

**NATIONAL OFFICE  
POTENTIAL INCIDENT  
OF NONCOMPLIANCE  
(PINC) LIST**

## LAST UPDATE September 2016

### PREFACE

The Offshore Safety Improvement Branch of the Office of Offshore Regulatory Programs wishes to extend our appreciation to all participating BSEE and BOEM personnel for their dedicated effort and expertise in developing this edition of the National Office PINC List.

**PINC NUMBER:** A unique identifier for the specific requirement.

**PINC STATEMENT:** The clear and concise description of the requirement.

**AUTHORITY:** The regulatory authority as found in the Code of Federal Regulations.

**ENFORCEMENT ACTION:** This is the enforcement action(s) that must be taken by BSEE for an identified violation(s) of the regulations. Enforcement action(s) may result in a complete facility shut-in (**S**), a component shut-in (**C**), or a warning (**W**). A substantial number of the Potential Incidents of Noncompliance (PINCs) provide enforcement actions in all three enforcement categories [W/C; W/C/S]. Multiple enforcement action(s) [W/C; W/C/S] may be issued to document severity of identified violations. When multiple enforcement actions [W/C or W/C/S] are provided in the PINC, the criteria for each level of enforcement action are provided in the “IF NONCOMPLIANCE EXISTS” section of the PINC.

**RATIONALE/NOTE:** Additional information describing the basis or providing background information pertinent to the requirement stated in the “PINC Statement” block.

**DEFINITION:** Definitions of terms used in the PINC.

**INSPECTION PROCEDURE:** Preferred detailed guidelines to be used by BSEE personnel to ensure that the stated requirement is met. **However, the guidelines in this document are to be considered the preferable method of implementing the enforcement of each PINC and not intended as a directive or to supersede the regulatory language in the Code of Federal Regulations.**

**INSPECTION COUNT:** Describes the number of items checked to be entered on the inspection form. An incident of noncompliance (INC) must be issued to document any negative (no) answer to a PINC statement.

Examples:

**1. Enter one item checked per facility inspected.**

One (1) is entered in the “# CK” column on the inspection form and answered one [1] in the “#Y” or “#N”.

**2. Enter one item checked for each safety device inspected.**

A total count of the number of safety devices, components, wells, etc., is entered in the “#CK” column on the inspection form. The total entries in the “#Y”, “#N”, and “#N/A” columns must correspond to the total count in the “#CK” column.

**IF NONCOMPLIANCE EXISTS:** Describes the specific enforcement action to be taken for each identified violation and the severity level of each violation of the regulations. Examples:

1. Issue a warning (**W**) incident of noncompliance when the situation poses no immediate danger to personnel or equipment.
2. Issue a component (**C**) incident of noncompliance for a specific piece of equipment or location when it is determined to be part of an unsafe situation or it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.
3. Issue a structure (**S**) incident of noncompliance when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

**INCIDENT(S) OF NONCOMPLIANCE TO BE ISSUED/INC COUNT:** Dictates the specific number of incident(s) of noncompliance to be issued for identified violation(s) of the regulations. Examples:

**1. Issue one incident of noncompliance for each facility inspected.**

One (1) incident of noncompliance is issued on each facility inspected with detailed bullet descriptions of the identified violations. Exception to the one incident of noncompliance per facility inspected rule is when multiple enforcement actions [W/C or W/C/S] are provided in the PINC. PINCs with multiple enforcement action(s) [W/C; W/C/S] may dictate that multiple incidents of noncompliance are issued per facility to document severity levels of violations. Such cases will result in the issuance of one incident of noncompliance for the appropriate selected enforcement action with detailed bullet descriptions of the identified violations.

**2. Issue one incident of noncompliance for each safety device inspected.**

One (1) incident of noncompliance is issued for each safety device, component, well, etc., that is determined to be in violation of the regulations.

Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC must indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC will normally be issued, since a shut-in would serve no useful purpose. However, an after-the-fact INC that may result in Civil Penalty Review (CPR) recommendation should be issued with the appropriate shut-in enforcement action.

## **ACRONYMS USED**

### **Enforcement Actions**

**W** - Warning

**C** - Component Shut-in

**S** - Facility (Platform/Rig/Operation) Shut-in

### **Other Acronyms:**

**APD** - Application for Permit to Drill (form BSEE-123)

**API** - American Petroleum Institute

**APM** - Application for Permit to Modify (form BSEE-124)

**CFR** - Code of Federal Regulations

**DOCD** - Development Operations Coordination Document

**DOI** - Department of the Interior

**EOR** - End of Operations Report

**G&G** - Geological and Geophysical

**INC** - Incident of Noncompliance

**MAOP** - Maximum Allowable Operating Pressure

**BOEM** - Bureau of Ocean Energy Management

**MODU** - Mobile Offshore Drilling Unit

**MPMS** - Manual of Petroleum Standards

**MPR** - Maximum Production Rate

**OCS** - Outer Continental Shelf

**PINC** - Potential Incident of Noncompliance

**POE** - Plan of Exploration

**ROW** - Right-of-Way

**SAC** - Safety Analysis Checklist

**SAFE** - Safety Analysis Function Evaluation

**TIMS** - Technical Information Management System

**TVD** - True Vertical Depth

# GENERAL OPERATIONS

Update Last September 2016

G-801

## ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS?

Authority: 30 CFR 250.101

Enforcement Actions: W/C/S

30 CFR 250.1710

30 CFR 250.1725(a)

### INSPECTION PROCEDURES:

Verify that operations are being conducted in accordance with the lease stipulation.

### IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more operations on a facility if the violation(s) of the stipulation(s) poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations on a facility if the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment; and operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the stipulation poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

### INSPECTION COUNT/INC COUNT:

Enter one item checked/issue one INC per lease audited.

G-802

## ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED APPLICATIONS?

Authority: 30 CFR 250.300(b)(2) – Pollution Prevention

Enforcement Actions: W/C/S

30 CFR 250.410 – Approval to Drill a Well

30 CFR 250.513 – Well Completion Operations

30 CFR 250.613 – Well Workover Operations

30 CFR 250.731 – BOP

30 CFR 250.744 – Permanently Plug a Well or Zone

30 CFR 250.842 – Production Approval of Safety Design

30 CFR 250.1202(a)(1) – Liquid Measurement

30 CFR 250.1204(a) – Gas Measurement

30 CFR 250.1725 – Platform Removal and other Facilities

**Note:** Do not issue an INC when the operator's safety devices, systems, and equipment are installed and function in accordance with an approved "IN ERROR BY THE PRODUCTION ENGINEER" SAFE chart and Flow Diagram. Approvals made in error by BSEE will be communicated to the operators by the production engineer.

### INSPECTION PROCEDURES:

1. Verify that operations are being conducted in accordance with the approved application, i.e., APDs, APMs, SAFE, and SAC charts, etc.

### IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more operations on a facility if the violation(s) of the application(s) poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the application(s) poses an immediate danger to personnel, equipment, or the environment and it can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the application poses an immediate danger to the entire facility, personnel, or the environment; and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

### INSPECTION COUNT/INC COUNT:

Enter one item checked/issue one INC per lease audited.

G-803

**ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED PLANS?**

**Authority:** 30 CFR 250.292

**Enforcement Action:** W/C/S

30 CFR 250.1008(g)

30 CFR 254.2

30 CFR 550.280

**INSPECTION PROCEDURE:**

Verify that operations are being conducted in accordance with the approved plans, e.g., POE's, DOCD's, Oil Spill Response Plans.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per plan audited.

## ARCHAEOLOGICAL

G-808

**DOES THE ARCHAEOLOGICAL REPORTS SUGGEST THAT ARCHAEOLOGICAL RESOURCES MAY BE PRESENT AND IS THE LOCATION OF THE SITE OF ANY OPERATION LOCATED SO AS TO NOT ADVERSELY AFFECT THE AREA OF THE RESOURCE?**

**Authority:** 30 CFR 250.194(c)

**Enforcement Action:** W/C/S

30 CFR 250.1010(c)

30 CFR 250.1712(f)(14)

30 CFR 250.1725(i)

30 CFR 250.1007(a)(5)

**INSPECTION PROCEDURE:**

Verify that operations are being conducted in accordance with the approved plans, e.g., EP's, DOCD's, DPP, etc.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per audit.

G-809

**DOES THE LESSEE'S DISCOVERY OF ANY ARCHAEOLOGICAL RESOURCES IN THE LEASE AREA IMMEDIATELY RESULT IN HALTING OPERATIONS AND TAKING STEPS TO PROTECT SIGNIFICANT RESOURCES AND REPORTING THE DISCOVERY TO THE REGIONAL DIRECTOR?**

**Authority:** 30 CFR 250.194(c)

**Enforcement Action:** W/C/S

30 CFR 250.1010(c)

30 CFR 250.1007(a)(5)

30 CFR 250.1712(f)(h)

30 CFR 250.1725(i)

**INSPECTION PROCEDURE:**

Verify that operations are being conducted in accordance with the approved plans, e.g., EP's, DOCD's, DPP, etc.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per audit.

## RECORDS

G-811

**IS REQUIRED PAPERWORK SUBMITTED IN THE TIME FRAME REQUIRED FOR ALL ACTIVITIES OR OPERATIONS AS SPECIFIED BY REGULATIONS?**

**Authority:** 30 CFR 250.140(a)

**Enforcement Actions:** W/C

30 CFR 250.513(a)

30 CFR 250.613(a)

30 CFR 250.613(d)

30 CFR 250.742

30 CFR 250.743

30 CFR 250.744

30 CFR 250.900 (e)

30 CFR 250.920(e)

30 CFR 250.1008

30 CFR 250.1202(c)(4)

30 CFR 250.1202(d)(5)

30 CFR 250.1202(f)(2)

30 CFR 250.1203(b)(8)

30 CFR 250.1203(b)(9)

30 CFR 250.1704

30 CFR 250.1743

30 CFR 251.4

30 CFR 251.8(2)

30 CFR 550.283

**INSPECTION PROCEDURES:**

1. Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted. Issue one component shut-in (C) INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

**INSPECTION INC COUNT:**

Issue one INC per report audited.

G-812

**HAVE ALL RECORDS BEEN KEPT FOR THE APPROPRIATE PERIOD OF TIME AFTER OPERATIONS ARE COMPLETE?**

**Authority:** 30 CFR 250.741

**Enforcement Actions:** W

**INSPECTION PROCEDURES:**

1. Records related to drilling of the well must be kept for 90 days after drilling operations are completed.

2. Casing and liner pressure tests, diverter tests, BOP tests, and real time monitoring data must be kept for 2 years after operations are completed.

3. Completion and/or workover records must be kept until the well is permanently plugged and abandoned.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if any of the required data is not maintained for the required period of time.

**INSPECTION INC COUNT:**

Issue one INC per inspection.

## PLATFORMS AND STRUCTURES

G-821

**HAVE THE PLATFORMS AND STRUCTURES BEEN DESIGNED, FABRICATED, INSTALLED, USED, INSPECTED, AND MAINTAINED TO ENSURE ITS STRUCTURAL INTEGRITY FOR SAFE CONDUCT OF DRILLING, WORKOVER, AND PRODUCTION OPERATIONS?**

**Authority:** 30 CFR 250.900(a)

**Enforcement Action:** W

30 CFR 250.900(b)

30 CFR 250.910

**Note:** Use this PINC where no other PINC for platforms and structures applies.

**INSPECTION PROCEDURE:**

Verify that the platforms and structures have been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity for safe conduct of drilling, workover, and production operations.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of a facility if the platforms and structures have not been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per platform and structure audited.

