# PRODUCTION OPERATIONS

(Last Update - January 2018)

## General

### P-100

**ARE PRESSURE-RECORDER DEVICES USED TO DETERMINE THE CURRENT OPERATING PRESSURE RANGES MAINTAINED AT THE LESSEE’S NEAREST OCS FIELD OFFICE?**

**Authority:** 30 CFR 250.851(b)  
30 CFR 205.852(a)(2)  
30 CFR 250.865(b)  
30 CFR 250.858(b)  

**Enforcement Actions:** W

### P-101

**DO ALL SAFETY SHUTDOWN DEVICES, VALVES, AND PRESSURE SENSORS FUNCTION IN A MANUAL RESET MODE?**

**Authority:** 30 CFR 250.853(a)  

**Enforcement Actions:** C

### P-102

**DO END-DEVICES (I.E., SHUTDOWN DEVICES, SHUTDOWN VALVES, SSVs, AND OTHER SHUTDOWN CONTROLS) PERFORM THEIR DESIGNED FUNCTION UPON RECEIVING A SIGNAL (PNEUMATIC OR ELECTRONIC) TRANSMITTED BY A SENSOR THAT HAS DETECTED AN ABNORMAL CONDITION?**

**Authority:** 30 CFR 250.841(a)  

**Enforcement Actions:** C

### P-103

**IS EACH SURFACE OR SUBSURFACE SAFETY DEVICE, WHICH IS BYPASSED OR BLOCKED OUT OF SERVICE, OUT OF SERVICE DUE TO START-UP, TESTING, OR MAINTENANCE AND IS IT FLAGGED AND MONITORED BY PERSONNEL?**

**Authority:** 30 CFR 250.869(a)  
30 CFR 250.1004(c)  

**Enforcement Actions:** C
P-104  
IS THE PLATFORM PROTECTED WITH A BASIC AND ANCILLARY SURFACE SAFETY SYSTEM DESIGNED,  
ANALYZED, INSTALLED, TESTED, AND MAINTAINED IN OPERATING CONDITION IN ACCORDANCE WITH THE  
PROVISIONS OF API RP 14C RECOMMENDED PRACTICE FOR ANALYSIS, DESIGN, INSTALLATION, AND  
testing of BASIC SURFACE SAFETY SYSTEMS FOR OFFSHORE PRODUCTION PLATFORMS (INCORPORATED  
BY REFERENCE AS SPECIFIED IN 30 CFR 250.198).  

Authority: 30 CFR 250.841(a)  
Enforcement Actions: W/C/S

P-105  
IS EACH OPEN-ENDED LINE CONNECTED TO PRODUCING FACILITIES AND WELLS PLUGGED OR BLIND-FLANGED?  

Authority: 30 CFR 250.869(d)  
Enforcement Actions: W/C

P-106  
IS NON-METALLIC PIPING SUCH AS POLYVINYL CHLORIDE, CHLORINATED POLYVINYL CHLORIDE, AND  
REINFORCED FIBERGLASS USED ONLY ON ATMOSPHERIC AND NON-HYDROCARBON SERVICE OVERBOARD  
WATER PIPING?  

Authority: 30 CFR 250.868  
Enforcement Actions: C

P-107  
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)(i)  
30 CFR 250.1160(a)(7)(iii)  

Enforcement Actions: W/C

P-108  
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 Actions: W/C

Flaring and Venting of Gas
HAS THE OPERATOR RECEIVED APPROVAL WHEN FLARING OR VENTING GAS, BEYOND THE THRESHOLDS ALLOWED TO BURN WASTE PRODUCTS SUCH AS H2S, OR TO RESTART A FACILITY THAT WAS SHUT IN BECAUSE OF WEATHER CONDITIONS SUCH AS A HURRICANE, OR HAVE THEY REPORTED THE BLOWDOWN OF A TRANSPORTATION PIPELINE DOWNSTREAM OF THE ROYALTY METER WITHIN 72 HOURS?


Enforcement Actions: W/C

DOES THE OPERATOR HAVE APPROVAL TO FLARE OR VENT GAS BEYOND 48 CUMULATIVE HOURS PER UNLOADING OR CLEANING OR TESTING OPERATION ON A SINGLE COMPLETION?

Authority: 30 CFR 250.1160(a)(4)

Enforcement Actions: W/C

HAS THE OPERATOR VERIFIED THAT OIL-WELL GAS AND/OR GAS-WELL GAS VAPORS FLARED OR VENTED FROM STORAGE VESSELS OR OTHER LOW PRESSURE PRODUCTION VESSELS AVERAGE NO MORE THAN 50 MCF/DAY DURING A CALENDAR MONTH AND THAT THESE SMALL VOLUMES THAT CANNOT BE ECONOMICALLY RECOVERED?

Authority: 30 CFR 250.1160(a)(5)

Enforcement Actions: W/C

DOES THE OPERATOR MAINTAIN RECORDS FOR A MINIMUM OF 2 YEARS AT THE FACILITY DETAILING DAILY VOLUMES FLARED, VENTED, AND/OR LIQUID HYDROCARBONS BURNED; HOURS FLARED, VENTED, AND/OR BURNED, ON A DAILY AND MONTHLY CUMULATIVE BASIS; REASONS FOR FLARING, VENTING, AND/OR BURNING; WELLS CONTRIBUTING TO THE FLARING, VENTING, AND/OR BURNING ALONG WITH GAS-OIL RATIOS AND DOCUMENTATION OF ALL REQUIRED APPROVALS?

Authority: 30 CFR 250.1163(c)(1) 30 CFR 250.1163(c)(3)(v)

Enforcement Actions: W

FOR FACILITIES THAT PROCESS MORE THAN AN AVERAGE OF 2,000 BOPD IN A CALENDAR MONTH, HAS THE OPERATOR INSTALLED FLARE/VENT METERS WITHIN 120 DAYS AFTER THE END OF THE MONTH IN WHICH THE AVERAGE AMOUNT OF OIL PROCESSED EXCEEDS 2,000 BOPD, AND DOES THE OPERATOR MAINTAIN METER CALIBRATION AND MAINTENANCE RECORDS, AND METER RECORDINGS DETAILING BEGINNING TIMES, END TIMES AND VOLUMES FOR ALL FLARING AND VENTING INCIDENTS, FOR A MINIMUM OF 2 YEARS AT THE FACILITY?

Authority: 30 CFR 250.1163(a) 30 CFR 250.1163(d)

Enforcement Actions: W/C
Production Notification

P-120 HAS THE DISTRICT MANAGER BEEN NOTIFIED, PRIOR TO THE COMMENCEMENT OF PRODUCTION, WHEN A FACILITY IS READY FOR A PREPRODUCTION TEST AND AN INSPECTION OF THE INTEGRATED SAFETY SYSTEM?

Authority: 30 CFR 250.880(a)  Enforcement Actions: C/S

P-121 DID THE OPERATOR RECEIVE APPROVAL FROM THE APPROPRIATE DISTRICT MANAGER PRIOR TO INSTALLING TEMPORARY QUARTERS ON OCS FACILITIES?

Authority: 30 CFR 250.867(a)  Enforcement Actions: W/C

P-122 DID THE OPERATOR RECEIVE APPROVAL FROM THE APPROPRIATE DISTRICT MANAGER PRIOR TO USING TEMPORARY EQUIPMENT ASSOCIATED WITH THE PRODUCTION PROCESS SYSTEM, INCLUDING EQUIPMENT USED FOR WELL TESTING AND/OR WELL CLEAN-UP?

