



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

AUG 29 2018

Memorandum

To: Harold "Butch" Griffin, Panel Chair
Lars Herbst, Gulf of Mexico Regional Director
Doug Morris, Chief, Office of Offshore Regulatory Programs

From: Scott A. Angelle, Director

Subject: Review of Panel Report for Grand Isle Block 115

I have reviewed the Panel report *Investigation of November 12, 2016 Fire with Multiple Injuries, Leases OCS-30206, Grand Isle Area – Block 115*. The report presented a number of findings and conclusions arising from the work being done to eliminate an emulsion pad that had formed in the heater treater during production operations. I thank the Panel for its work, accept the report and am directing that follow-up actions be taken in response to the Panel findings.

The Panel's recommendations underscore the importance of placing safety first in every job being undertaken on a facility – no matter how routine. The report also draws attention to the importance of having up-to-date hazard analyses and associated work permits. Finally, given the significant burn injuries the personnel sustained, the report shows just how important proper protective personnel equipment (PPE) is during day to day operations.

It is my understanding that the following actions have been completed.

1. A SEMS evaluation of the Grand Isle 115 facility has been completed based on recommendation of the Panel.
2. A Safety Bulletin regarding correct usage of PPE has been prepared based on recommendation of the Panel.
3. The Notice to Lessees (NTL) regarding Incident and Oil Spill Reports is undergoing an update which includes a clarification of the "explosion" definition based on a recommendation of the Panel.
4. The task to develop training for BSEE inspection staff covering inspection observations of possible vulnerabilities from fabrication or assembly of fired vessels has been assigned to BSEE Gulf of Mexico Regional staff based on a recommendation of the Panel.

I request a status update for the above Items 3. and 4. within 30 days of the issuance of this memorandum and on a regular basis until the items are completed.

I am directing the Office of Offshore Regulatory Programs, working with the Regional Directors to:

- Issue a Safety Bulletin to inform industry regarding the most significant findings of the Panel investigation and provide recommendations for preventing a similar incident from occurring.
- Undertake a review of 30 CFR 250 to determine whether BSEE should consider incorporating by reference industry standards governing the design, installation, maintenance, and operation of fired vessels and/or atmospheric tanks into 30 CFR 250, to include relevant sections of API STD 2000.

I request that a work plan for these directed actions be provided to me within 30 days of this memorandum. I also request that the Chief, Safety and Incident Investigations Division be provided the work plan as she is required to provide me with regular updates regarding the Panel's recommendations.

Please contact me if you have any questions regarding what actions need to be taken based on the report. I would again like to thank the Panel for its effort in investigating this serious incident and for developing this report.

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