BSEE Identifies Improvements to Hurricane Preparedness During Risk Based Inspections

In June 2020, the Bureau of Safety and Environmental Enforcement (BSEE) reviewed the hurricane plans and preparations of five offshore operators accounting for 59% of manned facilities in the Gulf of Mexico. In conjunction with the hurricane/tropical storm season, these evaluations were initiated in response to concerns in previous years about personnel remaining on offshore facilities during unsafe weather conditions. In May 2020, the National Oceanic and Atmospheric Administration predicted that the 2020 Atlantic hurricane season would be more severe than normal, and the season is already on record pace for frequency.

All assessed operators had executed hurricane preparedness plans. However, areas for improvement were identified in decision-making processes and communication protocols. Therefore, BSEE recommends that operators and contractors consider the following:

- Prior to each hurricane season, complete the following:
  - Review hurricane preparedness and emergency evacuation plans to ensure they are accurate and up to date;
  - Update all personnel rosters, emergency contact information, and facility lists;
- Verify contact information for pipeline companies, support services and government representatives;
- Distribute updated documents to all field locations and shorebases; and,
- Verify that enough tie-down supplies are available to secure loose items stored on decks.

- Cover emergency response and rescue plans at pre-tour meetings offshore during hurricane season (June 1 to November 30), and notify BSEE if offshore inspection and testing requirements cannot be met due to weather-related interruptions;

- If personnel must evacuate a facility, complete the following before departure:
  - Drain piping, vessels and storage tanks to the lowest levels;
  - Remove or secure all loose items on deck;
  - Take hard copies of important documents that are not available onshore (e.g. stability reports, morning reports, red-line drawings, LOTO documentation, bypass logs); and,
  - Notify BSEE that production for the facility has been shut in.

- Conduct regular drills and tests of your hurricane preparedness plans, including scenarios where the primary means of communication are hindered;

- Review post-storm assessment forms to ensure that they are consistent and capture all information required to make determinations of facility status/condition;

- Develop procedures and checklists for safe boarding prior to re-manning facilities with potential storm damage. Personnel conducting these damage assessments should not work alone;

- Prepare for medical evacuation flights to be severely delayed or not available during hurricanes or bad weather. Facilities that lack onsite medical personnel should consider training offshore personnel in Advanced Life Support care;

- Develop procedures for personnel to safely shelter-in-place and review the recommendations in Safety Alert 363, which addresses related hazards;

- Consider installing video cameras on floating facilities to observe the stability conditions prior to boarding;

- Evaluate facilities per Section 17 of API Recommended Practice 2A-WSD, Planning, Designing, and Constructing Fixed Offshore Platforms—Working Stress Design, as required by 30 CFR 250.920, to identify any factors that would prohibit the facility from being manned during a hurricane or tropical storm;

- Ensure all BSEE hurricane-related Notice to Lessees are reviewed and followed as necessary; and,

- Consider using drone technology to investigate platforms prior to boarding.

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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.