trying to pig the Stone Energy, MC 109A pipeline. They had a manual valve cracked open to the vent system off the pig trap. When the Wemco Unit high leveled, the operators went to it and left the manual valve on the pig trap open and unattended. It was at this time a slug of oil from the MC 109 Pipeline hit the pig trap and flooded the vent system with oil causing oil to blow out the flare boom. Oil covered the entire platform and was left that way until 11/29/2006.

C. 11/29/2006 - There was a third pollution event discovered by New Orleans District during a routine inspection flight offshore. An inspector discovered a slick 1/4 of a mile wide by 16 miles long trailing off SP 49A platform. When the inspector landed and found the Lead Operator, they were still on line and trying to pump the oil out of the Wemco Unit straight to the Production Sump. At this point the inspector instructed the Lead to shut in the facility by ESD and was going to time the shut down. After activation of the ESD system the platform did not shut in. It was discovered that the ESD system was in by pass along with all pipelines and most of the components on the platform. They took the ESD system out of by pass and the facility did shut in at that point. By passed devices and systems were not flagged nor were they being monitored. The best answer the inspector could get at the time from the lead operator was he did not know when or who had put the devices in by passed.

D. 12-10-2006 - There was a fourth pollution event. As the operators were trying to bring the platform back on line, the vent scrubber High Leveled and filled the flare boom up with oil then it was release out the flare boom.

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

   a. Not properly trained for the facility
   b. Lack of supervision
   c. Unsafe work practices
   d. Operators being fatigued

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

   a. Not being properly trained for the facility
   b. Lack of supervision
   c. Unsafe work practices
   d. Fatigue factor for personal
21. PROPERTY DAMAGED: None
   NATURE OF DAMAGE: None

ESTIMATED AMOUNT (TOTAL): $

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:
   a. Have Sub part 0 audit done by Safety Management Group with emphasis on training
      operators on the facility they are to operate.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: NO

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:
   a. E-100 30 CFR 250.300 (a) issued on 11-21- 2006

The following INCs were written on 11-29-2006
a. E-100 30 CFR 250.300 (a) 16 MILE POLLUTION EVENT
b. P-103 30 CFR 250.803(C) (1) ESD SYSTEM BEING BY PASSED
c. P-103 30 CFR 250.803(C) (1) KAH 6678 GAS SALES P/L BY PASSED
d. P-103 30 CFR 250.803(C) (1) MBD 1000 IP SEP BY PASSED
e. P-103 30 CFR 250.803(C) (1) WEMCO LSH/L BY PASSED
f. P-103 30 CFR 250.803(C) (1) KAQ 6029 P/L BY PASSED
g. P-103 30 CFR 250.803(C) (1)KAQ 6848 P/L BY PASSED
h. P-103 30 CFR 250.803(C) (1)KAQ 6951 TGP P/L BY PASSED
i. P-103 30 CFR 250.803(C) (1) MBD 1003 LP SEP BY PASSED
j. G-112 30 CFR 250.107 OIL ACCUMULATIOS ON THR DECKS
   k. P-103 30 CFR 250.803(C) (1) KAH 5625 OIL SALES P/L BY PASSED

25. DATE OF ONSITE INVESTIGATION:
   29-NOV-2006

26. ONSITE TEAM MEMBERS:
   Justin Josey / Phil McLean /

29. ACCIDENT INVESTIGATION
   PANEL FORMED: NO
   OCS REPORT:

30. DISTRICT SUPERVISOR:
   Troy Trosclair

   APPROVED
   DATE: 27-FEB-2007
1. VOLUME: GAL 4.8 BBL

29920 YARDS LONG X 1320 YARDS WIDE

APPEARANCE:

2. TYPE OF HYDROCARBON RELEASED: [X] OIL
   [ ] DIESEL
   [ ] CONDENSATE
   [ ] HYDRAULIC
   [ ] NATURAL GAS
   [ ] OTHER

3. SOURCE OF HYDROCARBON RELEASED: Wemco Unit

4. WERE SAMPLES TAKEN? NO

5. WAS CLEANUP EQUIPMENT ACTIVATED? NO
   IF SO, TYPE: [ ] SKIMMER
   [ ] CONTAINMENT BOOM
   [ ] ABSORPTION EQUIPMENT
   [ ] DISPERSONS
   [ ] OTHER

6. ESTIMATED RECOVERY: GAL BBL

7. RESPONSE TIME: HOURS

8. IS THE POLLUTION IN THE PROXIMITY OF AN ENVIRONMENTALLY SENSITIVE AREA (CLASS I)? NO

9. HAS REGION OIL SPILL TASK FORCE BEEN NOTIFIED? NO

10. CONTACTED SHORE: NO IF YES, WHERE:

11. WERE ANY LIVE ANIMALS OBSERVED NEAR: NO

12. WERE ANY OILED OR DEAD ANIMALS OBSERVED NEAR SPILL: NO