Authority: 30 CFR 250.867(c)  Enforcement Actions: W/C

Fire Water System

P-130 IS AN APPROVED FIREWATER SYSTEM, CONSISTING OF RIGID PIPE WITH FIRE-HOSE STATIONS OR FIXED FIREWATER MONITORS, OR IS AN OPERABLE CHEMICAL SYSTEM, APPROVED BY THE DISTRICT MANAGER, INSTALLED TO PROVIDE PROTECTION IN ALL AREAS WHERE PRODUCTION-HANDLING EQUIPMENT IS LOCATED?

Authority: 30 CFR 250.859(a)  30 CFR 250.860  Enforcement Actions: S

P-131 IS A FIXED WATER SPRAY SYSTEM INSTALLED IN ENCLOSED WELL-BAY AREAS WHERE HYDROCARBON VAPORS MAY ACCUMULATE?

Authority: 30 CFR 250.859(a)  Enforcement Actions: S
P-132  IS FUEL OR POWER FOR FIREWATER PUMP DRIVERS AVAILABLE FOR AT LEAST 30 MINUTES OF RUN TIME DURING A PLATFORM SHUT-IN, AND ARE ALL NEW FIREWATER PUMPDRIVERS EQUIPPED WITH AUTOMATIC STARTING CAPABILITIES UPON ACTIVATION OF THE ESD?
	Authority: 30 CFR 250.859(a)(2)  Enforcement Actions: S

P-133  IS A DIAGRAM OF THE FIREFIGHTING SYSTEM SHOWING THE LOCATION OF ALL FIREFIGHTING EQUIPMENT POSTED IN A PROMINENT PLACE ON THE FACILITY?
	Authority: 30 CFR 250.859(a)(3)  Enforcement Actions: W

P-134  WHEN FOAM FIREFIGHTING SYSTEMS ARE INSTALLED AS PART OF THE FIREFIGHTING SYSTEM THAT PROTECTS PRODUCTION HANDLING AREAS, DID THE OPERATOR CONDUCT ANNUAL INSPECTIONS OF THE FOAM CONCENTRATES AND THEIR TANKS OR STORAGE CONTAINERS FOR EVIDENCE OF EXCESSIVE SLUDGING OR DETERIORATION AND SEND SAMPLES OF THE FOAM CONCENTRATE TO THE MANUFACTURER OR AUTHORIZED REPRESENTATIVE FOR QUALITY CONDITION TESTING?
	Authority: 30 CFR 250.861  Enforcement Actions: W/C

Gas-Detection System

P-150  ARE CONTINUOUSLY MONITORING GAS-DETECTION SYSTEMS INSTALLED IN ALL INADEQUATELY VENTILATED, ENCLOSED CLASSIFIED AREAS, AND SIGNAL AN ALARM AT NO GREATER THAN 25 PERCENT LEL, INITIATING A SHUT-IN SEQUENCE (MANUAL-RESET TYPE) WHEN LEVELS REACH NO MORE THAN 60 PERCENT LEL?
	Authority: 30 CFR 250.862(a)
	30 CFR 250.862(b)  Enforcement Actions: W/C

P-153  IS A FUEL-GAS ODORANT OR AN AUTOMATIC GAS-DETECTION AND ALARM SYSTEM INSTALLED IN ENCLOSED, CONTINUOUSLY MANNED AREAS OF THE FACILITY WHICH ARE PROVIDED WITH FUEL GAS?
	Authority: 30 CFR 250.862(c)  Enforcement Actions: W/C

P-154  IS EACH GAS-DETECTION SYSTEM INSTALLED IN ACCORDANCE WITH API RP 14C, API RP 14G, AND API RP 14F?
	Authority: 30 CFR 250.862(e)  Enforcement Actions: C
P-155  IS EACH COMBUSTIBLE GAS-DETECTION SYSTEM TESTED FOR OPERATION AND RECALIBRATED AT LEAST ONCE EVERY 3 MONTHS?

Authority: 30 CFR 250.880(c)(3)(ii)  Enforcement Actions: W/C

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**Fire-Detection System**

P-170  ARE FIRE (FLAME, HEAT, OR SMOKE) SENSORS OF THE CONTINUOUS MONITORING TYPE AND EQUIPPED WITH A MANUAL RESET INSTALLED IN ALL ENCLOSED CLASSIFIED AREAS?

Authority: 30 CFR 250.862(a) 30 CFR 250.862(b)  Enforcement Actions: W/C

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P-173  IS EACH FIRE-DETECTION SYSTEM INSTALLED IN ACCORDANCE WITH API RP 14C, API RP 14G, AND API RP 14F?

Authority: 30 CFR 250.862(e)  Enforcement Actions: C

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P-175  DOES ACTIVATION OF THE FIRE LOOP SYSTEM OR OTHER FIRE DETECTION SYSTEMS, OR AUTOMATIC DETECTION OF AN ABNORMAL CONDITION, INITIATE SURFACE AND SUBSURFACE SHUT-IN?

Authority: 30 CFR 250.818(c) 30 CFR 250.841(a)  Enforcement Actions: C/S

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P-176  IS EACH FIRE-DETECTION SYSTEM TESTED FOR OPERATION AND RE-CALIBRATED AT LEAST ONCE EVERY 3 MONTHS?

Authority: 30 CFR 250.880(c)(3)(ii)  Enforcement Actions: W/C

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P-177  ARE OPEN FLAMES OR DEVICES OPERATING AT TEMPERATURES WHICH COULD IGNITE A METHANE-AIR MIXTURE NOT USED FOR TESTING?

Authority: 30 CFR 250.880(c)(3)(ii)  Enforcement Actions: C
P-200  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR WELLHEADS?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

P-201  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR HEADERS?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

P-202  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR PRESSURE VESSELS?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

P-203  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR ATMOSPHERIC VESSELS?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

P-204  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR FIRED VESSELS AND EXHAUST HEATED COMPONENTS?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

P-205  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR HEAT EXCHANGERS?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

P-206  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR PUMPS?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

30 CFR 250.1004(b)(9)
P-207  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR COMPRESSORS?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

P-208  IS A TSE LOCATED WHERE SPECIFIED BY TABLE C1 OF API RP 14C FOR ENGINES?

Authority: 30 CFR 250.841(a)  Enforcement Actions: C

P-209  IS A FIRE DETECTION SYSTEM LOCATED IN ACCORDANCE WITH API RP 14 J APPENDIX B.1.1.2 FOR ELECTRIC MOTORS?

Authority: 30 CFR 250.800  30 CFR 250.901(a)(14)  Enforcement Actions: C

P-210  IS A TSE LOCATED WITHIN 5 FEET OF EACH BSDV?

Authority: 30 CFR 250.835(d)  Enforcement Actions: C

P-231  IS AN OPERABLE ESD STATION LOCATED AT EACH HELICOPTER DECK?

Authority: 30 CFR 250.855  Enforcement Actions: S

P-232  IS AN OPERABLE ESD STATION LOCATED AT EACH EXIT STAIRWAY LANDING AT EACH DECK LEVEL?

Authority: 30 CFR 250.855  Enforcement Actions: S

P-233  IS AN OPERABLE ESD STATION LOCATED AT EACH BOAT LANDING?

Authority: 30 CFR 250.855  Enforcement Actions: S
P-234  IS AN OPERABLE ESD STATION LOCATED AT THE CENTER OR EACH END OF A BRIDGE CONNECTING TWO PLATFORMS?

Authority: 30 CFR 250.855

Enforcement Actions: S

P-235  IS AN OPERABLE ESD STATION LOCATED AT EACH EMERGENCY EVACUATION STATION?

Authority: 30 CFR 250.855

Enforcement Actions: S

P-237  IS AN OPERABLE ESD STATION LOCATED NEAR THE MAIN EXITS OF LIVING QUARTERS?

Authority: 30 CFR 250.855

Enforcement Actions: S

P-238  IS A SCHEMATIC OF THE ESD SYSTEM MAINTAINED ON THE FACILITY OR AT THE LESSEE'S NEAREST OCS FIELD OFFICE?