G-822

**DOES THE LESSEE COMPILE, RETAIN, AND MAKE AVAILABLE PLATFORM STRUCTURAL RECORDS FOR THE LIFE OF THE PLATFORM, INCLUDING THE RESULTS OF PLATFORM STRUCTURAL INSPECTIONS?**

**Authority: 30 CFR 250.919  
30 CFR 250.903  
30 CFR 250.912**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Review operator records to verify that the records for each platform are available.
2. Verify that the lessee maintains for the functional life of the platform the following records:
  - A. The as-built structural drawings.
  - B. The design assumptions and analyses.
  - C. A summary of the nondestructive examination records.
  - D. The inspection results from platform inspections.
3. Verify that the records for each inspection include:
  - A. The type of inspection employed (e.g., visual, magnetic particle, or ultrasonic testing).
  - B. A summary of the testing results.
  - C. What repairs, if any, were needed.
  - D. What repairs were made.
  - E. The overall structural condition of the platform.
4. Verify that the platform has been inspected at intervals required by BSEE.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of a facility if operator records:

1. Are not available.
2. Do not contain all of the required information.
3. Do not indicate that the inspections were performed at the required frequency.

**INSPECTION COUNT/INC COUNT:** Enter one item checked/ issue one INC per structure audited.

G-823

**HAS THE OPERATOR PERFORMED THE REQUIRED STRUCTURAL SURVEYS FOR THE PLATFORM AND SUBMITTED A REPORT OF THE RESULTS ANNUALLY BY NOVEMBER 1 TO THE REGIONAL SUPERVISOR?**

**Authority: 30 CFR 250.919**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Review records in TIMS and documentation submitted by operator and others to determine if the platform is in compliance with the structural survey inspection and reporting requirements.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a records audit of a facility if records indicate that the existing platform was not in compliance with the structural survey inspection and reporting requirements. *(New Office PINC proposed by Office of Structural & Technical Support.)*

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per survey audited.

## BONDING

G-831

**DOES THE LESSEE MAINTAIN THE APPROPRIATE BOND REQUIRED?**

**Authority: 30 CFR 256.52  
30 CFR 256.53  
30 CFR 256.54**

**Enforcement Action: W/S**

**INSPECTION PROCEDURE:**

1. Verify that the general bond complies with the levels of development on the lease.
2. Verify that the supplemental bond complies with BSEE requirements.
3. Verify, using Treasury Circular 570, that the Surety is capable of providing a bond for the dollar amount in question.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of bonding coverage if bonding requirements are not met.

Issue one facility shut-in (S) INC for one or more facilities on a lease if bonding requirements are not met within the time specified for correction.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per bond audited.

G-832

**IF A BOND LAPSES OR DECREASES IN VALUE DURING THE TERM OF THE REQUIRED FINANCIAL COVERAGE, HAS THE LESSEE PROVIDED ACCEPTABLE ALTERNATIVE FINANCIAL COVERAGE TO THE REGIONAL DIRECTOR?**

**Authority:** 30 CFR 256.52(e)  
30 CFR 256.55  
30 CFR 256.56  
30 CFR 256.57

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. If the value of a bond submitted as security to BSEE has decreased in value, verify the lessee has provided evidence of additional alternative financial security to the Regional Director within 6 months or such shorter period of time as the Regional Director may direct.
2. If a bond submitted as security to BSEE has lapsed during the required term of the coverage, verify that acceptable alternative financial security is promptly provided to the Regional Director.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of bonding coverage if acceptable alternative financial coverage was not provided, but has since been submitted.

Issue one facility shut-in (S) INC for one or more facilities covered by a required bond if acceptable alternative financial coverage was not provided within the specified time period to the Regional Director.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per lease audited.

G-833

**HAS THE LESSEE NOTIFIED THE REGIONAL DIRECTOR WITHIN 72 HOURS AFTER LEARNING THAT AN ACTION WAS FILED ALLEGING THAT THE LESSEE, THE SURETY, OR THE GUARANTOR PROVIDING REQUIRED FINANCIAL SECURITY ARE INSOLVENT OR BANKRUPT?**

**Authority:** 30 CFR 256.55(b)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the Regional Director was notified within 72 hours after the lessee learned an action was filed alleging that the lessee, the surety, or the guarantor are bankrupt or insolvent.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of required financial coverage if the Regional Director was not notified as required.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per lease audited.

**TRAINING**

G-841

**HAS A WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM BEEN ESTABLISHED AND IMPLEMENTED?**

**Authority:** 30 CFR 250.1503(a)

**Enforcement Action:** S

**INSPECTION PROCEDURE:**

Verify that the lessee has established and implemented a training program. **IF**

**NONCOMPLIANCE EXISTS:**

Issue one facility shut-in (S) INC for an audit of a lessee's training program if the training program for well-control and production safety duties is not established and implemented. **Note:** The one or more affected facilities of the lessee is the facility.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per training program audited.

G-842

**CAN THE LESSEE EXPLAIN ITS OVERALL WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM AND PRODUCE EVIDENCE TO SUPPORT THE EXPLANATION DURING A TRAINING SYSTEM AUDIT CONDUCTED BY BSEE OR ITS AUTHORIZED REPRESENTATIVE?**

**Authority:** 30 CFR 250.1507(a)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify during audit that the lessee can explain its overall training program and produce evidence to support the explanation.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a training system audit if the lessee cannot explain its overall training program and produce evidence to support the explanation.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per training program audited.

G-843

**DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?**

**Authority:** 30 CFR 250.1503(b)(1)  
30 CFR 250.1507(a)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

- 1.) Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices.
- 2.) Verify that procedures are being followed by reviewing employee records.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices or documentation fails to support that the procedures are being implemented.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per training plan audited.

G-844

**DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE TYPE, METHOD(S), LENGTH, FREQUENCY, AND CONTENT OF THE TRAINING FOR EMPLOYEES?**

**Authority:** 30 CFR 250.1503(b)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that lessee's training plan specifies the type, method(s), length, frequency, and content of the training for employees.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the type, method(s), length, frequency, and content of the training for employees.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per training plan audited.

G-845

**DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?**

**Authority:** 30 CFR 250.1503(b)(4)

**Enforcement Action:** W

30 CFR 250.1507(a)

**INSPECTION PROCEDURE:**

- 1.) Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis.
- 2.) Verify through records review that the procedures are being implemented.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis or documentation fails to support that the procedures are being implemented.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per training plan audited.

G-846

**DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS AND IS THERE EVIDENCE THAT THE EVALUATIONS ARE BEING CONDUCTED AS PER THE PROCEDURES?**

**Authority:** 30 CFR 250.1503(b)(2)

**Enforcement Action:** W

30 CFR 250.1507(a)

**INSPECTION PROCEDURE:**

Verify

1. Verify that lessee's training plan includes procedures for evaluating the training programs of contractors.
2. Verify through records review that evaluations are being conducted as per the procedures.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors or documentation fails to indicate that the contractor evaluations are being conducted?

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per training plan audited.

- G-847**      **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS AND IS THERE EVIDENCE THAT THE INTERNAL AUDITS ARE BEING CONDUCTED AS PER PROCEDURES?**  
**Authority: 30 CFR 250.1503(b)(6)**      **Enforcement Action: W**  
**30 CFR 250.1507(a)**  
**INSPECTION PROCEDURE:**  
Verify  
1.) Verify that lessee's training plan includes procedures for internal audits.  
2.) Verify through records review that the internal audits are being conducted as per the procedures.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits or documentation fails to indicate that the internal audits are being conducted.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training plan audited.
- G-848**      **DOES THE LESSEE PROVIDE A COPY OF ITS TRAINING PLAN WHEN REQUESTED BY BSEE REGIONAL OR DISTRICT SUPERVISOR?**  
**Authority: 30 CFR 250.1503(c)(2)**      **Enforcement Action: S**  
**INSPECTION PROCEDURE:**  
Verify that a training plan is provided when requested by BSEE Regional or District Supervisor.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one facilities shut-in (S) INC for an audit of a lessee's training program if the lessee fails to provide the training plan when requested by BSEE Regional or District Supervisor.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training plan audited.
- G-849**      **DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE METHOD(S) OF VERIFYING EMPLOYEES' UNDERSTANDING AND PERFORMANCE?**  
**Authority: 30 CFR 250.1503(b)**      **Enforcement Action: W INSPECTION**  
**PROCEDURE:**  
Verify that lessee's training plan specifies the method(s) of verifying employees' understanding and performance.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the method(s) of verifying employees' understanding and performance.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training plan audited.
- G-850**      **ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES AND IS THERE EVIDENCE INDICATING THAT THE KNOWLEDGE AND SKILLS ARE BEING VERIFIED?**  
**Authority: 30 CFR 250.1506(b)**      **Enforcement Action: W**  
**30 CFR 250.1507(a)**  
**INSPECTION PROCEDURE:**  
1.) Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.  
2.) Verify through records review that procedures are being followed.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties or documentation fails to indicate that procedures are being followed.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training program audited.
- G-851**      **DOES THE LESSEE ENSURE (EITHER THROUGH THE CONTRACTOR EVALUATION OR OTHER METHOD THAT THE CONTRACTOR'S TRAINING PROGRAM PROVIDES FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?**  
**Authority: 30 CFR 250.1506(c)**      **Enforcement Action: W**  
**INSPECTION PROCEDURE:**  
Verify that the lessee has ensured that contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if the lessee has not insured either through the contractor evaluation or other method that the contractor's training plan if contractor's training program does not provide for periodic training and verification of well-control or production safety knowledge and skills.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training program audited.

- G-852** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES AND IS THERE EVIDENCE THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL HAVE BEEN VERIFIED IN ACCORDANCE WITH THE PROCEDURES?**  
**Authority:** 30 CFR 250.1503(b)(3) **Enforcement Action:** W  
30 CFR 250.1507(a)  
**INSPECTION PROCEDURE:**
1. Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties.
  2. Verify through records review that all employees and contractor personnel have been verified in accordance with the procedures.
- IF NON COMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform well control and production safety operations, can perform their assigned duties or documentation does not indicate that the verification procedures are being followed.
- INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training program audited.
- G-853** **ARE ALTERNATIVE WELL-CONTROL AND PRODUCTION SAFETY TRAINING METHODS CONDUCTED IN ACCORDANCE WITH, AND MEET, THE OBJECTIVES OF THE TRAINING PLAN?**  
**Authority:** 30 CFR 250.1503(a) **Enforcement Action:** W  
30 CFR 250.1504
- Note:** Alternative methods may include computer-based learning, films, or their equivalent. This type of training should be reinforced by appropriate demonstrations and hands-on training.
- INSPECTION PROCEDURE:**  
Verify that alternative methods conducted are in accordance with, and meet, the objectives of the training plan.
- IF NON COMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if alternative training methods conducted are not in accordance with, and meet, the objectives of the training plan.
- INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training plan audited.
- G-854** **IS WELL-CONTROL AND PRODUCTION SAFETY TRAINING FOR EMPLOYEES PROVIDED FROM SOURCES THAT MEET THE REQUIREMENTS OF THE TRAINING PLAN?**  
**Authority:** 30 CFR 250.1503(a) **Enforcement Action:** W  
30 CFR 250.1505
- INSPECTION PROCEDURE:**  
Verify that training for employees is from sources that meet the requirements of the training plan.
- IF NON COMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if training for employees is not provided from sources that meet the requirements of the training plan.
- INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training plan audited.
- G-855** **IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?**  
**Authority:** 30 CFR 250.1506(a) **Enforcement Action:** W/C
- INSPECTION PROCEDURE:**
1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
  2. Verify through record reviews that periodic training is conducted to ensure that employees maintain understanding of and competency in, well-control or production safety practices.
- IF NON COMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.  
Issue one component shut-in (C) INC for each employee that has not received is not provided periodic training (in accordance with plan) to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.
- Note:** The employee is the component.
- INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training program audited.

