UNITED STATES DEPARTMENT OF THE INTERIOR
MINERALS MANAGEMENT SERVICE
GULF OF MEXICO REGION

ACCIDENT INVESTIGATION REPORT

1. OCCURRED
   DATE: 25- OCT-2009  TIME: 1830  HOURS

2. OPERATOR: Shell Offshore Inc.
   REPRESENTATIVE: Bill Terrebonne
   TELEPHONE: (504) 728-6237
   CONTRACTOR: NOBLE DRILLING (U.S.) INC.
   REPRESENTATIVE: Brown, Daniel
   TELEPHONE: (281) 276-6443

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

4. LEASE: G12166
   AREA: MC
   LATITUDE: 28.18457819
   BLOCK: 765
   LONGITUDE: -89.13206539

5. PLATFORM
   RIG NAME: NOBLE JIM THOMPSON

6. ACTIVITY:
   □ EXPLORATION (POE)
   □ DEVELOPMENT/PRODUCT ON (DOCD/POD)

7. TYPE:
   □ HI STORI C 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
   □ HI STORI C BLOWOUT
   □ UNDERGROUND
   □ Surface
   □ DEVERTER
   □ SURFACE EQUIPMENT FAULURE OR PROCEDURES
   □ COLLISION
   □ HI STORI C
   □ >$25K
   □ <$25K

8. CAUSE:
   □ EQUIPMENT FAULURE
   □ HUMAN ERROR
   □ EXTERNAL FAULURE
   □ SLIP/TRY/FALL
   □ WEATHER RELATED
   □ LEAK
   □ UPSET H2O TREATING
   □ OVERBOARD DRI LLI NG FLUID
   □ OTHER

9. WATER DEPTH: 3544 FT.

10. DISTANCE FROM SHORE: 79 MI.

11. WIND DIRECTION:
    □ LEFT
    □ RIGHT
    □ NO WIND
    □ HISTORIC BLOWOUT SPEED: M.P.H.
    □ CURRENT BLOWOUT SPEED: M.P.H.

12. CURRENT DIRECTION:
    □ LEFT
    □ RIGHT
    □ NO CURRENT
    □ HISTORIC BLOWOUT SPEED: M.P.H.
    □ CURRENT BLOWOUT SPEED: M.P.H.

13. SEA STATE: 4 FT.
17. INVESTIGATION FINDINGS:

On 25 October 2009, at approximately 1830 hours, 314 bbls of Accolade Base Fluid (Accolade), a synthetic base mud additive, was discharged overboard. A pontoon hand inadvertently pumped out the MPP-02 tank containing the Accolade when he assumed it was seawater. The pontoon hand discharged the contents into Gulf waters without reading the rig logs or verifying the contents of the tank. The Pontoon hand was notified five hours later that the Accolade and not seawater was in tank MPP-02. At the time of the incident, the rig was in the process of pulling anchors to move off location.

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

The pontoon hand did not read the rig log of 19 October 2009 which states that the fluid was transferred to tank MPP-02, but instead assumed that seawater was in the tank.

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

1. No testing of the tank(s) fluids were performed prior to the discharge operation.
2. No signs were installed on the tank(s) to indicate their contents.

20. LIST THE ADDITIONAL INFORMATION:

21. PROPERTY DAMAGED: NATURE OF DAMAGE:
314 bbls of Accolade Base Fluid Discharged overboard.

Estimated Amount (Total): $105,240

22. Recommendations to Prevent Recurrence Narrative:
The MMS New Orleans District makes no recommendations to the MMS Regional Office of Safety Management (OSM).

23. Possible OCS Violations Related to Accident: YES

24. Specify Violations Directly or Indirectly Contributing Narrative:
Notification of Incidents of Noncompliance (INC) E-100 issued.
National Pollutant Discharge Elimination System (NPDES) violation.

25. Date of Onsite Investigation:
02-Nov-2009

26. Onsite Team Members:
James Webb / Peter Botros / Darryl Williams / Tom Meyer /
Panel Formed: NO

29. Accident Investigation:
OCS Report:

30. District Supervisor:
Trocquet, David
Approved
Date: 02-Apr-2010
1. VOLUME: GAL  314  BBL

YARDS LONG X  YARDS WIDE

APPEARANCE:

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

3. SOURCE OF HYDROCARBON RELEASED:  Discharged overboard through the shunt line.

4. WERE SAMPLES TAKEN?  NO

5. WAS CLEANUP EQUIPMENT ACTIVATED?  NO

   IF SO, TYPE:  
   - [ ] SKIMMER
   - [ ] CONTAINMENT BOOM
   - [ ] ABSORPTION EQUIPMENT
   - [ ] DISPERSANTS
   - [ ] 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