

UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT  
GULF OF MEXICO REGION

ACCIDENT INVESTIGATION REPORT

For Public Release

1. OCCURRED

DATE: 23-FEB-2018 TIME: 0645 HOURS

2. OPERATOR: Energy Resource Technology GOM

REPRESENTATIVE:

TELEPHONE:

CONTRACTOR:

REPRESENTATIVE:

TELEPHONE:

- STRUCTURAL DAMAGE
- CRANE
- OTHER LIFTING
- DAMAGED/DISABLED SAFETY SYS.
- INCIDENT >\$25K
- H2S/15MIN./20PPM
- REQUIRED MUSTER
- SHUTDOWN FROM GAS RELEASE
- OTHER

3. OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVISOR ON SITE AT TIME OF INCIDENT: 8. OPERATION:

4. LEASE: G01023

AREA: SS LATITUDE: 28.456782  
BLOCK: 224 LONGITUDE: -91.314356

5. PLATFORM: D

RIG NAME:

- PRODUCTION
- DRILLING
- WORKOVER
- COMPLETION
- HELICOPTER
- MOTOR VESSEL
- PIPELINE SEGMENT NO.
- OTHER

6. ACTIVITY:  EXPLORATION(POE)  
 DEVELOPMENT/PRODUCTION (DOCD/POD)

7. TYPE:

- HISTORIC INJURY
  - REQUIRED EVACUATION
  - LTA (1-3 days)
  - LTA (>3 days)
  - RW/JT (1-3 days)
  - RW/JT (>3 days)
  - Other Injury

- FATALITY
- POLLUTION
- FIRE
- EXPLOSION

- LWC  HISTORIC BLOWOUT
- UNDERGROUND
  - SURFACE
  - DEVERTER
  - SURFACE EQUIPMENT FAILURE OR PROCEDURES

COLLISION  HISTORIC  >\$25K  <=\$25K

9. CAUSE:
- EQUIPMENT FAILURE
  - HUMAN ERROR
  - EXTERNAL DAMAGE
  - SLIP/TRIP/FALL
  - WEATHER RELATED
  - LEAK
  - UPSET H2O TREATING
  - OVERBOARD DRILLING FLUID
  - OTHER \_\_\_\_\_

10. WATER DEPTH: 156 FT.
11. DISTANCE FROM SHORE: 46 MI.
12. WIND DIRECTION:  
SPEED: M.P.H.
13. CURRENT DIRECTION:  
SPEED: M.P.H.
14. SEA STATE: FT.
15. PICTURES TAKEN:
16. STATEMENT TAKEN:

17. INVESTIGATION FINDINGS:

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On February 23, 2018, an incident occurred on the Ship Shoal (SS) Block 224-D platform, Lease Number OCS-G 01023. The Designated Operator of Record is Energy Resource Technology GOM, LLC.

On February 22, 2018, after completing offloading operations from the field boat, the operators and construction crew departed the SS 224-D platform for the evening and returned to SS 224-A structure. On the next day, February 23, 2018, the operators and construction crew returned to the SS 224-D structure at 6:45 a.m. and saw oil coming from the overboard water discharge line of the Sump Tank (ABH-1000) to the Gulf waters. The operators boarded the platform and activated the Emergency Shutdown (ESD). After surveying the situation, the operators discovered that the manual dump valve for the Fuel Gas (F/G) Scrubber (MBF-2020) was left in the open position overnight. The platform receives its supply gas from the Departing Pipeline (KAH-3000) that feeds directly to the F/G Scrubber. The oil and gas flow continued unchecked directly to the sump tank and eventually down the sump's overboard water discharge line.

When the BSEE Houma District inspectors arrived at the platform, they noticed that the sump tank Level Safety High (LSH) was inoperable due to oil contamination in the F/G supply system. This contamination prevented the LSH from shutting in the platform. The inspectors issued two Incidents of Non-Compliance: a E-100 for pollution and a G-110 for unsafe workmanlike practice.

18. LIST THE PROBABLE CAUSE(S) OF ACCIDENT:

The probable cause of this incident was the F/G Scrubber's manual dump valve being left in the open position overnight.

19. LIST THE CONTRIBUTING CAUSE(S) OF ACCIDENT:

Oil contamination in the platform supply system prevented the Sump Tank LSH from shutting in the platform.

20. LIST THE ADDITIONAL INFORMATION:

The operator's initial report of the oil spill was 11.9 barrels. After recalculating, the corrected amount of oil released was 4.7 barrels.

21. PROPERTY DAMAGED:

NATURE OF DAMAGE:

N/A

N/A

ESTIMATED AMOUNT (TOTAL):

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

The Houma District Office has no recommendation for the Regional Office.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: YES

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

BSEE Houma District Inspectors issued two Incidents of Non-Compliance:

1. E-100 W Pollution - "At the time of inspection pollution occurred from the overboard water of sump ABH 1000. The pollution event occurred due to the manual dump valve on fuel gas scrubber MBF 2020 being left open. MBF 2020 dumps directly to the sump. This allowed oil to flow form the scrubber MBF 2020 and out the overboard water outlet of the sump ABH 1000."

2. G-110 W Unsafe Workmanlike Operations - "At the time of inspection the operator failed

to work in a safe workman like manner and provide for the preservation and conservation of property and the environment. The manual dump valve on MBF 2020, which dumps directly into the sump ABH 1000, was left open. The LSH on sump failed to shut in platform which led to a pollution event."

25. DATE OF ONSITE INVESTIGATION:

23-FEB-2018

26. INVESTIGATION TEAM MEMBERS:

Mark Chauvin / David Benoit / James Hamilton /

28. ACCIDENT INVESTIGATION

PANEL FORMED: NO

OCS REPORT:

29. DISTRICT SUPERVISOR:

Bryan Domangue

APPROVED

DATE: 31-MAY-2018

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