- G-856** **DOES EACH EMPLOYEE OR CONTRACT PERSONNEL UNDERSTAND AND PERFORM THE ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?**  
**Authority:** 30 CFR 250.1503(a) **Enforcement Action:** W/C  
30 CFR 250.1503(b)(3) 30 CFR 250.1504  
30 CFR 250.1506(b)  
30 CFR 250.1507(c)  
30 CFR 250.1507(d)  
**INSPECTION PROCEDURE:**  
1. Verify that lessee's training plan provides a process to ensure that employees and contract personnel understand and can perform their assigned well-control or production safety duties.  
2. Verify (either through written, hands-on, or oral testing) that employees understand and can perform their assigned well-control or production safety duties.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of one or more employees/contract personnel if the training plan fails to provide a process to ensure that employees understand and can perform assigned well-control or production safety duties. Issue one component shut-in (C) INC for one or more employees/contract personnel that fail to demonstrate either through written, hands-on, or oral testing, their ability to perform the assigned well-control or production duties.  
Note: The employee/contract personnel is the component.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/issue on INC per training plan audited.
- G-857** **DOES THE LESSEE ALLOW BSEE OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN, ORAL, HANDS-ON WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?**  
**Authority:** 30 CFR 250.1507(c) **Enforcement Action:** W  
30 CFR 250.1508(a)  
**INSPECTION PROCEDURE:**  
Verify that BSEE or its authorized representative is allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if BSEE or its authorized representative is not allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per training program audited.
- G-858** **DOES THE LESSEE ALLOW BSEE OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER OR WITNESS HANDS-ON, SIMULATOR, OR OTHER TYPES OF WELL-CONTROL AND PRODUCTION SAFETY TESTING?**  
**Authority:** 30 CFR 250.1507(d) **Enforcement Action:** W  
30 CFR 250.1509(a)  
**INSPECTION PROCEDURE:**  
Verify that BSEE or its authorized representative is allowed to administer or witness testing.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if BSEE or its authorized representative is not allowed to administer or witness testing.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per audit.
- G-859** **DOES THE LESSEE PAY FOR ALL COSTS ASSOCIATED WITH WELL-CONTROL OR PRODUCTION SAFETY TESTING, EXCLUDING SALARY AND TRAVEL COSTS FOR BSEE PERSONNEL?**  
**Authority:** 30 CFR 250.1507(d) **Enforcement Action:** W 30  
30 CFR 250.1509(c)  
**INSPECTION PROCEDURE:**  
Verify that the lessee pays for all costs associated with testing, excluding salary and travel costs for BSEE personnel.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if the lessee fails to pay for all costs associated with testing, excluding salary and travel costs for BSEE personnel.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per audit.

**G-860** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR RECORD KEEPING AND DOCUMENTATION OF WELL-CONTROL AND PRODUCTION SAFETY TRAINING?** Authority: 30 CFR 250.1503(b)(5) Enforcement Action: W  
**INSPECTION PROCEDURE:**  
Verify that lessee's training plan includes procedures for record keeping and documentation.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for record keeping and documentation.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per audit.

**G-861** **DOES THE LESSEE IDENTIFY PERSONNEL BY CURRENT POSITION, YEARS OF EXPERIENCE IN PRESENT POSITION, YEARS OF TOTAL OIL FIELD EXPERIENCE, AND EMPLOYER NAME, AT THE WORKSITE OR ONSHORE LOCATION?** Authority: 30 CFR 250.1508(b) Enforcement Action: W  
30 CFR 250.1509(b)  
**INSPECTION PROCEDURE:**  
Verify that lessee records identify well-control and production safety personnel by current position, years of experience in present position, years of total oil field experience, and employer name (e.g., operator, contractor, or subcontractor name).  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program if lessee records fail to identify well control and production safety personnel by current position, years of experience in present position, years of total oil field experience, and employer name.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per audit.

**G-862** **DOES THE LESSEE PROVIDE COPIES OF TRAINING DOCUMENTATION FOR PERSONNEL INVOLVED IN WELL-CONTROL OR PRODUCTION SAFETY OPERATIONS FOR THE PAST FIVE YEARS WHEN REQUESTED BY BSEE REGIONAL OR DISTRICT MANAGER?** Authority: 30 CFR 250.1503(c)(1) Enforcement Action: W  
**INSPECTION PROCEDURE:**  
Verify that training documentation was provided when requested by BSEE Regional or District Manager.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a lessee's training program for each request if the lessee failed to provide the training documentation when requested by BSEE Regional or District Supervisor.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per audit.

## TRAINING

**G-863** **DID OPERATOR ESTABLISH MINIMUM REQUIREMENTS FOR PERSONNEL INVOLVED IN WELL CONTROL AUTHORIZED TO OPERATE CRITICAL SUBSEA BOPE EQUIPMENT?** Authority: 30 CFR 250.734(a)(11) Enforcement Actions: W  
30 CFR 250.1500  
**Note:** Verification can include Subpart O audits, test, or interview.  
**INSPECTION PROCEDURES:**  
Verify that personnel:  
1. Are trained in deep-water well control theory and practice in accordance with operator's Subpart O plan.  
2. Have a comprehensive knowledge of subsea BOP hardware and control systems.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if operator's management system does not have written procedures to ensure that personnel are knowledgeable to operate and maintain critical BOP components.  
**INSPECTION INC COUNT**  
Issue one INC per subsea BOP system inspected.



## ACCIDENT REPORTING

**G-891 HAS THE DISTRICT MANAGER BEEN NOTIFIED WITH A WRITTEN REPORT WITHIN 15 DAYS OF THE INCIDENT INVOLVING ALL: FATALITIES, INJURIES INVOLVING LOST TIME AND EVACUATION, LOSS OF WELL CONTROL, FIRES, EXPLOSIONS, H<sub>2</sub>S RELEASES AS DEFINED BY 30 CFR 250.490(1), COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS, SAFETY SYSTEM DAMAGES, GAS RELEASES THAT INITIATE EQUIPMENT OR PROCESS SHUTDOWN, ALL INCIDENTS THAT RESULT IN DAMAGES GREATER THAN \$25,000, AND ALL INCIDENTS THAT REQUIRE PERSONNEL TO MUSTER FOR EVACUATION?**

**Authority:** 30 CFR 250.187

**Enforcement Actions:** W

30 CFR 250.188

30 CFR 250.190

30 CFR 250.191

30 CFR 250.490

**INSPECTION PROCEDURES:**

1. Verify that the DM has been notified of all the above listed incidents connected with any activities on a lease.
2. Verify that all reporting requirements listed in 30 CFR 250.187, 188, 190, 191, 490 have been included and submitted to the DM in a written report within 15 days of the incident.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an incident/accident on a lease if the District Manager has not been notified by the lessee as required.

**INSPECTION INC COUNT:**

Issue one INC per incident audited.

**G-892 HAS THE DISTRICT MANAGER BEEN VERBALLY NOTIFIED COMMUNICATION IMMEDIATELY FOLLOWING INCIDENTS INVOLVING ALL: FATALITIES, INJURIES REQUIRING EVACUATION, LOSS OF WELL CONTROL, FIRES, EXPLOSIONS, H<sub>2</sub>S RELEASES AS DEFINED IN 30 CFR 250.490(1), COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS AND SAFETY SYSTEM DAMAGES CONNECTED WITH ANY OPERATIONS OR ACTIVITIES ON A LEASE, RIGHT-OF-USE AND EASEMENT, PIPELINE RIGHT-OF-WAY, OR OTHER PERMIT ISSUED BY BSEE?**

**Authority:** 30 CFR 250.187

**Enforcement Actions:** W

30 CFR 250.188

30 CFR 250.189

30 CFR 250.191

30 CFR 250.490

**INSPECTION PROCEDURES:**

1. Verify that the District Manager has been notified of all the above listed incidents connected with any activities on a lease.
2. Verify that all reporting requirements listed in 30 CFR 250.187, 188, 189, 191, 490 have been included and submitted to the District Manager via oral communication immediately following the above incident.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an incident/accident on a lease and/or OCS facility if the District Manager has not been notified by the lessee or operator as required.

**INSPECTION INC COUNT:**

Issue one INC per incident audited.

## SAND & GRAVEL

**G-900 ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS?**

**Authority:** 30 CFR 282.14

**Enforcement Action:** W/C

**INSPECTION PROCEDURE:**

Verify that projects are being conducted in accordance with the lease stipulations.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more operations on a project if the violation(s) of the stipulation(s) poses no immediate danger to personnel, equipment, or the environment. Issue one component shut-down (C) INC for an audit of one or more operations on a project if the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment; and operation(s) can be shut-down without affecting the overall safety of the project.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per lease audited.

# ENVIRONMENTAL PROTECTION

## OIL SPILL RESPONSE PLANS

E-801

**IS THE FACILITY OR PIPELINE COVERED BY AN APPROVED OIL SPILL RESPONSE PLAN OR A CERTIFICATION OF CAPABILITY TO RESPOND TO A WORST CASE DISCHARGE?**

**Authority:** 30 CFR 254.1(a)

**Enforcement Action:** S

30 CFR 254.2(a)

30 CFR 254.2(b)

### INSPECTION PROCEDURE

Verify that the facility or pipeline is covered by an **approved** Oil Spill Response Plan, or that a certification of capability to respond to a worse case discharge has been submitted to the Regional Supervisor.

### IF NON COMPLIANCE EXISTS

Issue a facility shut-in (S) INC if:

1. The facility or pipeline is not covered by an **approved** Oil Spill Response Plan, or a certification of capability to respond to a worse case discharge has not been submitted to the Regional Supervisor.

### INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility and or pipeline audited.

E-802

**HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED OF RESULTS OF AN OIL SPILL PLAN REVIEW AND/OR RECEIVED REQUIRED REVISIONS TO THE OIL SPILL RESPONSE PLAN?**

**Authority:** 30 CFR 254.2(a)

**Enforcement Action:** W/S

30 CFR 254.30(a)

30 CFR 254.30(b)

30 CFR 254.30(c)(3)

30 CFR 254.30(d)

30 CFR 254.30(e)

### INSPECTION PROCEDURE

Verify that the Oil Spill Response Plan:

1. Has been reviewed within two years from the last plan submittal date and that:
  - a. Necessary revisions were submitted to the Regional Supervisor or;
  - b. A finding of "no changes required" was submitted in writing to the Regional Supervisor.
2. Revisions have been submitted within 15 days whenever:
  - a. A change occurs which significantly reduces the response capabilities.
  - b. A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored, or transported at the facility.
  - c. A change in the name(s) or capabilities of the oil spill removal organization cited in the plan.
  - d. A significant change is made to the Area Contingency Plan(s).
3. Has been revised to include changes requested by the Regional Supervisor.

### IF NON COMPLIANCE EXISTS Issue a warning

(W) INC if:

1. The Regional Supervisor has not been notified of the biennial Oil Spill Response Plan review through either the receipt of plan revisions or correspondence stating that no changes to the plan were required.
2. Revisions to the Oil Spill Response Plan have not been submitted to the Regional Supervisor for approval within 15 days after significant changes which affect the plan have occurred.
3. Changes requested by the Regional Supervisor have not been made.

### Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance within the timeframe as specified in the Warning INC.

### INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per plan audited.

## TRAINING

E-821

### HAS THE SPILL RESPONSE OPERATING TEAM COMPLETED REQUIRED TRAINING, AND ARE RECORDS BEING MAINTAINED?

Authority: 30 CFR 254.2(a)

Enforcement Action: W/S

30 CFR 254.5(a)

30 CFR 254.40

30 CFR 254.41(a)

30 CFR 254.41(d)

30 CFR 254.42(e)

#### INSPECTION PROCEDURE

Review the training records for members of the Spill Response Operating Team listed in the Oil Spill Response Plan to verify that:

1. Team members have attended annual hands-on training, including deployment and operation of the response equipment to be used.
2. Supervisory personnel have attended annual training in directing the deployment and use of the response equipment.
3. Records are being maintained for at least two years and are located at the site designated in the plan.

#### IF NONCOMPLIANCE EXISTS Issue a warning

##### (W) INC if:

1. Members of the Spill Response Operating Team or Supervisory Personnel have not timely received the required training.
2. Training records are not being maintained as required.

