

**Safety Bulletin No. 016**  
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## **Operator Fails to Ensure Contractor Adheres to Imperative Regulations Regarding BOP Testing**

There have been multiple instances across the Gulf of Mexico in which operators have failed to properly test blowout preventers (BOPs) in accordance with 30 CFR 250.737. The most recent occurrence, Jan. 14, 2019, resulted in BSEE representatives issuing multiple incidents of non-compliance (INCs) to an operator during a hydraulic workover (HWO) operation. BSEE inspectors determined that the operator and HWO contractors failed to have sufficient knowledge regarding important BOP testing requirements.

During the inspection of BOP test records, it was discovered that the operator failed to alternate testing stations on two consecutive BOP tests. As a result, BSEE issued the operator a B285 INC, as authorized by 30 CFR 250.737(d)(5). That regulation states that you must “For two complete BOP stations: (A) Designate a primary and secondary station, and both stations must be function-tested weekly; (B) The control station used for the pressure test must be alternated between pressure tests; and (C) For a subsea BOP, the pods must be rotated between control stations during weekly function testing and 14 day pressure testing.”

Furthermore, during the same inspection, BSEE inspectors determined that the operator failed to function test BOPs within the 7-day requirement. As a result, BSEE issued the operator a B385 INC, as authorized by 30 CFR 250.737(d)(9). The regulation states, “Function test annular and pipe/variable bore ram BOPs every 7 days between pressure tests.”

### **Therefore, BSEE recommends that operators consider the following:**

- Establish and maintain a contractor management system for reviewing all applicable requirements prior to startup of operations.
- Ensure rig crews and compliance personnel are knowledgeable of BOP regulations associated with **all** well operations.
- Conduct contractor competency assessments on a periodic basis as an additional measure for confirming that all personnel are aware of pertinent regulations.
- Update procedures to include all BOP testing requirements.
- Verify that your SEMS Program includes a process that accounts for the tracking, monitoring, and closure of action items developed as a result of INCs and incidents.

A **Safety Bulletin** is a tool used by BSEE to share the lessons learned from an incident or a near miss. It also contains recommendations that should help prevent the recurrence of such an incident on the Outer Continental Shelf.