Authority: 30 CFR 250.855(b)

Enforcement Actions: W

P-239  IS THE ESD SYSTEM EQUIPPED WITH MANUALLY OPERATED, QUICK-OPENING, AND NON-RESTRICTED VALVES?

Authority: 30 CFR 250.855(a)

Enforcement Actions: S

P-240  DOES THE SSV AND SDV ON ALL OTHER PROCESS COMPONENTS CLOSE WITHIN 45 SECONDS AFTER AUTOMATIC DETECTION OF AN ABNORMAL CONDITION OR ACTIVATION OF THE ESD?

Authority: 30 CFR 250.821(b) – SSV

30 CFR 250.855 – SDV

Enforcement Actions: C/S
P-241  DOES THE SURFACE-CONTROLLED SSSV CLOSE WITHIN 2 MINUTES AFTER THE ESD OR FIRE DETECTION SYSTEM SHUT-IN SIGNAL HAS CLOSED THE SSV?

**Authority:** 30 CFR 250.821(b)  
**Enforcement Actions:** C/S

P-242  IS EACH ESD SYSTEM TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, BUT AT NO TIME SHALL MORE THAN 6 WEEKS ELAPSE BETWEEN TESTS?

**Authority:** 30 CFR 250.880(c)(3)(iii)  
**Enforcement Actions:** W/C

P-243  IS EACH ESD SYSTEM TEST CONDUCTED BY ALTERNATING ESD STATIONS MONTHLY TO CLOSE AT LEAST ONE WELLHEAD SSV AND VERIFY SURFACE-CONTROLLED SSSV CLOSURE FOR THAT WELL AS INDICATED BY CONTROL CIRCUITRY ACTUATION?

**Authority:** 30 CFR 250.880(c)(3)(iii)  
**Enforcement Actions:** W/S

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**Subsurface Safety Devices**

P-260  ARE ALL TUBING INSTALLATIONS OPEN TO A HYDROCARBON-BEARING ZONE WHICH IS CAPABLE OF NATURAL FLOW EQUIPPED WITH AN SSSV?

**Authority:** 30 CFR 250.810  
30 CFR 250.825(a)  
**Enforcement Actions:** C

P-261  ARE NEW COMPLETIONS (PERFORATED BUT NOT PLACED ON PRODUCTION) AND COMPLETIONS SHUT-IN FOR A PERIOD OF MORE THAN 6 MONTHS EQUIPPED WITH EITHER (1) A PUMP-THROUGH TYPE TUBING PLUG; (2) A SURFACE-CONTROLLED SSSV WITH THE SURFACE CONTROL RENDERED INOPERATIVE; OR (3) AN INJECTION VALVE CAPABLE OF PREVENTING BACK FLOW?

**Authority:** 30 CFR 250.815  
30 CFR 250.829(a)  
**Enforcement Actions:** W
IS A SURFACE-CONTROLLED SSSV OR AN INJECTION VALVE CAPABLE OF PREVENTING BACK FLOW INSTALLED IN EACH INJECTION WELL?

**Authority:** 30 CFR 250.816 30 CFR 250.830 30 CFR 250.874(a)  
**Enforcement Actions:** C

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IS A SUBSURFACE SAFETY DEVICE INSTALLED AT A DEPTH OF 100 FEET OR MORE BELOW THE SEA FLOOR WITHIN 2 DAYS AFTER PRODUCTION IS ESTABLISHED?

**Authority:** 30 CFR 250.814(a) 30 CFR 250.828(a)  
**Enforcement Actions:** W/C

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IF THE SSSV IS REMOVED AND THE ZONE IS OPEN TO FLOW, IS FLOWING NECESSARY FOR THE OPERATION BEING CONDUCTED?

**Authority:** 30 CFR 250.814(c)  
**Enforcement Actions:** W/C

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IS A PERSON IN THE IMMEDIATE VICINITY OF THE WELL IF THE MASTER VALVE IS OPEN AND THE SUBSURFACE SAFETY DEVICE IS NOT INSTALLED?

**Authority:** 30 CFR 250.817  
**Enforcement Actions:** C

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ARE ALL TUBING INSTALLATIONS IN WHICH A WIRELINE OR PUMPDOWN-RETRIEVABLE SUBSURFACE SAFETY DEVICE IS INSTALLED EQUIPPED WITH A LANDING NIPPLE WITH FLOW COUPLINGS OR OTHER PROTECTIVE EQUIPMENT ABOVE AND BELOW TO PROVIDE FOR THE SETTING OF THE SSSV?

**Authority:** 30 CFR 250.810 30 CFR 250.818(a) 30 CFR 250.832(a)  
**Enforcement Actions:** C

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DOES EACH SURFACE-CONTROLLED AND SUBSURFACE-CONTROLLED SSSV AND ASSOCIATED SAFETY VALVE LOCK AND LANDING NIPPLE CONFORM TO THE CERTIFICATION REQUIREMENTS IN 30 CFR 250.801 THROUGH 802?

**Authority:** 30 CFR 250.802  
**Enforcement Actions:** C
WHEN THE SUBSURFACE SAFETY DEVICE HAS BEEN REMOVED FOR MORE THAN 15 DAYS HAS BSEE APPROVAL BEEN GIVEN?

Authority: 30 CFR 250.817(a)  
Enforcement Actions: W/C

WHEN THE SUBSURFACE SAFETY DEVICE HAS BEEN REMOVED, IS THE WELL IDENTIFIED BY A SIGN ON THE WELLHEAD STATING THAT THE SUBSURFACE SAFETY DEVICE HAS BEEN REMOVED?

Authority: 30 CFR 250.817(b)  
Enforcement Actions: W/C

WHEN THE SUBSURFACE SAFETY DEVICE HAS BEEN REMOVED FOR ROUTINE OPERATIONS ON A SATELLITE STRUCTURE, IS THE WELL ATTENDED?

Authority: 30 CFR 250.817(c)  
Enforcement Actions: W/C

Subsurface Safety Device Testing

IS EACH SURFACE-CONTROLLED SSSV INSTALLED IN A WELL TESTED WHEN INSTALLED OR REINSTALLED AND AT INTERVALS NOT EXCEEDING 6 MONTHS AND REMOVED, REPAIRED AND REINSTALLED, OR REPLACED, IF IT DOES NOT OPERATE PROPERLY?

Authority: 30 CFR 250.880(c)(1)(i)  
30 CFR 250.880(c)(4)(i)  
Enforcement Actions: W/C

IS EACH SUBSURFACE-CONTROLLED SSSV INSTALLED IN A WELL REMOVED, INSPECTED, AND REPAIRED OR ADJUSTED, AND REINSTALLED OR REPLACED AS NECESSARY AT INTERVALS NOT EXCEEDING 6 MONTHS FOR THOSE VALVES NOT INSTALLED IN A LANDING NIPPLE AND 12 MONTHS FOR THOSE VALVES INSTALLED IN A LANDING NIPPLE?

Authority: 30 CFR 250.880(c)(1)(ii)  
Enforcement Actions: W/C

IS EACH TUBING PLUG INSTALLED IN A WELL TESTED FOR LEAKAGE AT INTERVALS NOT EXCEEDING 6 MONTHS AND REMOVED, REPAIRED AND REINSTALLED, OR REPLACED, IF IT LEAKS?

Authority: 30 CFR 250.880(c)(1)(iii)  
Enforcement Actions: W
P-284  IS EACH INJECTION VALVE INSTALLED IN A WELL INSPECTED FOR LEAKAGE AT INTERVALS NOT EXCEEDING 6 MONTHS AND REMOVED, REPAIRED AND REINSTALLED, OR REPLACED, IF IT LEAKS?