##### Issue a facility shut-in (S) INC if:

A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

#### INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per plan audited.

E-822

### HAS THE SPILL MANAGEMENT TEAM COMPLETED REQUIRED TRAINING, AND ARE RECORDS BEING MAINTAINED?

Authority: 30 CFR 254.2(a)

Enforcement Action: W/S

30 CFR 254.5(a)

30 CFR 254.40

30 CFR 254.41(b)

30 CFR 254.41(c)

30 CFR 254.41(d)

30 CFR 254.42(e)

#### INSPECTION PROCEDURE

Review the training records of members of the Spill Management Team listed in the Oil Spill Response Plan to verify that:

1. Team members have attended annual training on locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment; spill reporting procedures; oil-spill trajectory analysis and predicting spill movement; any other responsibilities the spill management team may have.
2. Records are being maintained and are located at the site designated in the plan.

#### IF NONCOMPLIANCE EXISTS Issue a warning

##### (W) INC if:

1. Members of the Spill Management Team have not timely received the required training.
2. Training records are not being maintained as required.

##### Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

#### INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per training program audited.

## EXERCISES

E-831

### WAS THE REGIONAL SUPERVISOR INFORMED 30 DAYS IN ADVANCE OF THE DATE OF THE SCHEDULED THE EXERCISE?

Authority: 30 CFR 254.2(a)  
30 CFR 254.5(a)  
30 CFR 254.42(f)

Enforcement Action: W/S

#### INSPECTION PROCEDURE

Verify that the Regional Supervisor was informed at least 30 days before the date of the following scheduled exercises:

1. Annual spill management team tabletop.
2. Annual deployment exercise of response equipment identified in the plan and that is staged at onshore locations.
3. Semiannual deployment exercise of any response equipment which the Regional Supervisor requires the operator to maintain at the facility or on dedicated vessels.

#### IF NONCOMPLIANCE EXISTS Issue a warning

##### (W) INC if:

1. The Regional Supervisor was not notified at least 30 days in advance of the scheduled exercise.

##### Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

#### INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per exercise audited.

E-832

### ARE EXERCISES FOR ALL PARTS OF THE OIL SPILL RESPONSE PLAN CONDUCTED AT LEAST ONCE EVERY THREE YEARS, AND ARE RECORDS BEING MAINTAINED?

Authority: 30 CFR 254.2(a)  
30 CFR 254.5(a)  
30 CFR 254.40  
30 CFR 254.42(a)  
30 CFR 254.42(b)  
30 CFR 254.42(c)  
30 CFR 254.42(d)  
30 CFR 254.42(e)

Enforcement Action: W/S

#### INSPECTION PROCEDURE

Review records to determine if:

1. The following annual exercises were conducted.
  - a. Spill Management Team table-top.
  - b. Response equipment deployment.
  - c. Manned facility notification.
2. A semi-annual equipment deployment exercise for equipment on dedicated vessels or that required at a facility by the Regional Supervisor.
3. All parts of the entire Oil Spill Response Plan have been exercised during the triennial period.
4. Records are being maintained for at least the three-year cycle and are located at the site designated in the plan.

**Note:** Individual parts of the Oil Spill Response Plan may be exercised separately over the 3-year period.

#### IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Exercises were not conducted within required time frames.
2. All parts of the Oil Spill Response Plan were not exercised at least once every 3 years.
3. Records are not being maintained. Issue a facility

shut-in (S) INC if:

A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

#### INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per exercise audited.

E-833

**DURING AN UNANNOUNCED OIL SPILL DRILL, DID THE OPERATOR SUCCESSFULLY DEMONSTRATE THE ABILITY TO IMMEDIATELY CARRY OUT PROVISIONS OF THE APPROVED OIL SPILL RESPONSE PLAN?**

**Authority:** 30 CFR 250.132(a)  
30 CFR 250.132(b)  
30 CFR 254.2(a)  
30 CFR 254.41(a)  
30 CFR 254.41(b)  
30 CFR 254.41(c)  
30 CFR 254.41(d)  
30 CFR 254.42(g)  
30 CFR 254.42(h)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE**

While conducting an on-site unannounced oil spill drill, use performance criterion from the National Preparedness for Response Exercise Program and evaluate the actions of the members of the spill management team, spill response operating team, and qualified individual; assess knowledge of the approved Oil Spill Response Plan; and compare actions taken during the drill to those listed in the approved Oil Spill Response Plan.

**IF NONCOMPLIANCE EXISTS**

**Issue a warning (W) INC if during the exercise the operator:**

1. Did not take **immediate** action to abate, control, contain, and remove the simulated oil discharge.
2. Did not immediately carry out the provisions of the approved Oil Spill Response Plan.
3. Failed to take all appropriate actions necessary to immediately abate the source of the simulated spill and remove any spills of oil.
4. Created conditions that would have posed unreasonable risk to the public health, life, property, aquatic life, wildlife, recreation, navigation, commercial fishing, or other uses of the ocean.

**Issue a facility shut-in (S) INC if:**

1. A warning (W) INC has been previously issued; the operator has not responded to BSEE requirements to correct the area of non-compliance; or the violation posed an immediate or imminent threat to life, property, or the built or natural environments.
2. In two successive unannounced drills, a warning (W) INC was issued after evaluation of the first drill and analysis of the second drill would have resulted in issuance of a warning (W) INC.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per plan audited.

**OIL SPILL REPORTS**

E-841

**ARE OBSERVED OIL DISCHARGES REPORTED BY THE OPERATOR?**

**Authority:** 30 CFR 254.2(a)  
30 CFR 254.46(a)  
30 CFR 254.46(b)  
30 CFR 254.46(c)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE**

Verify that all oil discharges:

1. Regardless of origin or size, were immediately reported to the National Response Center.
2. Of one barrel or more, from the operator's facility or pipeline, were orally reported without delay to the Regional Supervisor and that a written report was submitted within 15 calendar days after the discharge had stopped.
3. From another offshore facility were immediately reported to the Regional Supervisor and the responsible party.

**IF NONCOMPLIANCE EXISTS**

Issue a warning (W) INC if:

1. Records indicate that an oil discharge was observed and not reported or not reported timely as required.
2. A written follow-up report for an oil spill of one barrel or more from the facility was not submitted to the Regional Supervisor within 15 days after the spillage has been stopped.
3. The operator failed to report spills of one barrel or more to the Regional Supervisor without delay. Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per facility and/or pipeline audited.

**DURING AND FOLLOWING AN OIL DISCHARGE FROM A FACILITY AND/OR PIPELINE, WERE IMMEDIATE RESPONSE ACTIONS TAKEN AND WERE THEY CONSISTENT WITH THE APPROVED OIL SPILL RESPONSE PLAN?**

**Authority:** 30 CFR 250.132(a)  
 30 CFR 250.132(b)  
 30 CFR 250.107(b)  
 30 CFR 250.300(a)(1)  
 30 CFR 254.2(a)  
 30 CFR 254.5(a)  
 30 CFR 254.5(c)  
 30 CFR 254.23(a)  
 30 CFR 254.23(b)  
 30 CFR 254.23(c)  
 30 CFR 254.23(d)  
 30 CFR 254.23(e)  
 30 CFR 254.23(f)  
 30 CFR 254.23(g)  
 30 CFR 254.40

**Enforcement Action:** W/S

**INSPECTION PROCEDURE**

After an oil discharge has occurred, review BSEE and responsible party-generated spill response reports, discuss response actions with representatives of the Federal On-Scene coordinator, obtain information from oil spill removal organizations, and obtain additional data from the responsible party and/or members of the Incident Command Team, as required. If deployed to the Incident Command Post during the response, prepare detailed observations of real-time response activities. Compare collected data to that contained in the approved Oil Spill Response Plan.

**IF NONCOMPLIANCE EXISTS**

Issue a warning (W) INC if the operator:

1. Did not take immediate action to abate, control, contain, and remove the oil discharge.
2. Did not immediately carry out the provisions of the approved Oil Spill Response Plan.
3. Failed to take all appropriate actions necessary to immediately abate the source of the spill and remove any spills of oil.
4. Created conditions that posed unreasonable risk to the public health, life, property, aquatic life, wildlife, recreation, navigation, commercial fishing, or other uses of the ocean.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued; the operator has not timely responded to BSEE requirements to correct the area of non-compliance; or the violation resulted in damage to or posed an immediate or imminent threat to life, property, or the built or natural environments.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per facility and/or pipeline audited.

## DRILLING PLAN APPROVAL

**D-801**

**HAS WRITTEN APPROVAL TO DRILL, SIDETRACK, BYPASS, OR DEEPEN A WELL BEEN RECEIVED?**

**Authority:** 30 CFR 250.410

**Enforcement Actions:** S

**INSPECTION PROCEDURES:**

Verify that approval to drill, sidetrack, or deepen a well was received from the District Supervisor.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC for an audit of a drilling operation if drilling, sidetracking, bypassing, or deepening approval has not been received.

**INSPECTION INC COUNT:**

Issue one INC per well audited.

**D-802**

**DOES THE LESSEE HAVE WRITTEN OR ORAL APPROVAL TO CHANGE PLANS, MAKE CHANGES IN MAJOR DRILLING EQUIPMENT OR PLUG BACK A WELL?**

**Authority:** 30 CFR 250.465(a)(1)

**Enforcement Actions:** S

**INSPECTION PROCEDURES:**

Verify that any changes from the approved plans have been received and approved by the District Supervisor.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC for an audit of a drilling operation if the records indicate that approval has not been received for any changes from the approved plans.

**INSPECTION INC COUNT:**

Issue one INC per well audited.

- D-803** **IS THE DISTRICT SUPERVISOR GIVEN AT LEAST 24 HOURS NOTICE BEFORE STARTING A WELL TEST?**  
**Authority:** 30 CFR 250.460(b) **Enforcement Actions:** W  
**Note:** For a well test to be conducted, it must be included in the projected plans for the test in the APD (form BSEE-0123) or in the APM (form BSEE-0124).  
**INSPECTION PROCEDURES:**  
1. Verify that the District Supervisor was notified as required.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a drilling operation if the District Supervisor was not notified as required before the start of a well test.  
**INSPECTION INC COUNT:**  
Issue one INC per well audited.
- B-800** **IS THE MOVEMENT OF ALL RIG UNITS ON AND OFF LOCATION REPORTED TO THE DISTRICT MANAGER 24 HOURS PRIOR TO THE MOVEMENT, INCLUDING THE RIG NAME, LEASE NUMBER, WELL NUMBER, AND THE EXPECTED TIME OF ARRIVAL OR DEPARTURE?**  
**Authority:** 30 CFR 250.712 **Enforcement Actions:** W  
**Note:** Rig units include MODU's, platform rigs, snubbing units, wire-line units used for non-routine operations, and coil tubing units.  
**INSPECTION PROCEDURES:**  
Verify that the Operator has properly notified the District Manager of:  
1. Arrival of a rig unit on location.  
2. Movement of a rig unit to another slot.  
3. Departure of a rig unit from the location.  
4. Warm or cold stacking of a MODU or platform rig.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the proper notification has not been given.  
**INSPECTION INC COUNT:**  
Issue one INC per inspection.
- B-805** **IF A FACILITY IS REQUIRED TO HAVE REAL TIME MONITORING CAPABILITIES, HAS A REAL TIME MONITORING PLAN BEEN DEVELOPED AND IMPLEMENTED; AND IS THE PLAN AND DATA MADE AVAILABLE TO BSEE UPON REQUEST?**  
**Authority:** 30 CFR 250.724(e) **Enforcement Actions:** S  
**Note:** This requirement takes effect April 29, 2019.  
**INSPECTION PROCEDURES:**  
Verify the real time monitoring plan includes:  
1. A description of the facilities real time monitoring capabilities (with types of data collected).  
2. A description of how the data will be transmitted onshore during operations, how it will be labeled/monitored by qualified personnel onshore, and how it will be stored onshore.  
3. A description of how BSEE will be provided access to the data, including the onshore location of the monitoring facility.  
4. The qualifications of the onshore personnel monitoring the data.  
5. The procedures and methods of communication between rig personnel and the onshore monitoring personnel.  
6. Actions to be taken if real time monitoring capabilities are lost, and a protocol for response to prolonged interruption of communications and monitoring between the offshore facility and the onshore facility, and protocol for notifying BSEE of any significant interruptions.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if any of the real time monitoring requirements are not being met.  
**INSPECTION INC COUNT:**  
Issue one INC per audit.
- B-810** **HAS THE OPERATOR UTILIZED A BSEE APPROVED VERIFICATION ORGANIZATION (BAVO) TO VERIFY ALL SHEAR TESTS, VERIFY THE BOP SYSTEM USED FOR HPHT WELLS WILL PERFORM AS DESIGNED IN THE GIVEN ENVIRONMENT, AND SUBMIT ONCE EVERY 12 MONTHS A MECHANICAL INTEGRITY ASSESSMENT (MIA) REPORT FOR ALL OPERATIONS USING A SUBSEA BOP, BOP ON A FLOATING FACILITY, OR A BOP IN A HPHT ENVIRONMENT?**  
**Authority:** 30 CFR 250.732 **Enforcement Actions:** S  
**INSPECTION PROCEDURES:**  
Verify that all requirements for BAVO's and MIA Reports have been met.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if any of the real time monitoring requirements are not being met.  
**INSPECTION INC COUNT:**  
Issue one INC per audit.

