



United States Department of the Interior  
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT  
WASHINGTON, DC 20240-0001

November 12, 2014

Memorandum

To: Susan Dwarnick, Panel Chair  
Douglas Morris, Director, Offshore Regulatory Programs  
Lars Herbst, Regional Director, GOMR

From: Brian Salerno, Director

I have reviewed the report of investigation into the incident that occurred October 27, 2013, on the Talos Energy, LLC owned "A" Platform of Vermillion Block 200 in the Gulf of Mexico, resulting in the death of a welder, Peter Jorge Voces.

Mr. Voces died after he fell overboard while engaged in cutting operations in preparation for facility dismantling and decommissioning. The Panel Report identifies a number of failures in the application of basic safety management practices which led to the death of Mr. Voces. In particular, the Panel found that "prep work" was not properly integrated into the work plans, that there was a lack of clear communications and understanding of the basic work instructions by workers, and a failure to implement the Safety and Environmental Management System (SEMS) bridging agreement between Talos/ERT and its contractor, Offshore Specialty Fabricators (OSF). Adherence to basic SEMS practices, at every stage of the operation, could have minimized the risk to workers and may have prevented the loss of life. These failures demonstrate how the lack of adherence to the basic tenants of the safety culture can lead to tragic results.

The panel's recommendations underscore the importance of incorporating the elements of a strong SEMS into every job on the facility, no matter how routine it may seem. The report also places needed attention on the importance of bridging documents between operators and their contactors. Safe operations at any facility require clear and consistent integration of all work activities, regardless of who is performing the work.

I agree with and accept the recommendations of the Panel. I am asking the Office of Offshore Regulatory Programs (OORP) to communicate those recommendations to the industry as part of the Bureau of Safety and Environmental Enforcement's (BSEE) ongoing dialog around the SEMS program.

I also agree with the panel's recommendations for the Bureau to examine areas for increased oversight of decommissioning and abandonment operations. I will ask OORP, working with the Region Directors to:

- Assess whether the Agency's regulations should be modified to require that a professional engineer approve the work plans for decommissioning and abandonment

operations or be onsite whenever structural support members are cut during decommissioning activities.

- Review regulations related to decommissioning and industry best practices to determine whether they are sufficiently robust to prevent a similar event from occurring in the future.
- Review existing regulations and industry standards involving bridging documents to determine if they provide adequate guidance, including expectations for communication and implementation to operators, contractors, and subcontractors. If appropriate, propose revisions to BSEE's regulations or industry standards.
- Perform a complete reassessment of how safety management system requirements are being applied to contractors involved in critical or higher risk operations, including but not limited to, drilling, completion, and decommissioning activities. This assessment should address the following questions:
  - Should primary contractors be required to have an accredited and audited SEMS program in place before being authorized to conduct higher risk or critical operations?
  - Should SEMS regulations be modified to apply to contractors?
  - What type of BSEE review or third party review should be conducted to ensure that specialized operations such as decommissioning activities are completely addressed by a safety management plan?
  - Should this type of review be incorporated into the permit review process?

This assessment should solicit input from a broad range of interested parties through the proposed Advance Notice of Proposed Rule Making on SEMS and, if appropriate, through public forums held by the Ocean Energy Safety Institute or the Center for Offshore Safety. A final report, including any recommendations, should be submitted to me within nine months of this letter.

Again, I thank you and the panel members for your work on this investigation.