Authority: 30 CFR 250.880(c)(1)(iv)  Enforcement Actions: W/C

Surface Safety Device Records

P-300  IS EACH PUMP FOR A FIREWATER SYSTEM INSPECTED AND TESTED FOR OPERATION WEEKLY AND REPAIRED OR REPLACED IF FOUND DEFECTIVE?

Authority: 30 CFR 250.880(c)(3)(i)  Enforcement Actions: W/S

P-301  IS EACH PSH TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, WITH NO MORE THAN 6 WEEKS ELAPSING BETWEEN TESTS?

Authority: 30 CFR 250.880(c)(3)(x)  Enforcement Actions: W/C

P-302  IS EACH PSL TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, WITH NO MORE THAN 6 WEEKS ELAPSING BETWEEN TESTS?

Authority: 30 CFR 250.880(c)(3)(x)  Enforcement Actions: W/C

P-303  IS EACH LSH TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, WITH NO MORE THAN 6 WEEKS ELAPSING BETWEEN TESTS?

Authority: 30 CFR 250.880(c)(3)(x)  Enforcement Actions: W/C

P-304  IS EACH LSL TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, WITH NO MORE THAN 6 WEEKS ELAPSING BETWEEN TESTS?

Authority: 30 CFR 250.880(c)(3)(x)  Enforcement Actions: W/C
IS EACH AUTOMATIC INLET SDV AND EACH LIQUID DISCHARGE SDV TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, WITH NO MORE THAN 6 WEEKS ELAPSING BETWEEN TESTS?

**Authority:** 30 CFR 250.880(c)(2)(ii)  
**Enforcement Actions:** W/C

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IS EACH SSV TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, WITH NO MORE THAN 6 WEEKS ELAPSING BETWEEN TESTS, AND REPAIRED OR REPLACED IF FOUND DEFECTIVE?

**Authority:** 30 CFR 250.880(c)(2)(iv)  
**Enforcement Actions:** W/C

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IS EACH FLOWLINE FSV TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, WITH NO MORE THAN 6 WEEKS ELAPSING BETWEEN TESTS, AND REPAIRED OR REPLACED IF FOUND DEFECTIVE?

**Authority:** 30 CFR 250.880(c)(2)(v)  
**Enforcement Actions:** W/C

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IS EACH TSH ON COMPRESSOR INSTALLATIONS TESTED FOR OPERATION AT LEAST ONCE EVERY 6 MONTHS AND REPAIRED OR REPLACED IF FOUND DEFECTIVE?

**Authority:** 30 CFR 250.880(c)(3)(v)  
**Enforcement Actions:** W/C

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IS EACH TSH ON NON-COMPRESSOR INSTALLATIONS TESTED FOR OPERATION AT LEAST ONCE EVERY 12 MONTHS?

**Authority:** 30 CFR 250. 880(c)(3)(iv)  
**Enforcement Actions:** W/C

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IS EACH BSL TESTED FOR OPERATION AT LEAST ONCE EVERY 12 MONTHS?

**Authority:** 30 CFR 250.880(c)(3)(vi)  
**Enforcement Actions:** W/C

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IS EACH FSL TESTED FOR OPERATION AT LEAST ONCE EVERY 12 MONTHS?

**Authority:** 30 CFR 250.880(c)(3)(vii)  
**Enforcement Actions:** W/C
IS EACH PSV TESTED FOR OPERATION AT LEAST ONCE EVERY 12 MONTHS?

**Authority:** 30 CFR 250.880(c)(2)(i)  
**Enforcement Actions:** W/C

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IS EACH ELECTRONIC PSH TESTED FOR OPERATION EVERY 3 MONTHS, WITH NO MORE THAN 120 DAYS ELAPSING BETWEEN TESTS?

**Authority:** 30 CFR 250.880(c)(3)(ix)  
**Enforcement Actions:** W/C

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IS EACH ELECTRONIC PSL TESTED FOR OPERATION EVERY 3 MONTHS, WITH NO MORE THAN 120 DAYS ELAPSING BETWEEN TESTS?

**Authority:** 30 CFR 250.880(c)(3)(ix)  
**Enforcement Actions:** W/C

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IS EACH ELECTRONIC LSH TESTED FOR OPERATION EVERY 3 MONTHS, WITH NO MORE THAN 120 DAYS ELAPSING BETWEEN TESTS?

**Authority:** 30 CFR 250.880(c)(3)(ix)  
**Enforcement Actions:** W/C

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IS EACH ELECTRONIC LSL TESTED FOR OPERATION EVERY 3 MONTHS, WITH NO MORE THAN 120 DAYS ELAPSING BETWEEN TESTS?

**Authority:** 30 CFR 250.880(c)(3)(ix)  
**Enforcement Actions:** W/C

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IS EACH PRIMARY USV TESTED FOR OPERATION AT LEAST ONCE EVERY 3 CALENDAR MONTHS, NOT TO EXCEED 120 DAYS AND IF THE DEVICE DOES NOT FUNCTION PROPERLY, OR IF A LIQUID LEAKAGE RATE > 400 CUBIC CENTIMETERS PER MINUTE OR A GAS LEAKAGE RATE > 15 CUBIC FEET PER MINUTE IS OBSERVED, THE VALVE MUST BE REMOVED, REPAIRED, AND REINSTALLED, OR REPLACED?

**Authority:** 30 CFR 250.880(c)(4)(ii)  
**Enforcement Actions:** W/C
IS EACH BSDV TESTED FOR OPERATION AT LEAST ONCE EACH MONTH, NOT TO EXCEED 6 WEEKS AND IF THE DEVICE DOES NOT FUNCTION PROPERLY, OR IF A LIQUID LEAKAGE RATE OR A GAS LEAKAGE RATE IS OBSERVED, THE VALVE MUST BE REMOVED, REPAIRED, AND REINSTALLED, OR REPLACED?

**P-319**

**Authority:** 30 CFR 250.880(c)(iii)  
**Enforcement Actions:** W/C

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Records

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DOES THE LESSEE MAINTAIN RECORDS FOR A PERIOD OF 2 YEARS AT THE LESSEE’S NEAREST OCS FIELD OFFICE THAT INCLUDE DATES AND DETAILS OF INSTALLATION, REMOVAL, INSPECTION, TESTING, REPAIRING, ADJUSTMENTS AND REINSTALLATION FOR EACH SUBSURFACE AND SURFACE SAFETY DEVICE INSTALLED?

**P-320**

**Authority:** 30 CFR 250.890(b)  
**Enforcement Actions:** W/C

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HAS THE OPERATOR SUBMITTED TO THE APPROPRIATED DISTRICT MANAGER A CONTACT LIST FOR ALL OCS OPERATED PLATFORMS AT LEAST ANNUALLY OR WHEN CONTACT INFORMATION IS REVISED?

**P-321**

**Authority:** 30 CFR 250.890(c)  
**Enforcement Actions:** W

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Surface (Non-Pipeline) Pumps

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IS EACH NON-PIPELINE PUMP EQUIPPED WITH A PSH?

**P-340**

**Authority:** 30 CFR 250.865(a)  
30 CFR 250.865(b)  
**Enforcement Actions:** C

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IS EACH NON-PIPELINE PUMP EQUIPPED WITH A PSL?

**P-341**

**Authority:** 30 CFR 250.865(a) - PSL installed  
30 CFR 250.865(c) - PSL set psi/test tolerance  
30 CFR 250.865(d) - PSL > 45 seconds  
30 CFR 250.870(a) - PSL > 45 seconds BSEE approval  
**Enforcement Actions:** C
P-342  IS EACH NON-PIPELINE PUMP EQUIPPED WITH A PSV?

Authority: 30 CFR 250.865(a)  Enforcement Actions: C

P-343  IS EACH NON-PIPELINE PUMP EQUIPPED WITH A FSV?