## CASING PROGRAM

**D-821** **IS CASING SET AS APPROVED?**  
**Authority:** 30 CFR 250.420 **Enforcement Actions:** W  
**INSPECTION PROCEDURES:**  
Compare permitted approved casing setting depths to onsite records of actual casing setting depths for all strings of casing set.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a well's casing setting depths if the casing was not set as approved in the permit.  
**INSPECTION INC COUNT:**  
Issue one INC per well audited.

**D-822** **IF THE CASING SETTING DEPTHS ARE MORE THAN 100 FEET TVD FROM THE APPROVED APD, HAS THE CHANGE BEEN APPROVED?**  
**Authority:** 30 CFR 250.428(b) **Enforcement Actions:** W  
**INSPECTION PROCEDURES:**  
Inspect records to verify that casings are set as approved by the District Supervisor.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a drilling operation if the casing was set deeper without approval.  
**INSPECTION INC COUNT:**  
Issue one INC per well audited.

## WELL CONTROL

**D-831** **ARE DRILLING OPERATIONS SUSPENDED WHEN THE SAFE MARGIN, AS APPROVED IN THE PERMIT, BETWEEN THE DRILLING FLUID WEIGHT IN USE AND THE EQUIVALENT DRILLING FLUID WEIGHT AT THE CASING SHOE IS NOT MAINTAINED?**  
**Authority:** 30 CFR 250.427(b) **Enforcement Actions:** W  
**INSPECTION PROCEDURES:**  
1. Inspect the records to determine if the drilling fluid weight is within a safe margin of the equivalent drilling fluid weight. A safe margin is to be approved by the District Supervisor.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for an audit of a drilling operation if records indicate the safe margin has not been maintained.  
**INSPECTION INC COUNT:**  
Issue one INC per well audited.

## RIG MOVEMENT

**B-815** **IS THE MOVEMENT OF ALL DRILLING UNITS ON AND OFF LOCATION REPORTED TO THE DISTRICT SUPERVISOR 24 HOURS PRIOR TO THE MOVEMENT, INCLUDING THE RIG NAME, LEASE NUMBER, WELL NUMBER, AND THE EXPECTED TIME OF ARRIVAL OR DEPARTURE?**  
**Authority:** 30 CFR 250.712 **Enforcement Actions:** W  
**INSPECTION PROCEDURES:**  
1. Verify that the Operator has properly notified the District Supervisor of:  
A. Arrival of the MODU on location.  
B. Movement of a platform rig to a platform.  
C. Movement of a platform rig to another slot. 4. Movement of a MODU to another slot. 5. Departure of a MODU from the location.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for a drilling unit relocation if the proper notification of the drilling unit movement has not been submitted to the District Supervisor.  
**INSPECTION INC COUNT:**  
Issue one INC per drilling unit audited.

**D-841** **IS THE MOVEMENT OF ALL DRILLING UNITS ON AND OFF LOCATION REPORTED TO THE DISTRICT SUPERVISOR 24 HOURS PRIOR TO THE MOVEMENT, INCLUDING THE RIG NAME, LEASE NUMBER, WELL NUMBER, AND THE EXPECTED TIME OF ARRIVAL OR DEPARTURE?**  
**Authority: 30 CFR 250.403(a)** **Enforcement Action: W**  
**30 CFR 250.403(b)**

**INSPECTION PROCEDURE:**

Verify that the Operator has properly notified the District Supervisor of: 1. Arrival of the MODU on location. 2. Movement of a platform rig to a platform. 3. Movement of a platform rig to another slot. 4. Movement of a MODU to another slot. 5. Departure of a MODU from the location.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a drilling unit relocation if the proper notification of the drilling unit movement has not been submitted to the District Supervisor.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per drilling unit audited.

## WELL-COMPLETIONS

**C-801** **HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT SUPERVISOR PRIOR TO CONDUCTING WELL-COMPLETION OPERATIONS?**  
**Authority: 30 CFR 250.505** **Enforcement Actions: C**  
**30 CFR 250.513(a)**

**Note:** The well is the component.

**INSPECTION PROCEDURES:**

Verify from office records that prior written approval was received from the District Supervisor.

**IF NONCOMPLIANCE EXISTS:**

Issue one component shut-in (C) INC for an audit of a well-completion operation if the operator does not have written approval to conduct well-completion operations.

**INSPECTION INC COUNT:**

Issue one INC per well audited.

## WELL-WORKOVERS

**W-801** **HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT SUPERVISOR PRIOR TO CONDUCTING NON-ROUTINE WELL-WORKOVER OPERATIONS?**  
**Authority: 30 CFR 250.601** **Enforcement Actions: S**  
**30 CFR 250.605**  
**30 CFR 250.613(a)**

**INSPECTION PROCEDURES:**

Verify from office records that prior written approval was received from the District Supervisor.

**IF NONCOMPLIANCE EXISTS:**

Issue a shut-in (S) INC for an audit of a well-workover operation if the operator does not have written approval to conduct non-routine well-workover operations.

**INSPECTION INC COUNT:**

Issue one INC per well audited.

## DECOMMISSIONING

**A-801** **IS ISOLATION OF ZONES IN OPEN HOLE ACHIEVED?**  
**Authority: 30 CFR 250.1715(a)(1)** **Enforcement Actions: W**

**INSPECTION PROCEDURES:**

Verify that cement plugs were placed to extend from a minimum of 100 feet below the bottom to 100 feet above the top of any oil, gas, or freshwater zones.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of well plugging operations if the cement plugs was not placed as required.

**INSPECTION INC COUNT:**

Issue one INC per well audited.

**A-802** **ARE ALL WELLS PERMANENTLY PLUGGED ON A LEASE WHEN THE LEASE IS TERMINATED?**  
**Authority: 30 CFR 250.1710** **Enforcement Actions: W**

**INSPECTION PROCEDURES:**

Verify that all wells on a lease are permanently plugged within one year after the lease is terminated.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if all well on the lease are not permanently plugged within one year after the lease is terminated.

**INSPECTION INC COUNT:**

Issue one INC per well inspected.

A-804

**WHEN WILL BSEE ORDER ME TO PERMANENTLY PLUG A WELL?**

**Authority: 30 CFR 250.1703(a)  
30 CFR 250.1703(b)  
30 CFR 250.1711**

**Enforcement Actions: W**

**INSPECTION PROCEDURES:**

Verify that all wells that pose a hazard to safety or the environment or that are not useful for lease operations and are not capable of oil, gas, or sulphur production in paying quantities are permanently plugged.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if wells that pose a hazard to safety or the environment or that are not useful for lease operations and are not capable of oil, gas, or sulphur production in paying quantities are permanently plugged.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per well inspected.

**PRODUCTION**

**VENTING AND FLARING**

P-801

**HAS APPROVAL BEEN RECEIVED WHEN THE OPERATOR HAS FLARED OR VENTED OIL-WELL GAS OR GAS-WELL FLASH GAS IN EXCESS OF 48 CONTINUOUS HOURS OR 144 CUMULATIVE HOURS DURING ANY MONTH WHEN EQUIPMENT FAILS TO WORK PROPERLY, DURING EQUIPMENT MAINTENANCE AND REPAIR, OR TO RELIEVE SYSTEM PRESSURES ?**

**Authority: 30 CFR 250.1160(a)(6)(i)  
30 CFR 250.1160(a)(6)(iii)  
30 CFR 250.1160(a)(7)(iii)**

**Enforcement Action: W/C**

**INSPECTION PROCEDURE:**

Review flaring or venting records to determine if continuous flaring or venting of oil-well gas or gas-well flash gas has exceeded 48 hours of cumulative flaring or venting of oil well gas has exceeded 144 hours during any calendar month without prior approval.

**Note\*\*\*** Gas well flash gas is natural gas released from condensate as a result of a decrease in pressure, an increase in temperature, or both.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of flaring or venting operations if flaring or venting has ceased but records indicate that 48 continuous hours or the 144 cumulative hours have been exceeded during a month without approval.

Issue one component shut-in (C) INC for one or more affected wells if flaring or venting is ongoing and records indicate that, in the current month, 48 continuous hours or the 144 cumulative hours have been exceeded without approval, upon instructions from the appropriate supervisor.

**Note:** The affected well is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per facility audited.

P-802

**HAS APPROVAL BEEN RECEIVED WHEN THE OPERATOR HAS FLARED OR VENTED PRIMARY GAS-WELL GAS IN EXCESS OF 2 CONTINUOUS HOURS WHEN EQUIPMENT FAILS TO WORK PROPERLY, DURING EQUIPMENT MAINTENANCE AND REPAIR, OR TO RELIEVE SYSTEM PRESSURES?**

**Authority: 30 CFR 250 1160(a)(6)(ii)  
30 CFR 250 1160(a)(7)(ii)**

**Enforcement Action: W/C**

**INSPECTION PROCEDURE:**

Review flaring or venting records to determine if continuous flaring or venting of gas-well gas has exceeded 2 hours of continuous flaring or venting without prior approval of the Regional Supervisor.

**Note\*\*\*** Gas well gas is natural gas from a gas well completion that is at or near its wellhead pressure; this does not include flash gas.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of flaring or venting operations if flaring or venting has ceased but records indicate that 2 continuous hours have been exceeded without approval.

Issue one component shut-in (C) INC for one or more affected wells if flaring or venting is ongoing and records indicate that 2 continuous hours have been exceeded without approval, upon instructions from the appropriate supervisor.

