1. OCCURRED
   DATE: 23- FEB - 2018  TIME: 0645  HOURS
   OCCURRED DATE: TIME:

2. OPERATOR: Energy Resource Technology GOM
   REPRESENTATIVE: TELEPHONE:
   CONTRACTOR: REPRESENTATIVE: TELEPHONE:

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

4. LEASE: G01023
   AREA: SS LATITUDE: 28.456782
   BLOCK: 224 LONGITUDE: -91.314356

5. PLATFORM: D  RIG NAME:

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

7. TYPE:
   PRODUCTION
   DRILLING
   WORKOVER
   COMPLETION
   HELICOPTER
   MOTOR VESSEL
   PIPELINE SEGMENT NO.
   OTHER

8. OPERATION:
   PRODUCTION
   DRILLING

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:
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.

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

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

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.

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

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 from 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 /