Authority: 30 CFR 250.865(a)  Enforcement Actions: C

P-344  IS EACH GLYCOL POWERED GLYCOL PUMP EQUIPPED WITH A SDV?

Authority: 30 CFR 250.865(a)  Enforcement Actions: C

Subsea (Non-Pipeline) Pumps

P-350  IS EACH SUBSEA PUMP EQUIPPED WITH PSH(s)?

Authority: 30 CFR 250.875(b)  Enforcement Actions: W/C
30 CFR 250.875(c)(1)
30 CFR 250.875(e)(2)

P-351  IS EACH SUBSEA PUMP EQUIPPED WITH PSL(s)?

Authority: 30 CFR 250.875(b)  Enforcement Actions: W/C
30 CFR 250.875(c)(1)
30 CFR 250.875(e)(2)

P-352  IS EACH SUBSEA PUMP EQUIPPED WITH AN ISOLATION VALVE AT THE INLET OF THE PUMP?

Authority: 30 CFR 250.875(a)  Enforcement Actions: C
Gas Lift and Injection Lines

**P-361**  
**IS EACH WELLHEAD INJECTION LINE AND GAS LIFT LINE EQUIPPED WITH A PSH?**

**Authority:**  
30 CFR 250.841(a) – Dry Tree  
30 CFR 250.873(b) – Subsea Tree  
30 CFR 250.874(c) – Subsea Tree

**Enforcement Actions:** C

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**P-362**  
**IS EACH WELLHEAD INJECTION LINE AND GAS LIFT LINE EQUIPPED WITH A PSL?**

**Authority:**  
30 CFR 250.841(a) – Dry Tree  
30 CFR 250.873(b) – Subsea Tree  
30 CFR 250.874(c) – Subsea Tree

**Enforcement Actions:** C

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**P-364**  
**IS EACH WELLHEAD INJECTION LINE AND GAS LIFT LINE EQUIPPED WITH A FSV?**

**Authority:**  
30 CFR 250.841(a)  
30 CFR 250.1004(b)(7)

**Enforcement Actions:** C

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**P-365**  
**IS EACH DEPARTING SUBSEA GAS LIFT SUPPLY (GLS) LINE AND DEPARTING SUBSEA WATER INJECTION (WI) LINE EQUIPPED WITH AN FSV?**

**Authority:**  
30 CFR 250.873(b)(1)  
30 CFR 250.873(b)(2)  
30 CFR 250.873(b)(3)  
30 CFR 250.874(b)

**Enforcement Actions:** C

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**P-366**  
**IS EACH DEPARTING SUBSEA GAS LIFT SUPPLY LINE EQUIPPED WITH A GAS LIFT SHUT DOWN VALVE (GLSDV)?**

**Authority:**  
30 CFR 250.873(b)  
30 CFR 250.873(d)

**Enforcement Actions:** C
**P-367**  
**IS EACH SUBSEA GAS LIFT INJECTION POINT EQUIPPED WITH A GAS LIFT INJECTION VALVE (GLIV)?**  
**Authority:**  
30 CFR 250.873(b)(1)(ii)  
30 CFR 250.873(b)(2)  
30 CFR 250.873(b)(3)(iii)  
30 CFR 250.873(d)  
**Enforcement Actions:** C

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**P-369**  
**IS EACH DEPARTING WATER INJECTION LINE EQUIPPED WITH A WATER INJECTION SHUT DOWN VALVE (WISDV)?**  
**Authority:**  
30 CFR 250.874(b)  
30 CFR 250.874(g)(1)  
**Enforcement Actions:** C

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**Headers**

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**P-380**  
**IS EACH HEADER EQUIPPED WITH A PSH?**  
**Authority:**  
30 CFR 250.841(a)  
30 CFR 250.852  
**Enforcement Actions:** C

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**P-381**  
**IS EACH HEADER EQUIPPED WITH A PSL?**  
**Authority:**  
30 CFR 250.841(a)  
30 CFR 250.852  
**Enforcement Actions:** C

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**P-385**  
**IF A NECESSARY ALTERATION OR DISCONNECTION OF THE PIPELINE OR UMBILICAL OF ANY SUBSEA WELL AFFECTS THE OPERATORS ABILITY TO MONITOR CASING PRESSURE OR TO TEST ANY SUBSEA VALVES OR EQUIPMENT, DID THE OPERATOR NOTIFY THE APPROPRIATE DISTRICT OFFICE AT LEAST 48 HOUR IN ADVANCE AND SUBMIT A REPAIR OR REPLACEMENT PLAN?**  
**Authority:**  
30 CFR 250.831  
30 CFR 250.880(a)(3)  
30 CFR 250.880(d)(2)(i)  
**Enforcement Actions:** W
P-390  DID THE OPERATOR FOLLOW THE VALVE CLOSURE TIMING TABLE FOR ELECTRO- HYDRAULIC CONTROL SYSTEMS?

Authority: 30 CFR 250.838(b)  Enforcement Actions: W

P-391  DID THE OPERATOR FOLLOW THE VALVE CLOSURE TIMING TABLE FOR ELECTRO- HYDRAULIC CONTROL SYSTEMS WITH LOSS OF COMMUNICATIONS?

Authority: 30 CFR 250.838(d)  Enforcement Actions: W

P-392  DID THE OPERATOR FOLLOW THE VALVE CLOSURE TIMING TABLE FOR DIRECT HYDRAULIC CONTROL SYSTEMS?

Authority: 30 CFR 250.839(b)  Enforcement Actions: W

Wellhead and Flowlines

P-402  IS THE PSH ON EACH FLOWLINE SEGMENT SET NO HIGHER THAN 15 PERCENT OR 5 PSI, WHICHERVER IS GREATER, ABOVE THE HIGHEST PRESSURE IN THE OPERATING RANGE AND BELOW THE SITP OR THE GAS-LIFT SUPPLY PRESSURE?

Authority: 30 CFR 250.852(b)(1)  Enforcement Actions: C

P-404  IS THE PSL ON EACH FLOWLINE SEGMENT SET NO LOWER THAN 15 PERCENT OR 5PSI WHICHEVER IS GREATER, BELOW THE LOWEST PRESSURE IN THE OPERATING RANGE?

Authority: 30 CFR 250.852(b)(2)  Enforcement Actions: C

P-405  IF THE MAXIMUM ALLOWABLE WP OF THE FLOWLINE IS LESS THAN THE SITP, IS A PSV, OR ADDITIONAL SSV ACTIVATED BY AN INDEPENDENT PSH, INSTALLED?

Authority: 30 CFR 250.841  
30 CFR 250.852(c)  Enforcement Actions: C
IS AN OPERABLE FSV INSTALLED IN THE FINAL FLOWLINE SEGMENT?

**Authority:** 30 CFR 250.841
30 CFR 250.852(g)

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DO THE WELLHEAD, TREE, AND RELATED EQUIPMENT HAVE A PRESSURE RATING GREATER THAN THE SITP?

**Authority:** 30 CFR 250.518(d) - Completion
30 CFR 250.619(d) - Workover

---

DOES EACH WELLHEAD SSV, USV, BSDV AND ITS ACTUATOR CONFORM TO THE CERTIFICATION REQUIREMENTS IN 30 CFR 250.801 through 802?

**Authority:** 30 CFR 250.801
30 CFR 250.802

---

IS EACH WELLHEAD COMPLETION EQUIPPED WITH A MINIMUM OF ONE MASTER VALVE AND AN OPERABLE SSV LOCATED ABOVE THE MASTER VALVE, IN THE VERTICAL RUN OF THE TREE?