**Note:** The affected well is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per facility audited.

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**FLARE-VENT METERS/BURNING/H<sub>2</sub>S**

- P-803** **IF THE FACILITY IS REQUIRED TO HAVE FLARE/VENT MEIERS, DOES THE OPERATOR MAINTAIN RECORDS AND RECORDINGS DETAILING BEGINNING TIMES, END TIMES AND VOLUMES FOR ALL FLARING AND VENTING INCIDENTS, MEIER CALIBRATION, AND MAINTENANCE RECORDS FOR A MINIMUM OF 6 YEARS?**  
**Authority:** 30 CFR 250 1163(d) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
 Verify that operator maintain records and recording detailing beginning times, end times and volumes for all flaring and venting incidents, meter calibration records for a minimum of 6 years.  
**IF NONCOMPLIANCE EXISTS:**  
 Issue a warning (W) INC for records if:  
 1. Operator has not maintained flare/vent meter records for a minimum of 6 years.  
 2. Flare/vent meter records do not include all information addressed above.  
**INSPECTION COUNT/INC COUNT:**  
 Enter one item checked/issue one INC per facility inspected.
- P-804** **HAS THE OPERATOR FAILED TO INSTALL A FLARE/VENT MEIER, WITHIN 120 DAYS, ON A FACILITY THAT PROCESSES MORE THAN AN AVERAGE OF 2000 BOPD IN A CALENDAR MONTH.**  
**Authority:** 30 CFR 250 1163(a) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
 Verify that operator has installed a meter if the facility processes more than an average of 2000 bopd in a calendar month.  
**IF NONCOMPLIANCE EXISTS:**  
 Issue a warning (W) INC if the facility has no flare/vent meter(s) and it has been longer than 120-days from the month in which an average of 2000 bopd was processed.  
 Issue a facility shut-in (S) INC upon instructions from the rate control supervisor.  
**INSPECTION COUNT/INC COUNT:**  
 Enter one item checked/issue one INC per facility inspected.
- P-805** **HAS THE OPERATOR BURNED LIQUID HYDRO CARBONS WITHOUT APPROVAL OF THE REGIONAL SUPERVISOR?**  
**Authority:** 30 CFR 250 1162(a) **Enforcement Action:** W/C  
**INSPECTION PROCEDURE:**  
 Review flaring, venting, and liquid hydrocarbon burning records to determine if the operator has burned liquid hydrocarbons without receiving approval from the Regional Supervisor.  
**IF NONCOMPLIANCE EXISTS:**  
 Issue a warning (W) INC if they burned liquid hydrocarbons without approval of the Regional Supervisor. Issue a component shut-in (C) INC if burning is ongoing and upon instructions from the rate control supervisor.  
**INSPECTION COUNT/INC COUNT:**  
 Enter one item checked/issue one INC per facility inspected.
- P-806** **HAS THE OPERATOR VENTED GAS CONTAINING H<sub>2</sub>S, EXCEPT FOR MINOR RELEASES DURING MAINTENANCE AND REPAIR ACTIVITIES, THAT RESULT IN VENTING BEYOND 15 MINUTES TIME WEIGHTED AVERAGE ATMOSPHERE CONCENTRATION OF H<sub>2</sub>S OF 20 PPM OR HIGHER?**  
**Authority:** 30 CFR 250.1164(a) **Enforcement Action:** W/C/S  
**INSPECTION PROCEDURE:**  
 Review venting records to determine if the operator has vented H<sub>2</sub>S without receiving approval from the Regional Supervisor, except for minor releases during maintenance and repair activities, that result in venting beyond 15 minutes time weighted average atmosphere concentration of H<sub>2</sub>S of 20 ppm or higher. **IF NONCOMPLIANCE EXISTS:**  
 Issue a warning (W) INC if the operator has vented H<sub>2</sub>S without receiving approval from the Regional Supervisor, except for minor releases during maintenance and repair activities, that result in venting beyond 15 minutes time weighted average atmosphere concentration of H<sub>2</sub>S of 20 ppm or higher. Issue a component shut-in (C) INC if ongoing.  
 Issue a structure shut-in (S) INC if ongoing and proper component to eliminate the H<sub>2</sub>S cannot be identified.  
**INSPECTION COUNT/INC COUNT:**  
 Enter one item checked/issue one INC per facility inspected.

### SUSTAINED PRESURE CASING MANAGEMENT

- P-807** **HAS THE OPERATOR SUBMITTED THE REQUIRED PAPERWORK WHEN THE RESULTS OF THE CASING DIAGNOSTICS TEST REQUIRE NOTIFICATION OF CORRECTIVE ACTION?**

**Authority: 30 CFR 250.526**

**Enforcement Actions: W**

**INSPECTION PROCEDURES:**

1. Verify that a notification of corrective action paperwork was submitted to the District Manager and a copy to the Regional Supervisor, Field Operations within 14 days and included the following information:
  - A. Lessee or Operator name;
  - B. Area name, OCS block number;
  - C. Well name and API number; and
  - D. Casing diagnostic test data.
2. Review records and documentation to determine that operator submitted within 30 days of the diagnostic test an Application for Permit to Modify or Corrective Action Plan.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if records indicate that operator did not submit the correct paperwork to BSEE for any of the items listed above after conducting their casing diagnostic test.

**INSPECTION INC COUNT:**

Issue one INC per report audited.

**P-808**

**HAS THE OPERATOR SUBMITTED A PLAN FOR CORRECTIVE ACTION TO THE RESPECTIVE DISTRICT MANAGER WITHIN 30 DAYS OF RECEIVING THE CASING PRESSURE DENIAL?**

**Authority: 30 CFR 250.529**

**Enforcement Actions: W**

**INSPECTION PROCEDURES:**

1. Review records and documentation to determine that operator
  - A. Submitted plans for corrective action within 30 days of the casing pressure request denial.
  - B. Notified the respective District Manager within 30 days after completion of the corrected action.
  - C. Submitted the casing diagnostic test data to appropriate Regional Supervisor, within 14 days of completion of the diagnostics test required under 250.522(e).

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if records indicate that operator did not submit the correct paperwork to BSEE for any of the items listed above after receiving casing pressure denial.

**INSPECTION INC COUNT:**

Issue one INC per report audited.

## **SPPE FAILURE REPORTING PROCEDURES**

**P-810**

**DID THE OPERATOR REPORT THE FAILURE OF SPPE IN ACCORDANCE WITH API SPEC 6A, SPEC 14A, AND API RP 14B?**

**Authority: 30 CFR 250.803(a)**

**Enforcement Actions: W**

**INSPECTION PROCEDURE:**

Review records and documentation to determine that operator reported failure of SPPE to manufacturer within 30 days.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if records indicate that operator did not report failure of SPPE to manufacturer within 30 days.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per failure

**P-811**

**DID THE OPERATOR CONDUCT AN INVESTIGATION AND FAILURE ANALYSIS INTO THE FAILURE OF SPPE?**

**Authority: 30 CFR 250.803(b)**

**Enforcement Actions: W**

**INSPECTION PROCEDURES:**

1. Review records and documentation to determine that operator conducted an investigation and failure analysis into the failure of SPPE within 60 days.
2. Review records and documentation to determine that operator sends a copy of any third party analysis conducted to the manufacturer.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if records indicate that operator:

1. Did not conduct an investigation and failure analysis into the failure of SPPE within 60 days.
2. Did not send a copy of any third party analysis conducted to the manufacturer.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per failure

**P-812**

**DID THE OPERATOR NOTIFY IN WRITING TO THE BSEE CHIEF OF OFFICE OF OFFSHORE REGULATORY PROGRAMS OF ANY MANUFACTURER DESIGN CHANGES, AND/OR IF THE OPERATOR MAKES CHANGES TO OPERATING OR REPAIR PROCEDURES AS A RESULT OF THE EQUIPMENT THAT FAILED?**

**Authority: 30 CFR 250.803(c)**

**Enforcement Actions: W**

**INSPECTION PROCEDURE:**

Review records and documentation to determine that operator notified BSEE in writing of any manufacturer design changes, and/or if the operator makes changes to operating or repair procedures as a result of the equipment that failed within 30 days.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if records indicate that operator did not notify BSEE in writing of any manufacturer design changes, and/or if the operator makes changes to operating or repair procedures as a result of the equipment that failed.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per failure

**PIPELINES  
INSTALLATION/RELOCATION**

**L-801**

**HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED PRIOR TO THE COMMENCEMENT OF THE INSTALLATION OR RELOCATION OF A PIPELINE?**

**Authority:** 30 CFR 250.1008(a)

**Enforcement Action:** W/C

**INSPECTION PROCEDURE:**

Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to commencing the installation or relocation of a pipeline.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a pipeline audit if the lessee or the ROW holder did not notified the Regional Supervisor at least 48 hours prior to commencing the installation or relocation of the pipeline.

Issue one component shut-in (C) INC for a pipeline audit if the installation or relocation of the pipeline is in progress and the lessee or the ROW holder has not notified the Regional Supervisor prior to the commencement of the operation.

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

**L-802**

**WAS THE PIPELINE CONSTRUCTED IN A MANNER TO MINIMIZE DEVIATION FROM THE ROW GRANTED?**

**Authority:** 30 CFR 250.1017(b)(1)

**Enforcement Action:** W/C

30 CFR 250.1017(b)(3)

**Note:** The Regional Supervisor will make the determination of whether a deviation is substantial.

**INSPECTION PROCEDURE:**

Review records in TIMSGIS and compare the as-built information submitted with the approved ROW associated pipeline segment route.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a deviation audit if the as-built information submitted indicates that the pipeline was constructed with a deviation from the ROW granted, but the deviation is determined to be not substantial.

Issue one component shut-in (C) INC for a deviation audit if the as-built information submitted indicates that the pipeline was constructed with a deviation from the ROW granted and the deviation is determined to be substantial. **Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

**L-803**

**HAS THE LESSEE OR THE ROW HOLDER SUBMITTED A COMPLETION REPORT TO THE REGIONAL SUPERVISOR AFTER COMPLETION OF ANY PIPELINE CONSTRUCTION?**

**Authority:** 30 CFR 250.1008(b)

**Enforcement Action:** W/C

**INSPECTION PROCEDURE:**

Verify that the lessee has submitted a report that conforms to the requirements of 30 CFR 250.1008(b) to the Regional Supervisor after completion of any pipeline construction.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a pipeline audit if the lessee or ROW holder did not submit a report to the Regional Supervisor within 90 calendar days after completion of a pipeline construction.

Issue one component shut-in (C) INC for a pipeline audit if the report does not conform to the requirements of 30 CFR 250.1008(b).

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

**L-804**

**IS THE PIPELINE PROPERLY MAINTAINED AND USED FOR THE PURPOSE FOR WHICH THE ROW WAS GRANTED?**

**Authority: 30 CFR 250.1014**

**Enforcement Action: W/C**

**Note:** Temporary cessation or suspension of pipeline operations shall not cause the ROW grant to expire.

**INSPECTION PROCEDURE:**

Review office file records, TIMS data, and any pertinent information received to determine if the pipeline is: 1. In operation;  
2. Properly maintained; and  
3. Used for the purpose for which the ROW was granted.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a pipeline audit if the pipeline is not used for the purpose for which the ROW was granted.

Issue one component shut-in (C) INC for a pipeline audit if the pipeline is not adequately maintained and poses an immediate danger to personnel, the environment, or a facility.

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

## TESTING

**L-811 HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED PRIOR TO A PRESSURE TEST ON A PIPELINE?**

**Authority: 30 CFR 250.1008(a)**

**Enforcement Action: W/C**

**INSPECTION PROCEDURE:**

Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to conducting a pressure test on a pipeline.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a pipeline audit if the lessee or the ROW holder did not notified the Regional Supervisor at least 48 hours prior to conducting a pressure test on a pipeline.

Issue one component shut-in (C) INC for a pipeline audit if a pressure test on the pipeline is currently being conducted and the lessee or the ROW holder has not notified the Regional Supervisor prior to commencing the operation.

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

**L-812 HAVE THE RESULTS AND CONCLUSIONS OF MEASUREMENTS OF PIPE-TO-ELECTROLYTE POTENTIAL MEASUREMENTS TAKEN ANNUALLY ON EACH DOI PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?**

**Authority: 30 CFR 250.1002(e)**

**Enforcement Action: C**

**30 CFR 250.1005(b)**

**30 CFR 250.1008(h)**

**INSPECTION PROCEDURE:**

Verify that the results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually on each DOI pipeline were submitted to the Regional Supervisor before March of each year.

**IF NONCOMPLIANCE EXISTS:**

Issue one component shut-in (C) INC for a pipeline audit if:

1. Results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually are not reported to the Regional Supervisor before March of each year.
2. Measurements of pipe-to-electrolyte potential measurements are not taken annually on a DOI pipeline.
3. Measurements of pipe-to-electrolyte potential measurements taken annually on a DOI pipeline are not analyzed.
4. After a review of the report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

**L-813 HAVE PIPELINES THAT WERE INSTALLED, RELOCATED, UPRATED, OR REACTIVATED AFTER BEING OUT OF SERVICE FOR MORE THAN 1 YEAR, BEEN HYDROSTATICALLY TESTED WITH WATER TO A STABILIZED PRESSURE OF AT LEAST 1.25 TIMES THE MAOP FOR AT LEAST 8 HOURS?**

**Authority: 30 CFR 250.1003(b)(1)**

**Enforcement Action: W/C**

**30 CFR 250.1003(b)(3) INSPECTION**

**PROCEDURE:**

1. Review the construction report to determine if a hydrostatic pressure test was performed on the pipeline for 8 hours and if the appropriate instruments (i.e., dead weight gauge, temperature recorder, and pressure recorder) were utilized.
2. Check dead weight test readings, temperature chart, and pressure chart.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a pipeline construction report audit if:

1. Any of the appropriate instruments were not utilized.

2. Collected data is not available.

Issue one component shut-in (C) INC for a pipeline construction audit if the pipeline was not tested for the required pressure and time period.

