

**UNITED STATES DEPARTMENT OF THE INTERIOR**  
**MINERALS MANAGEMENT SERVICE**  
**GULF OF MEXICO REGION**  
**ACCIDENT INVESTIGATION REPORT**

1. OCCURRED  
 DATE: **05-SEP-2006** TIME: **0900** HOURS

2. OPERATOR: **Freeport-McMoRan Inc.**  
 REPRESENTATIVE: **Julie Bowen**  
 TELEPHONE: **(504) 582-4535**  
 CONTRACTOR:  
 REPRESENTATIVE:  
 TELEPHONE:

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

4. LEASE: **G12362**  
 AREA: **MP** LATITUDE:  
 BLOCK: **299** LONGITUDE:

5. PLATFORM: **FP**  
 RIG NAME:

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

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

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

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

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

6. OPERATION:

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

8. CAUSE:

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

9. WATER DEPTH: **205** FT.

10. DISTANCE FROM SHORE: **15** MI.

11. WIND DIRECTION: **W**  
 SPEED: **10** M.P.H.

12. CURRENT DIRECTION: **SE**  
 SPEED: **3** M.P.H.

13. SEA STATE: **3** FT.

17. DESCRIBE IN SEQUENCE HOW ACCIDENT HAPPENED:

This investigation report is for the pollution events of 49.5 and 74.0 gallons of oil that occurred on September 5/6, 2006 on MP 299 "FP" Platform.

A third party engineering firm was engaged to inspect equipment and determine the cause of spills. The inspection revealed several related operational problems with the Skim Pile and other upstream production equipment and control devices.

- 1) The Skim Pile Level Safety High (LSH) controller did not operate properly. It functioned when manually testing, but did not operate properly when using liquids in operational mode.
- 2) The Skim Pile Level Alarm High (LAH) bridle automatically turns on the Skim Pile pump and functioned when manually operated, but malfunctioned when tested with liquids in operational mode.
- 3) Discovered the Flow Safety Valve (FSV) on the Skim Pile pump discharge did not hold; the Skim Pile pump discharge line ties into the Sour Water and Rain Water sump pumps' discharge line to the wet oil tank. When the sump pumps operated, water would back flow through the FSV to the Skim Pile.
- 4) When operators manually pumped out the Skim Pile, they got a false indication that there was no oil left in the Skim Pile.
- 5) The Acid Gas Deluge tower Level Safety High (LSH) bridle had plugged with iron sulfide and a hole in the float did not allow the LSH to activate and shut the system down. Water, along with oil buildup from the tower, carried over to the Low Pressure (LP) Vent Scrubber. The drain was plugged on the LP Vent Scrubber, causing the water to dump to the Skim Pile.
- 6) Other upstream vessels, controls, sight glasses and piping were investigated and outlined in the attached report.

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

Multiple operational problems caused an excess of oil to build up in the Skim Pile over time. A large amount of water flowed to the Skim Pile as a result of other operational issues and heavy rain fall which forced some hydrocarbons out of the Skim Pile through the water leg discharge overboard line.

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

Continued from Item 22.

- 10) Pumped down/checked Skim Pile to make sure it is free of oil. Instituted a program to check Skim Pile oil level more frequently.
- 11) Cleaned LP Vent scrubber discharge lines and installed skillet on discharge to skim pile. The L.P. Vent Scrubber was opened and visually inspected. The liquid outlet line to the Sour Water Sump was plugged. The debris was removed and the vessel closed.
- 12) Cleaned Acid Gas Deluge Tower LSH bridle of iron sulfide, then eventually replaced with new bridle because a hole was found in the float.
- 13) Operators test bridles for obstructions and function test weekly. This replaces original monthly testing schedule.
- 14) Replaced a drain valve on the sour water sump drain line to Skim Pile.
- 15) Placed security seals on manual drain valves from sour water and rain water sumps and established an inspection and repair log book.
- 16) Replaced Skim Pile LSH and LAH controllers.
- 17) Sandblasted and painted interconnecting piping and Skim Pile.
- 18) Raised the internal operating level in Skim Pile.
- 19) Pulled suction line out of Skim Pile and cleaned obstruction in line.
- 20) Replaced FSV on discharge of Skim Pile pumps.

21. PROPERTY DAMAGED:  
123.5 Gallons of Oil.

NATURE OF DAMAGE:  
Lost overboard.

ESTIMATED AMOUNT (TOTAL): \$205

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

No Recommendations to MMS.

The New Orleans District concurred with the operator's recommendations to prevent recurrence.

- 1) The Skim Pile was cleaned and internally inspected.
- 2) Replaced flex hoses with hard piping on the discharge of the skim pile pumps.
- 3) Installed a stinger pipe 6" below the water surface in the top of the goose neck gravity discharge of the skim pile to allow pumping out liquids in the goose neck.
- 4) Replaced skillets with blind flanges on the wet oil tank overflow and the low pressure vent scrubber carry-over line. This removes any possibility of liquids being carried over from these vessels to the skim pile.
- 5) Checked and cleaned oil and sediment from platform drip pans.
- 6) Cleaned all drain lines to remove any obstructions or oil accumulations.
- 7) Cleaned out the sour water and rain water sumps to remove sediments (primarily sand) and inspect. Confirmed internal levels set for proper operation.
- 8) Changed valves on sour water and rain water sumps.
- 9) Checked and flushed bridles and cleaned sight glasses on rain water, sour water sumps and dry and wet oil tanks to ensure valves were open and functioning to sight glasses. Confirmed indicated levels are accurate.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: NO

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

G-112 Excessive oil in various skids throughout platform.  
G-100 Operator did not prevent oil from polluting Gulf waters.  
G-115 ABM-103 - Surge tank on line with out approval.

25. DATE OF ONSITE INVESTIGATION:

07-SEP-2006

26. ONSITE TEAM MEMBERS:

Eric Neal / Steve Dessauer /

29. ACCIDENT INVESTIGATION

PANEL FORMED: NO

OCS REPORT:

30. DISTRICT SUPERVISOR:

Troy Trosclair

APPROVED

DATE: 20-NOV-2006

# POLLUTION ATTACHMENT

1. VOLUME: GAL **2.94** BBL  
YARDS LONG X YARDS WIDE

APPEARANCE:

2. TYPE OF HYDROCARBON RELEASED:  OIL  
 DIESEL  
 CONDENSATE  
 HYDRAULIC  
 NATURAL GAS  
 OTHER \_\_\_\_\_

3. SOURCE OF HYDROCARBON RELEASED: **0**

4. WERE SAMPLES TAKEN? **NO**

5. WAS CLEANUP EQUIPMENT ACTIVATED? **NO**

IF SO, TYPE:  SKIMMER  
 CONTAINMENT BOOM  
 ABSORPTION EQUIPMENT  
 DISPERSANTS  
 OTHER \_\_\_\_\_

6. ESTIMATED RECOVERY: **0** 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**