**Authority:** 30 CFR 250.518(c) – Completion
30 CFR 250.619(c) – Work over
30 CFR 250.820 – SSV Detectable Leakage
30 CFR 250.834 – USV Detectable Leakage
30 CFR 250.836 – BSDV Detectable Leakage

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**Tubing and Wellhead Equipment**

**DEFINITIONS:**

1. **“A” Annulus:** the annulus designation between production tubing and production casing

2. **“B” Annulus:** the annulus designation between the production casing and next outer casing. The letter designation continues in sequence for each and every annular space encountered between casing strings up to and including the surface casing and conductor casing strings.

3. **Conductor Casing:** provides structural support for the well, wellhead and completion equipment, and often provides hole stability for initial drilling operations. This casing string is not designed for pressure containment, but upon completion of the well, it may have a casing head, therefore, it may be capable of containing low annular pressures. This casing is set prior to encountering any hydrocarbons at a depth where the fracture gradient will allow for an increase in mud density and is cemented to the surface or mudline. For subsea hybrid wells, the low pressure subsea wellhead is normally installed on this casing string.
4. **Drive/Jet Pipe**: Supports unconsolidated deposits and provides hole stability for initial drilling operations. This first string set and provides no pressure containment. This string also provides structural support to the well system.

5. **Intermediate Casing**: Casing is set when geological characteristics or wellbore conditions indicate downhole protection is needed or to prevent loss of circulation by casing off weaker formation. Multiple intermediate casing strings can be run in a single well.

6. **Liner Casing**: A casing string suspended near the bottom end of previous strings using a liner hangar.

7. **Production Casing**: Casing that is the inner most string of casing in the well. Production fluid enters the casing below the production packer and continues to the surface through the production string. At a minimum, the production casing will be rated for the maximum anticipated pressure that may be encountered from the production zone.

8. **Production Liner**: A liner that is the innermost string in which the productive zones are completed. The casing in which the production liner is hung off is usually referred to as the production casing.

9. **Production Riser**: The casing string rising from the seafloor to the wellhead on fixed platforms, or the casing strings attached to the subsea wellhead rising from the seafloor to the surface wellhead on hybrid wells.

10. **Production string (or Completion String)**: The production string consists primarily of production tubing, but also includes additional components such as the surface – controlled subsurface safety valve (SCSSV, gas lift mandrels, chemical injections and instruments ports, landing nipples, and packer or packer seals assemblies. The production string runs inside the production casing and used to conduct production fluids to the surface.

11. **Production Tubing**: Tubing that is run inside the production casing and used to convey produced fluids from the hydrocarbon-bearing formation to the surface. Tubing may also be used for injection. In hybrid wells, for example, tubing is used as a conduit for gas for artificial lift below a mud line pack-off tubing hangar to isolate the gas lift pressure from the production riser.

12. **Surface Casing**: Casing run inside the conductor casing to protect shallow water zones and weaker formations and may be cemented within the conductor string and is often cemented back to the mud line. The surface wellhead is normally installed on this string for surface wells.

13. **Structural Pipe Casing Strings**: Casing strings used to facilitate the drilling of the well, but not need for pressure containment after the well has been drilled. Support unconsolidated sediments and provide whole stability for initial drilling operations, axial support for casing loads and bending loads from the subsea wellhead.

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**P-413**

**IS EACH TREE INSTALLED EQUIPPED WITH EQUIPMENT TO MONITOR THE CASING PRESSURE ACCORDING TO THE FOLLOWING CHART?**

**Authority**: 30 CFR 250.518 (b)  
**Enforcement Actions**: C

<table>
<thead>
<tr>
<th>If you have....</th>
<th>You must equip....</th>
<th>So you can monitor....</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Fixed platform wells,</td>
<td>The Wellhead,</td>
<td>All annuli (A, B, C, D, etc., annuli).</td>
</tr>
<tr>
<td>(2) Subsea wells,</td>
<td>The tubing head,</td>
<td>The production casing annulus (A annulus).</td>
</tr>
<tr>
<td>(3) Hybrid* wells,</td>
<td>The surface wellhead,</td>
<td>All annuli at the surface (A and B riser annuli). If the production casing below the mudline and the production casing riser above the mudline are pressure isolated from each other, provisions must be made to monitor the production casing below the mudline for casing pressure.</td>
</tr>
</tbody>
</table>

* Characterized as a well drilled with a subsea wellhead and completed with a surface casing head, a surface tubing head, a surface tubing hanger, and a surface Christmas tree.
Casing Pressure Management

P-414
IS THE OPERATOR MONITORING CASING PRESSURE FOR EACH WELL ACCORDING TO THE FOLLOWING TABLE?
Authority: 30 CFR 250.520
Enforcement Actions: W

<table>
<thead>
<tr>
<th>If you have...</th>
<th>You must monitor</th>
<th>With a minimum one pressure data point recorded per...</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Fixed platform wells,</td>
<td>Monthly</td>
<td>Month for each casing</td>
</tr>
<tr>
<td>(b) Subsea well,</td>
<td>Continuously</td>
<td>Day for the production Casing</td>
</tr>
<tr>
<td>(c) Hybrid well*,</td>
<td>Continuously</td>
<td>Day for each riser and/or the production casing</td>
</tr>
<tr>
<td>(d) Well operating under a casing pressure request on a manned fixed platform</td>
<td>Daily,</td>
<td>Day for each casing</td>
</tr>
<tr>
<td>(e) Wells operating under a casing pressure request on an unmanned platform,</td>
<td>Weekly,</td>
<td>Week for each casing</td>
</tr>
</tbody>
</table>

*Characterized as a well drilled with a subsea wellhead and completed with a surface casing head, a surface tubing head, a surface tubing hanger, and a surface Christmas tree.

P-415
ARE ALL CASING DIAGNOSTIC TESTS PERFORMED WITHIN 30 DAYS AFTER FIRST OBSERVING OR IMPOSING CASING PRESSURE ACCORDING TO THE FOLLOWING CHART?
Authority: 30 CFR 250.521
Enforcement Actions: W

<table>
<thead>
<tr>
<th>If you have a...</th>
<th>You must perform a casing diagnostic test if...</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Fixed platform well,</td>
<td>The casing pressure is greater than 100 psig.</td>
</tr>
<tr>
<td>(2) Subsea well,</td>
<td>The measurable casing pressure is greater than the external hydrostatic pressure plus 100 psig measured at the subsea wellhead. Hydrostatic pressure = (.052 x 8.6 x water depth)</td>
</tr>
<tr>
<td>(3) Hybrid well*,</td>
<td>A riser or the production casing pressure is greater than 100 psig measured at the surface.</td>
</tr>
</tbody>
</table>

*Characterized as a well drilled with a subsea wellhead and completed with a surface casing head, a surface tubing head, a surface tubing hanger, and a surface Christmas tree.
**DID THE OPERATOR REPEAT CASING DIAGNOSTIC TESTING WHEN REQUIRED?**

*Authority:* 30 CFR 250.523  
*Enforcement Actions:* W

*Casing diagnostic testing must be repeated in accordance with the following table:

<table>
<thead>
<tr>
<th>When...</th>
<th>You must repeat diagnostic testing...</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Your casing pressure request approved term has expired,</td>
<td>Immediately.</td>
</tr>
<tr>
<td>(b) Your well, previously on gas lift, has been shut-in or returned to flowing status without gas lift for more than 180 days,</td>
<td>Immediately on the production casing (A annulus). The production casing (A annulus) of wells on active gas lift are exempt from diagnostic testing.</td>
</tr>
<tr>
<td>(c) Your casing pressure request becomes invalid,</td>
<td>Within 30 days.</td>
</tr>
<tr>
<td>(d) A casing or riser has an increase in pressure greater than 200 psig over the previous casing diagnostic test,</td>
<td>Within 30 days.</td>
</tr>
<tr>
<td>(e) After any corrective action has been taken to remediate undesirable casing pressure, either as a result of a casing pressure request denial or any other action,</td>
<td>Within 30 days.</td>
</tr>
<tr>
<td>(f) Your fixed platform well production casing (A annulus) has pressure exceeding 10 percent of its minimum internal yield pressure (MIYP), except for production casings on active gas lift,</td>
<td>Once per year, not to exceed 12 months between tests.</td>
</tr>
<tr>
<td>(g) Your fixed platform well’s outer casing (B, C, D, etc., annuli) has a pressure exceeding 20 percent of its MIYP,</td>
<td>Once every 5 years, at a minimum.</td>
</tr>
</tbody>
</table>