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

## OUT-OF-SERVICE REPORTING

**L-821 HAS THE LESSEE OR THE ROW HOLDER REPORTED A PIPELINE TAKEN OUT OF SERVICE TO THE REGIONAL SUPERVISOR?**  
**Authority: 30 CFR 250.1008(c)** **Enforcement Action: W**  
**INSPECTION PROCEDURE:**  
1. Verify that the lessee or the ROW holder has reported any pipeline taken out of service to the Regional Supervisor.  
2. Verify that written confirmation is provided if the period of time the pipeline is out of service is greater than 60 days.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for a pipeline audit if written confirmation is not provided when the period of time that the pipeline is out of service is greater than 60 days.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per pipeline audited.

**L-822 HAS THE LESSEE OR THE ROW HOLDER REPORTED ANY PIPELINE SAFETY EQUIPMENT TAKEN OUT OF SERVICE FOR MORE THAN 12 HOURS TO THE REGIONAL SUPERVISOR?**  
**Authority: 30 CFR 250.1000(e)(1)** **Enforcement Action: W/C**  
**30 CFR 250.1008(d)**  
**INSPECTION PROCEDURE:**  
Verify that the lessee or the ROW holder has reported any pipeline safety equipment taken out of service for more than 12 hours to the Regional Supervisor.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC if any pipeline safety equipment was taken out of service for a period of more than 12 hours and not reported to the Regional Supervisor.  
Issue one component shut-in (C) INC for a pipeline audit if the Regional Supervisor cannot determine that continued activity without pipeline safety equipment would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish and other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.  
**Note:** The pipeline is the component.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per pipeline audited.

**L-823 HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED WHEN THE PIPELINE SAFETY EQUIPMENT IS RETURNED TO SERVICE?**  
**Authority: 30 CFR 250.1008(d)** **Enforcement Action: W**  
**INSPECTION PROCEDURE:**  
Verify that the lessee or the ROW holder has reported to the Regional Supervisor when pipeline safety equipment is returned to service.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for failure to notify the Regional Supervisor when pipeline safety equipment is returned to service.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per pipeline audited.

## REPAIR

**L-831 HAS THE LESSEE OR THE ROW HOLDER NOTIFIED THE REGIONAL SUPERVISOR PRIOR TO THE REPAIR OF A PIPELINE OR AS SOON AS PRACTICABLE THEREAFTER?**  
**Authority: 30 CFR 250.1008(e)** **Enforcement Action: W**  
**INSPECTION PROCEDURE:**  
Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to the repair of a pipeline or as soon as practicable thereafter.  
**IF NONCOMPLIANCE EXISTS:**  
Issue one warning (W) INC for a pipeline repair if the Regional Supervisor was not notified prior to the repair of a pipeline or as soon as practicable thereafter.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per pipeline audited.

L-832

**HAS A DETAILED REPORT ON THE REPAIR OF A PIPELINE OR PIPELINE COMPONENT BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?**

**Authority: 30 CFR 250.1000(e)(1)  
30 CFR 250.1008(e)**

**Enforcement Action: W/C**

**INSPECTION PROCEDURE:**

1. Verify that a detailed report on the repair of a pipeline or pipeline component was submitted to the Regional Supervisor within 30 days after completion of the repairs. 2. Verify that the detailed report includes the required information.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a pipeline or pipeline component repair if a detailed report on the repair does not include:

1. Description of the repairs;
2. Results of pressure test; and
3. Date the pipeline or pipeline component was returned to service.

Issue one component shut-in (C) INC for a pipeline or pipeline component repair if:

1. A detailed report on the repair was not submitted to the Regional Supervisor within 30 days after completion of the repairs.
2. After a review of the report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

L-833

**HAS THE LESSEE SUBMITTED TO THE REGIONAL SUPERVISOR A COMPREHENSIVE WRITTEN REPORT OF ANY DOI PIPELINE FAILURE THAT HAS BEEN REQUIRED BY THE REGIONAL SUPERVISOR TO BE ANALYZED?**

**Authority: 30 CFR 250.1008(f)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify that a comprehensive written report of the analysis of any pipeline failure was submitted by the lessee or pipeline ROW holder to the Regional Supervisor when requested. **IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a pipeline failure audit if a comprehensive written report of the analysis of the pipeline failure was not submitted to the Regional Supervisor within the time frame specified.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

L-834

**HAS A PLAN OF CORRECTIVE ACTION FOR OBSERVED DETRIMENTAL ENVIRONMENTAL FACTORS AFFECTING A PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR APPROVAL?**

**Authority: 30 CFR 250.1000(e)(1)  
30 CFR 250.1008(g)**

**Enforcement Action: W/C 30**

**INSPECTION PROCEDURE:**

Verify that a plan of corrective action of observed detrimental environmental factors affecting a pipeline was submitted to the Regional Supervisor for approval within 30 days of the observation.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a corrective plan audit if a plan of corrective action for observed detrimental environmental factors affecting a pipeline was not submitted to the Regional Supervisor for approval within 30 calendar days of the observation.

Issue one component shut-in (C) INC for a corrective plan audit if:

1. A plan of corrective action was not prepared for known detrimental environmental factors that would affect a pipeline within 30 days of the observation.
2. After a review of the report, the Regional Supervisor cannot determine that proposed corrective action would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

L-835

**HAS A REPORT OF REMEDIAL ACTION TAKEN FOR DETRIMENTAL ENVIRONMENTAL FACTORS AFFECTING A PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR BY THE LESSEE OR ROW HOLDER?**

**Authority: 30 CFR 250.1000(e)(1)  
30 CFR 250.1008(g)**

**Enforcement Action: W/C 30**

**INSPECTION PROCEDURE:**

Verify that a report of remedial action taken for detrimental environmental factors affecting a pipeline has been submitted to the Regional Supervisor within 30 days after completion of the remedial action.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a remedial action report audit if the report of remedial action taken for detrimental environmental factors affecting a pipeline was not submitted by the lessee or ROW holder to the Regional Supervisor within 30 calendar days after completion of the remedial action.

Issue one component shut-in (C) INC for a remedial action report audit if, after a review of the remedial action taken report, the Regional Supervisor cannot determine that continued activity would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

**Note:** The pipeline is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.

## DECOMMISSIONING

L-841

**ARE PIPELINES OUT OF SERVICE FOR 5 YEARS, OR MORE, REMOVED IF THE PIPELINES ARE DETERMINED BY THE REGIONAL SUPERVISOR TO BE OBSTRUCTIONS?**

**Authority: 30 CFR 250.1006(b)(3)  
30 CFR 250.1752  
30 CFR 250.1754**

**Enforcement Actions: W**

**INSPECTION PROCEDURES:**

1. Verify that pipelines out of service for 5 years, or more, and that the Regional Supervisor determines constitute obstructions, are removed.
2. Verify that out-of-service pipelines that are removed are:
  - A. Pigged, unless the Regional Supervisor determines that pigging is not rational.
  - B. Flushed.
  - C. Removed in accordance with the removal procedures and schedule approved by the Regional Supervisor.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a pipeline audit if the out-of-service pipelines are not removed as required.

**INSPECTION INC COUNT:**

Issue one INC per pipeline audited

## COMPANY INFORMATION

L-851

**HAS THE ROW HOLDER KEPT THE REGIONAL SUPERVISOR INFORMED OF THE COMPANY'S OFFICE ADDRESS, AND THE NAME AND ADDRESS OF OFFICER OR AGENT AUTHORIZED TO BE SERVED WITH PROCESS?**

**Authority: 30 CFR 250.1010(d)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Review BSEE office file records to determine if the company information and the information for the officer or agent authorized to be served with process is current and correct.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for each company file audit if the information is not correct or current.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per pipeline audited.



## ENHANCED RECOVERY

**R-811 HAS THE LESSEE RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR PRIOR TO INITIATING AN ENHANCED OIL AND GAS RECOVERY PROJECT OR OTHER TYPE OF INJECTION PROJECT?**

**Authority: 30 CFR 250.1165(b)  
30 CFR 250.118**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Review record to determine if the enhanced oil and gas recovery operation or other type of injection project was approved by the Regional Supervisor prior to their initiation.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a injection audit if the enhanced oil and gas operations were initiated prior to receiving approval of the Regional Supervisor.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per lessee audited.

**R-812 HAS THE LESSEE INITIATED ENHANCED OIL AND GAS RECOVERY OPERATIONS FOR ALL RESERVOIRS WHERE THESE OPERATIONS WOULD RESULT IN AN INCREASE IN ULTIMATE RECOVERY UNDER SOUND ENGINEERING AND ECONOMIC PRINCIPLES?**

**Authority: 30 CFR 250.1165(a)  
30 CFR 250.118**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Review records in TIMS and other documentation to determine if enhanced oil and gas recovery operations were initiated in a timely manner where such operations would result in an increased ultimate recovery of oil and gas.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a production/injection audit if the audit shows that enhanced oil and gas operations were not:

1. Initiated in a timely manner.
2. Based upon sound engineering and economic principles.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per reservoir audited.

**R-813 ARE REPORTS OF THE VOLUMES OF OIL, GAS, AND OTHER SUBSTANCES INJECTED INTO, PRODUCED FROM, OR REPRODUCED FROM A RESERVOIR SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?**

**Authority: 30 CFR 250.1165(c)  
30 CFR 250.118**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Review records to determine if reports of the volumes of oil, gas, and other substances injected into, produced from, or reproduced from a reservoir are submitted to the Regional Supervisor when requested.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a records audit if the required reports were not submitted to the Regional Supervisor when requested.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per reservoir audited.

## PRODUCTION RATE

**R-821 HAS THE LESSEE CONDUCTED A WELL-FLOW POTENTIAL TEST WITHIN 30 DAYS AFTER THE DATE OF FIRST CONTINUOUS PRODUCTION ON A NEW, RECOMPLETED, OR REWORKED WELL COMPLETION?**

**Authority: 30 CFR 250.1151(a)(1)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Review records to determine if a well-flow potential test was completed within 30 days after the date of the first continuous production on a new, recompleted, or reworked well completion.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for the well test audit if the well-flow potential test was not completed within the required time frame.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per well audited.





**R-844** **HAS THE OPERATOR SUBMITTED A REVISION TO THEIR APPROVED CONSERVATION INFORMATION DOCUMENT (CID) AND RECEIVED APPROVAL OF THIS REVISION BEFORE BYPASSING A RESERVOIR REQUIRED TO BE DEVELOPED IN THE ORIGINAL CID?**  
**Authority:** 30 CFR 250.296(b) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Review well and reservoir records and approved wellbore utility charts to determine whether a reservoir required for development by an approved CID has been bypassed without prior approval of a revision to the operators' CID.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if operator did not receive an approval for revisions done to the existing CID from the Regional Supervisor before bypassing a reservoir.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/issue one INC per CID audited.

**R-845** **DID THE OPERATOR SUBMIT A CONSERVATION INFORMATION DOCUMENT (CID) AT THE SAME TIME AS THEY FIRST SUBMITTED THEIR DEVELOPMENT OPERATIONS COORDINATION DOCUMENT (DOCD) OR DEVELOPMENT PRODUCTION PLAN (DPP) FOR ANY DEVELOPMENT OF A LEASE OR LEASES LOCATED IN WATER DEPTHS GREATER THAN 400 METERS (1,312 FEET)?**  
**Authority:** 30 CFR 250.296(a) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Review of internal databases for determination of DOCD or DPP submission.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if operator did not submit a CID at the same time as a DOCD or DPP for any development of a lease or leases located in water depths greater than 400 meters (1312 feet).  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/issue one INC per CID audited.

