

SAFETY ALERT



Safety Alert No. 412
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Failure to Follow Procedures Result in Pollution Incidents

On July 9, 2020, a pollution incident occurred during well workover operations. A BSEE investigation found that a total of 57 barrels of synthetic oil base for drilling fluids spilled into the Gulf of Mexico (GOM) during riser displacement. The standpipe gate valve and bleed-off valve were left in the open position during the pump operation. The valves' status was considered to be normally closed by personnel and assumed to be in the closed position. Personnel did not physically check these valves during line-up verification prior to startup.

On November 16, 2020, a pollution incident occurred during fluid transfer operations. After abandonment operations, personnel cleaned the mud pits and left the reserve pit, desander, desilter, and degasser valves in the open position. After tour change, and without checking valve status, the crew started to transfer Synthetic Based Mud (SBM) from an offshore Supply Vessel to the mud pits. Approximately 458 barrels of SBM inadvertently discharged into the GOM due to the open valves. This incident is currently under investigation, but preliminary information shows operations procedures were not followed.

Therefore, the BSEE recommends that operators and contractors:

- Ensure the flow path of the fluid transfer systems are thoroughly understood by personnel when conducting pipe/valve verification.
- Physically label fluid transfer system valves to help identify if they are in the correct position prior to startup.
- Ensure the proper procedures are followed, while including duties and responsibilities of the personnel involved.
- Follow Lock Out/Tag Out (LOTO) policy to establish physical barriers for overboard specific mud system components.
- Review [Safety Alert 224](#) and [Safety Alert 292](#) that also discussed similar incidents.

A **Safety Alert** is a tool used by BSEE to inform the offshore oil and gas industry of the circumstances surrounding a potential safety issue. It also contains recommendations that could assist avoiding potential incidents on the Outer Continental Shelf.

Category: Spill/Pollution

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