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**DOES THE OPERATOR RETAIN RECORDS OF CASING PRESSURES AND DIAGNOSTICS TESTS AS REQUIRED?**

*Authority:* 30 CFR 250.524  
*Enforcement Actions:* W

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**DID THE OPERATOR TAKE ACTION BASED ON THE RESULTS FROM THEIR CASING DIAGNOSTIC TEST?**

*Authority:* 30 CFR 250.525  
*Enforcement Actions:* W
**P-419**

**DID THE OPERATOR SUBMIT A NOTIFICATION OF CORRECTIVE ACTION OR A CASING PRESSURE REQUEST WITHIN 14 DAYS AFTER PERFORMING A CASING DIAGNOSTIC TEST REQUIRING ACTION UNDER 30 CFR 250.525?**

**Authority:** 30 CFR 250.526

**Enforcement Actions:** W

*Casing diagnostic test requires action in accordance with the following table:*

<table>
<thead>
<tr>
<th>You must submit either...</th>
<th>To the appropriate...</th>
<th>And it must include...</th>
<th>You must also...</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) a notification of corrective action; or,</td>
<td>District Manager and copy the Regional Supervisor, Field Operations,</td>
<td>Requiremen ts under 250.527,</td>
<td>Submit an Application for Permit to Modify or Corrective Action Plan within 30 days of the diagnostic test.</td>
</tr>
<tr>
<td>(b) a casing pressure request,</td>
<td>Regional Supervisor, Field Operations,</td>
<td>Requirements under 250.528.</td>
<td></td>
</tr>
</tbody>
</table>

---

**Pressure Vessels**

**P-422**

**IS EACH PRESSURE VESSEL EQUIPPED WITH AN OPERABLE LSH?**

**Authority:** 30 CFR 250.841

30 CFR 250.850

30 CFR 250.853(d)

**Enforcement Actions:** C

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**P-423**

**IS EACH PRESSURE VESSEL EQUIPPED WITH AN OPERABLE LSL (OIL)?**

**Authority:** 30 CFR 250.841

30 CFR 250.850

30 CFR 250.853(d)

**Enforcement Actions:** C

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**P-424**

**IS EACH PRESSURE VESSEL EQUIPPED WITH AN OPERABLE LSL (WATER)?**

**Authority:** 30 CFR 250.841

30 CFR 250.850

30 CFR 250.853(d)

**Enforcement Actions:** C

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**P-426**

**IS EACH PRESSURE VESSEL EQUIPPED WITH A FSV (OIL)?**

**Authority:** 30 CFR 250.841

30 CFR 250.850

**Enforcement Actions:** C
P-427  IS EACH PRESSURE VESSEL EQUIPPED WITH A FSV (WATER)?
Authority: 30 CFR 250.841 30 CFR 250.850  
Enforcement Actions: C

P-428  IS EACH PRESSURE VESSEL EQUIPPED WITH A FSV (GAS)?
Authority: 30 CFR 250.841 30 CFR 250.850
Enforcement Actions: C

P-429  IS EACH STOP VALVE BETWEEN A PSV AND A PRESSURE VESSEL LOCKED OR SEALED IN THE OPEN POSITION WHEN AN AUTHORIZED PERSON IS NOT STATIONED AT THE PRESSURE VESSEL, AS REQUIRED IN THE ASME BOILER AND PRESSURE VESSEL CODE, SECTION VIII, APPENDIX M?
Authority: 30 CFR 250.851(a)(3)(i)  
Enforcement Actions: W

P-430  ARE PRESSURED AND FIRED VESSELS CODE STAMPED IN ACCORDANCE WITH THE ASME BOILER AND PRESSURE VESSEL CODE?
Authority: 30 CFR 250.851(a)(1)(i)  
Enforcement Actions: C

P-431  IS THE PSH ON EACH PRESSURE VESSEL SET NO HIGHER THAN 15 PERCENT OR 5 PSI, WHICHEREVER IS GREATER, ABOVE THE HIGHEST PRESSURE IN THE OPERATING RANGE AND AT LEAST 5 PERCENT OR 5 PSI, WHICHEREVER IS GREATER, BELOW THE PSV’S ACTIVATION PRESSURE?
Authority: 30 CFR 250.851(b) 30 CFR 250.851(c)(1)  
Enforcement Actions: C

P-433  IS THE PSL ON EACH PRESSURE VESSEL SET NO LOWER THAN 15 PERCENT OR 5 PSI, WHICHEREVER IS GREATER, BELOW THE LOWEST PRESSURE IN THE OPERATING RANGE?
Authority: 30 CFR 250.851(b) 30 CFR 250.851(c)(2)  
Enforcement Actions: C
ARE PRESSURE VESSELS MAINTAINED, INSPECTED, RATED, REPAIRED, AND ALTERED IN ACCORDANCE WITH THE APPLICABLE PROVISIONS OF THE AMERICAN PETROLEUM INSTITUTE’S PRESSURE VESSEL INSPECTION CODE: MAINTENANCE INSPECTION, RATING, REPAIR, AND ALTERATION API 510 (EXCEPT SECTIONS 6.5 AND 8.5), EFFECTIVE MARCH 15, 2005?

Authority: 30 CFR 250.198

Enforcement Actions: W/C

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Relief Valves

IS EACH REQUIRED PSV DESIGNED, INSTALLED, AND MAINTAINED IN ACCORDANCE WITH APPLICABLE PROVISIONS OF SECTIONS I, IV, AND VIII OF THE ASME BOILER AND PRESSURE VESSEL CODE AND SET AT A PRESSURE NO HIGHER THAN THE MAXIMUM ALLOWABLE WORKING PRESSURE?

Authority: 30 CFR 250.841 – PSV
30 CFR 250.851(a)(3)(ii) – Set Pressure
30 CFR 250.880(b)(2) – Test Tolerance
30 CFR 250.880(c)(2)(i) – Tested Annually

Enforcement Actions: C

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IS EACH PSV AND VENT PIPED IN SUCH A WAY AS TO PREVENT FLUID FROM STRIKING PERSONNEL OR IGNITION SOURCES?

Authority: 30 CFR 250.851(a)(3)(iii)

Enforcement Actions: C

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Atmospheric Vessels

IS EACH ATMOSPHERIC VESSEL EQUIPPED WITH AN OPERABLE LSH?

Authority: 30 CFR 250.872

Enforcement Actions: C

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IS EACH ATMOSPHERIC VESSEL EQUIPPED WITH AN OPERABLE LSL (WATER)?