### **BOTTOMHOLE PRESSURE SURVEYS**

**R-850** **DID THE OPERATOR CONDUCT A STATIC BOTTOMHOLE PRESSURE SURVEY WITHIN 90 DAYS AFTER THE DATE OF FIRST CONTINUOUS PRODUCTION FOR A NEW PRODUCING RESERVOIR AND SUBMIT THE RESULTS OF ALL STATIC BOTTOMHOLE PRESSURE SURVEYS ON FORM BSEE-140, BOTTOMHOLE PRESSURE SURVEY (BHP) REPORT, WITHIN 60 DAYS AFTER THE DATE OF THE SURVEY?**  
**Authority:** 30 CFR 250.1153(a)(1) **Enforcement Action:** W  
30 CFR 250.1153(c)  
**INSPECTION PROCEDURE:**  
Review internal databases to ascertain whether or not static bottomhole pressure surveys were run.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a (W) INC if the operator did not submit Form BSEE-140, bottomhole pressure survey report within 60 days after the date of the survey.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/issue one INC for each report.

**R-851** **DID THE OPERATOR CONDUCT AN ANNUAL STATIC BOTTOMHOLE PRESSURE SURVEY IN A SUFFICIENT NUMBER OF KEY WELLS TO ESTABLISH AN AVERAGE RESERVOIR PRESSURE AND SUBMIT THE RESULTS ON FORM BSEE-140, BOTTOMHOLE PRESSURE SURVEY (BHP) REPORT?**  
**Authority:** 30 CFR 250.1153(a)(2) **Enforcement Action:** W  
30 CFR 250.1153(c)  
**INSPECTION PROCEDURE:**  
Review internal databases to ascertain whether or not static bottomhole pressure surveys were submitted on an annual basis.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if operator does not submit annual Form BSEE-140, Bottomhole Pressure Survey Reports.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/issue one INC for each report.

# PRODUCTION MEASUREMENT AND SITE SECURITY

## CALIBRATION

**M-801** **IS EACH MECHANICAL DISPLACEMENT PROVER AND TANK PROVER CALIBRATED AT LEAST ONCE EVERY 5 YEARS AND A COPY OF THE CALIBRATION REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?**

**Authority:** 30 CFR 250.1202(f)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

1. Verify that each mechanical displacement prover and tank prover has been calibrated in accordance with API MPMS at least once every 5 years.
2. Verify that each calibration report has been submitted to the Regional Supervisor within 15 days after the calibration.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for the calibration verification of one or more provers if:

1. The calibration did not occur at least once every 5 years.
2. The calibration report was not submitted to the Regional Supervisor within 15 days after the calibration.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per facility audited.

**M-802** **IS EACH OPERATING ROYALTY METER PROVED MONTHLY TO DETERMINE THE METER FACTOR AND IS THE PROVING REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?**

**Authority:** 30 CFR 250.1202(d)(3)

**Enforcement Action:** W/C

30 CFR 250.1202(d)(4)

30 CFR 250.1202(d)(5)

**INSPECTION PROCEDURE:**

1. Verify that each royalty meter is proved to determine the meter factor monthly, but not to exceed 42 days, unless another proving schedule has been approved by the Regional Supervisor.
2. Verify that a copy of each royalty meter proving report is submitted to the Regional Supervisor within 15 days after the end of the month.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a proving audit of one or more royalty meters if the current provings have exceeded the approved proving schedule.

Issue one component shut-in (C) INC for a proving audit of a royalty meter if the current proving report was not submitted to the Regional Supervisor within 15 days after the end of the month.

**Note:** The royalty meter is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per meter audited.

**M-803** **IS THE RUN TICKET FOR EACH ROYALTY METER AND ROYALTY TANK COMPLETE, WAS IT PULLED WHEN REQUIRED, AND WAS IT SUBMITTED TO THE REGIONAL SUPERVISOR?**

**Authority:** 30 CFR 250.1202(c)

**Enforcement Action:** W/C

**INSPECTION PROCEDURE:**

1. Review the royalty meter or royalty tank run tickets to verify that they clearly identify all observed data, all correction factors, on/off seal numbers (royalty tanks only), and the net standard volume.
2. Verify that a run ticket was pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.
3. Verify that a copy of each run ticket is submitted to the Regional Supervisor within 15 days after the end of the month.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a run ticket audit of one or more royalty meter and royalty tank if:

1. The current run ticket does not clearly identify all observed data, all correction factors, on/off seal numbers (royalty tank only), and the net standard volume.
2. The current run ticket was not pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.

Issue one component shut-in (C) INC for a run ticket audit of a royalty meter or royalty tank if the current run ticket was not submitted to the Regional Supervisor within 15 days after the end of the month.

**Note:** The royalty meter or the royalty tank is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per meter or tank audited.

## LIQUID ROYALTY METER

**M-821 ARE LIQUID HYDROCARBON ROYALTY METERS TAKEN OUT OF SERVICE, REPAIRED OR REPLACED, AND REPROVEN IF THE DIFFERENCE BETWEEN THE METER FACTOR AND THE PREVIOUS METER FACTOR EXCEEDS 0.0025?**

**Authority:** 30 CFR 250.1202(i)(1)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

1. If a malfunction occurs:
  - A. Ensure that the meter remains out of service until the malfunction is corrected.
  - B. Ensure that the average of the malfunction factor and the previous factor is applied to the production measured through the meter between the date of the previous factor and the date of the malfunction factor.
  - C. Ensure that proving reports indicate that a malfunction occurred and show all appropriate remarks regarding subsequent repairs or adjustments.

**Note:** If A through C above is accomplished, an INC is not warranted. 2. Check proving reports for previous meter malfunctions.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a proving report audit if the proving report indicates that:

1. A previous meter malfunction occurred, the meter was taken out of service, repaired or replaced, and reprovved; but information as to production averaging and meter repair or replacement is not available.
2. If proving reports indicate that a previous meter malfunction occurred and the meter was not taken out of service, repaired or replaced, and reprovved.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per meter audited.

## GAS ROYALTY METER

**M-831 ARE GAS VOLUME AND QUALITY STATEMENT DISPOSITIONS ON GAS ROYALTY METERS SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?**

**Authority:** 30 CFR 250.1203(b)(6)

**Enforcement Action:** W/C

30 CFR 250.1203(b)(7)

30 CFR 250.1203(b)(8)

30 CFR 250.1203(b)(9)

**INSPECTION PROCEDURE:**

1. Verify that the gas volume and quality statements and additional information were submitted when requested.
2. Verify that the gas volume and quality statements clearly identify all required data.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a gas volume audit of one or more gas royalty meters if the gas volume and quality statements and additional information do not clearly identify all required data.

Issue one component shut-in (C) INC for a gas volume audit of a gas royalty meter if the requested gas volume and quality statements and additional information requested by the Regional Supervisor are not submitted within the time frame specified.

**Note:** The gas royalty meter is the component.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per meter audited.

## GEOLOGICAL AND GEOPHYSICAL EXPLORATION PERMITS

**O-801 IS REQUIRED PERMIT APPROVED OR NOTICE OF SCIENTIFIC RESEARCH FILED PRIOR TO CONDUCTING A GEOLOGICAL OR GEOPHYSICAL ACTIVITY?**

**Authority:** 30 CFR 251.1

**Enforcement Action:** S

30 CFR 251.3

30 CFR 251.4

30 CFR 251.5

30 CFR 251.10

**INSPECTION PROCEDURE:**

Verify that permit has been issued or a notice filed with BSEE prior to commencing a G&G activity.

**IF NONCOMPLIANCE EXISTS:**

Issue one facility shut-in (S) INC for a G&G activity audit if the activity is conducted without a permit or notice.

**Note:** The G&G activity is the facility.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per G&G activity audited.

O-802

**ARE GEOLOGICAL AND GEOPHYSICAL ACTIVITIES BEING CONDUCTED IN ACCORDANCE WITH REGULATIONS AND AN APPROVED PERMIT?**

**Authority:** 30 CFR 251.1

**Enforcement Action:** W/S

30 CFR 251.3  
30 CFR 251.4  
30 CFR 251.6  
30 CFR 251.7  
30 CFR 251.8  
30 CFR 251.9  
30 CFR 251.10

**INSPECTION PROCEDURE:**

Verify that G&G activities are being conducted in accordance with regulations and the approved permit.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a G&G activity audit if the G&G activity was conducted in violation of regulations and an approved permit.

Issue one facility shut-in (S) INC for a G&G activity audit if the G&G activity currently being performed is being conducted in violation of regulation and an approved permit.

**Note:** The G&G activity is the facility.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per G&G activity audited.

O-803

**IS REQUIRED PERMIT APPROVED OR NOTICE OF SCIENTIFIC RESEARCH FILED PRIOR TO PROSPECTING FOR MINERALS OTHER THAN OIL, GAS, AND SULPHUR ON THE OUTER CONTINENTAL SHELF?**

**AUTHORITY:** 30 CFR 280

**ENFORCEMENT ACTION:** S

30 CFR 280.10  
30 CFR 280.11  
30 CFR 280.12  
30 CFR 280.13

**INSPECTION PROCEDURE:**

Verify that permit has been issued or a notice filed with BSEE prior to commencing prospecting for minerals other than oil, gas, and sulphur on the Outer Continental Shelf.

**IF NONCOMPLIANCE EXISTS**

Issue one facility shut-in (S) INC for prospecting activity audit if the activity is conducted without a permit or notice.

**Note:** The prospecting activity is the facility.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per prospecting activity audited.

O-804

**ARE PROSPECTING ACTIVITIES FOR MINERALS OTHER THAN OIL, GAS, AND SULPHUR ON THE OUTER CONTINENTAL SHELF BEING CONDUCTED IN ACCORDANCE WITH REGULATIONS AND AN APPROVED PERMIT?**

**AUTHORITY:** 30 CFR 280

**ENFORCEMENT ACTION:** W/S

30 CFR 280.20  
30 CFR 280.21  
30 CFR 280.22  
30 CFR 280.23  
30 CFR 280.24  
30 CFR 280.25  
30 CFR 280.26  
30 CFR 280.27  
30 CFR 280.28  
30 CFR 280.29  
30 CFR 280.30  
30 CFR 280.31  
30 CFR 280.32  
30 CFR 280.33  
30 CFR 280.34

**INSPECTION PROCEDURE:**

Verify that Prospecting activities are being conducted in accordance with regulations and the approved permit.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a prospecting activity audit if the prospecting activity was conducted in violation of regulations and an approved permit.

Issue one facility shut-in (S) INC for a prospecting activity audit if the prospecting activity currently being performed is being conducted in violation of regulation and an approved permit.

**Note:** The prospecting activity is the facility.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/issue one INC per prospecting activity audited.

## DATA

**O-811 ARE REQUIRED GEOLOGICAL AND GEOPHYSICAL DATA AND INFORMATION SUBMITTED TO BSEE WITHIN THE TIME FRAME SPECIFIED BY REGULATION AND PERMIT?**

**Authority:** 30 CFR 251.1

**Enforcement Action:** W

30 CFR 251.10

30 CFR 251.11

30 CFR 251.12

**INSPECTION PROCEDURE:**

Verify that required data and information are submitted in the timeframe required by regulations and a G&G permit.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a G&G activity audit if the G&G data and information has not been submitted as specified by regulation and permit.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per G&G activity audited.

**O-812 ARE REQUIRED GEOLOGICAL AND GEOPHYSICAL DATA AND INFORMATION SUBMITTED TO BSEE WITHIN THE TIME FRAME SPECIFIED BY REGULATION AND PERMIT?**

**Authority:** 30 CFR 280

**Enforcement Action:** W

30 CFR 280.40

30 CFR 280.41

30 CFR 280.42

30 CFR 280.34

30 CFR 280.50

30 CFR 280.51

30 CFR 280.52

**INSPECTION PROCEDURE:**

Verify that required data and information are submitted in the timeframe required by regulations and a G&G permit.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a G&G activity audit if the G&G data and information has not been submitted as specified by regulation and permit.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per G&G activity audited