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

1. OCCURRED
   DATE: 21-MAR-2008  TIME: 1105 HOURS

2. OPERATOR: Shell Offshore Inc.
   REPRESENTATIVE: DiCarlo, Theresa
   TELEPHONE: (504) 728-6237
   CONTRACTOR: 
   REPRESENTATIVE: 
   TELEPHONE: 

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

4. LEASE:
   AREA: WD  LATITUDE: 
   BLOCK: 143  LONGITUDE: 

5. PLATFORM: A-PROCESS
   RIG NAME: 

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

7. TYPE:
   ☐ HISTORIC INJURY
   ☑ REQUIRED EVACUATION 1
     LTA (1-3 days)
     LTA (>3 days)
   ☑ RW/JT (1-3 days)
   ☑ RW/JT (>3 days)
   ☑ Other Injury
   ☐ FATALITY
   ☑ POLLUTION
   ☐ FIRE
   ☑ EXPLOSION

8. CAUSE:
   ☑ EQUIPMENT FAILURE
   ☑ HUMAN ERROR
   ☑ EXTERNAL DAMAGE
   ☑ SLIP/TRIP/FALL
   ☑ WEATHER RELATED
   ☑ LEAK
   ☑ UPSET H2O TREATING
   ☑ OVERBOARD DRILLING FLUID
   ☐ OTHER

9. WATER DEPTH: 369 FT.

10. DISTANCE FROM SHORE: 18 MI.

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

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

13. SEA STATE: FT.
On March 21, 2008, at 1105 hours, on Shell Offshore Inc.'s, Right of Way (ROW) OCS-G 15988, West Delta (WD) Block 143 A-Process Platform, Complex No. 23846, an employee was injured while investigating a glycol leak. The Injured Person (IP) observed glycol leaking from a 1" line approximately 8' above the deck. The IP used a step ladder to access the area and began removing insulation to expose the leak. At that point, a 1" valve on the leaking glycol line came free exposing the IP to the hot glycol. The IP jumped off of the ladder, in an attempt to escape the hot glycol and suffered a broken ankle and 1st and 2nd degree burns to his upper body. The operator did not isolate or shut-in and bleed down the unit before investigating the leak. The IP was not wearing the proper Personal Protective Equipment (PPE) when exposing hot surfaces to avoid burns. As a result of the incident, 70 bbls of monoethylene glycol (MEG) was spilled into the Gulf of Mexico. The Glycol Regeneration Unit (GRU) was shut down and barricaded. The valve was sent to Shell's Westhollow Research Center for analysis. Initial findings suggest corrosion due to high pH from caustics introduced into the system.

An onsite accident investigation on March 25, 2008, resulted in an issuance of two "After the Fact" Incidents of Noncompliance (INCs).

G-111 - Failure to maintain equipment in a safe condition. There was external corrosion on the MEG system and internal corrosion on the galvanized nipple installed on heat exchanger HAP-513.

E-100 - Failure to prevent pollution of offshore waters. 70 bbls of MEG discharged overboard.

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

External corrosion on MEG system and internal corrosion on galvanized nipple. Failure to shut-in and bleed down equipment.

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

The nipple that failed was galvanized steel not carbon. High amounts of caustic probably contributed to the corrosion of the nipple. Galvanized steel is more prone to corrosion.

20. LIST THE ADDITIONAL INFORMATION:
21. PROPERTY DAMAGED: None
   NATURE OF DAMAGE: None

ESTIMATED AMOUNT (TOTAL): $

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:
The New Orleans District makes no recommendations to MMS.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: YES

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:
   G-111 - Failure to maintain equipment in a safe condition. There was external
corrosion on the MEG system and internal corrosion on the galvanized nipple
installed on heat exchanger HAP-513.
   E-100 - Failure to prevent pollution of offshore waters. 70 bbls of MEG discharged
overboard.

25. DATE OF ONSITE INVESTIGATION:

26. ONSITE TEAM MEMBERS:

29. ACCIDENT INVESTIGATION
   PANEL FORMED: NO
   OCS REPORT:

30. DISTRICT SUPERVISOR:
   Troy Trosclair
   APPROVED
   DATE: 09-MAY-2008
1. VOLUME: GAL 70 BBL

YARDS LONG X YARDS WIDE

APPEARANCE:

2. TYPE OF HYDROCARBON RELEASED: [ ] OIL
   [ ] DIESEL
   [ ] CONDENSATE
   [ ] HYDRAULIC
   [ ] NATURAL GAS
   [X] OTHER Monoethylene Glycol (MEG)

3. SOURCE OF HYDROCARBON RELEASED: Glycol Unit

4. WERE SAMPLES TAKEN? NO

5. WAS CLEANUP EQUIPMENT ACTIVATED? NO

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