Authority: 30 CFR 250.872(a)

Enforcement Actions: C
P-472  IS EACH ATMOSPHERIC VESSEL EQUIPPED WITH AN OPERABLE LSL (OIL)?
Authority: 30 CFR 250.872(a)  Enforcement Actions: C

P-474  IS EACH ATMOSPHERIC VESSEL EQUIPPED WITH AN OPERABLE PSV AND A VENT OR TWO INDEPENDENT VENTS?
Authority: 30 CFR 250.872(a)  Enforcement Actions: C

P-475  IS EACH ATMOSPHERIC VESSEL EQUIPPED WITH AN OPERABLE FLAME ARRESTER ON VENT(S)?
Authority: 30 CFR 250.872  Enforcement Actions: C

Fired and Heated Components

P-520  IS EACH FIRED COMPONENT EQUIPPED WITH AN OPERABLE PSH?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-521  IS EACH FIRED COMPONENT EQUIPPED WITH AN OPERABLE SDV?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-522  IS EACH FIRED COMPONENT EQUIPPED WITH AN OPERABLE TSL OR BSL IN THE FIRE CHAMBER?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-523  IS EACH FIRED OR EXHAUST HEATED COMPONENT EQUIPPED WITH A TSH IN THE STACK?
Authority: 30 CFR 250.850  Enforcement Actions: C
P-524  IS EACH FIRED OR EXHAUST HEATED COMPONENT EQUIPPED WITH A TSH IN THE MEDIUM OR PROCESS FLUID?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-525  IS EACH FIRED OR EXHAUST HEATED COMPONENT EQUIPPED WITH AN LSL IN THE MEDIUM OR PROCESS FLUID?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-526  IS EACH NATURAL DRAFT FIRED COMPONENT EQUIPPED WITH AN INTAKE FLAME ARRESTER?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-527  IS EACH NATURAL DRAFT FIRED COMPONENT EQUIPPED WITH A STACK ARRESTER?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-528  IS EACH FORCED DRAFT FIRED COMPONENT EQUIPPED WITH AN OPERABLE PSL IN THE AIR INTAKE?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-529  IS EACH FORCED DRAFT FIRED COMPONENT EQUIPPED WITH AN OPERABLE PSL IN THE FUEL SUPPLY LINE?
Authority: 30 CFR 250.850  Enforcement Actions: C

P-530  IS EACH FORCED DRAFT FIRED COMPONENT EQUIPPED WITH AN OPERABLE MOTOR STARTER INTERLOCK?
Authority: 30 CFR 250.850  Enforcement Actions: C
IS EACH DIRECT FIRED TUBE-TYPE OR EXHAUST HEATED COMPONENT EQUIPPED WITH AN OPERABLE FSL IN THE MEDIUM OR PROCESS FLUID WHEN IT IS COMBUSTIBLE?

Authority: 30 CFR 250.850
Enforcement Actions: C

IS EACH DIRECT FIRED TUBE-TYPE OR EXHAUST HEATED COMPONENT EQUIPPED WITH AN OPERABLE FSV IN EACH MEDIUM OUTLET PIPING?

Authority: 30 CFR 250.841
Enforcement Actions: C

IS EACH DIRECT FIRED TUBE-TYPE OR EXHAUST HEATED COMPONENT EQUIPPED WITH AN OPERABLE PSV IN EACH MEDIUM PIPING?

Authority: 30 CFR 250.841
Enforcement Actions: C

HAS THE OPERATOR REMOVED, INSPECTED, REPAIRED, OR REPLACED THE FIRE TUBE FOR TUBE TYPE HEATERS EVERY 5 YEARS?

Authority: 30 CFR 250.876
Enforcement Actions: W/C

Steam Generators

IS EACH STEAM GENERATOR EQUIPPED WITH AN OPERABLE PSH OR TSH?

Authority: 30 CFR 250.841
Enforcement Actions: C

IS EACH STEAM GENERATOR EQUIPPED WITH AN OPERABLE LSL?

Authority: 30 CFR 250.851(a)
Enforcement Actions: C

IS EACH STEAM GENERATOR EQUIPPED WITH AN OPERABLE WATER-FEEDING DEVICE WHICH WILL AUTOMATICALLY CONTROL THE WATER LEVEL IF OPERATING AT MORE THAN 15 PSIG?

Authority: 30 CFR 250.851(a)
Enforcement Actions: C
Heat Exchangers

P-550 IS EACH HEAT EXCHANGER (SHELL-TUBE) EQUIPPED WITH TWO OPERABLE PSH’S?
Authority: 30 CFR 250.841 Enforcement Actions: C

P-551 IS EACH HEAT EXCHANGER (SHELL-TUBE) EQUIPPED WITH TWO OPERABLE PSL’S?
Authority: 30 CFR 250.841 Enforcement Actions: C

Compressors

P-562 IS EACH COMPRESSOR SUCTION AND INTER-STAGE SCRUBBER EQUIPPED WITH AN OPERABLE LSH?
Authority: 30 CFR 250.858(a)(1) Enforcement Actions: C

P-563 IS EACH COMPRESSOR SUCTION AND INTER-STAGE SCRUBBER EQUIPPED WITH AN OPERABLE LSL?
Authority: 30 CFR 250.858(a)(1) Enforcement Actions: C

P-567 IS EACH FINAL STAGE DISCHARGE EQUIPPED WITH A FSV OUTSIDE OF BUILDING?
Authority: 30 CFR 250.841 Enforcement Actions: C

P-569 IS EACH FINAL STAGE DISCHARGE EQUIPPED WITH AN AUTOMATIC BDV IF 1000 HP OR GREATER?
Authority: 30 CFR 250.858(a)(4) Enforcement Actions: C

P-570 IS EACH COMPRESSOR CYLINDER OR CASE PROTECTED BY A TSH?
Authority: 30 CFR 250.858(a)(2) Enforcement Actions: C
**P-571**
DO THE AUTOMATIC SDV’S INSTALLED IN COMPRESSOR SUCTION AND FUEL GAS PIPING ACTUATED BY THE PSH, PSL, AND LSH INSTALLED ON THE COMPRESSOR SUCTION AND INTER-STAGE SCRUBBERS ALLOW EACH COMPRESSOR UNIT AND ASSOCIATED VESSELS TO BE ISOLATED FROM ALL INPUT SOURCES?

**Authority:** 30 CFR 250.858(a)(3)  
**Enforcement Actions:** C

**P-572**
IS EACH AUTOMATIC SDV INSTALLED IN COMPRESSOR SUCTION AND FUEL GAS PIPING ALSO ACTUATED BY THE SHUTDOWN OF THE PRIME MOVER?

**Authority:** 30 CFR 250.858(a)(3)  
**Enforcement Actions:** C

**P-573**
IS GAS-WELL GAS, AFFECTED BY THE CLOSURE OF THE AUTOMATIC SDV ON COMPRESSOR SUCTION, EITHER DIVERTED TO THE PIPELINE OR SHUT-IN AT THE WELLHEAD?

**Authority:** 30 CFR 250.858(a)(3)  
**Enforcement Actions:** C

**P-574**
IS THE PSH ON EACH COMPRESSOR SUCTION, INTER-STAGE SCRUBBER, AND FINAL STAGE DISCHARGE SET NO HIGHER THAN 15 PERCENT OR 5 PSI, WHICHERVER IS GREATER, ABOVE THE HIGHEST PRESSURE IN THE OPERATING RANGE AND AT LEAST 5 PERCENT OR 5 PSI, WHICHERVER IS GREATER, BELOW THE PSV’S ACTIVATION PRESSURE?

**Authority:** 30 CFR 250.858  
**Enforcement Actions:** C

**P-576**
IS THE PSL ON EACH COMPRESSOR SUCTION, INTER-STAGE SCRUBBER, AND FINAL STAGE DISCHARGE SET NO LOWER THAN 15 PERCENT OR 5 PSI, WHICHERVER IS GREATER, BELOW THE LOWEST PRESSURE IN THE OPERATING RANGE?

**Authority:** 30 CFR 250.858  
**Enforcement Actions:** C

**P-580**
IS EACH FLOATING PRODUCTION FACILITY EQUIPPED WITH AN AUTO SLEW (AS) SYSTEM?

**Authority:** 30 CFR 250.854(a)  
**Enforcement Actions:** C

**Turrets**
IS EACH FLOATING PRODUCTION FACILITY EQUIPPED WITH A SWIVEL STACK LEAK DETECTION SYSTEM?

Authority: 30 CFR 250.854(b)  
Enforcement Actions: C