

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: 24-JAN-2020 TIME: 1900 HOURS

2. OPERATOR: Energy XXI GOM, LLC

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 **Material Lost Overboard**

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

8. OPERATION:

4. LEASE: 00026

AREA: WD LATITUDE:

BLOCK: 30 LONGITUDE:

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

5. PLATFORM: P

RIG NAME:

6. ACTIVITY:

- EXPLORATION(POE)
- DEVELOPMENT/PRODUCTION (DOCD/POD)

9. CAUSE:

7. TYPE:

INJURIES:

HISTORIC INJURY

OPERATOR CONTRACTOR

REQUIRED EVACUATION

LTA (1-3 days)

LTA (>3 days)

RW/JT (1-3 days)

RW/JT (>3 days)

FATALITY

Other Injury

- EQUIPMENT FAILURE
- HUMAN ERROR
- EXTERNAL DAMAGE
- SLIP/TRIP/FALL
- WEATHER RELATED
- LEAK
- UPSET H2O TREATING
- OVERBOARD DRILLING FLUID
- OTHER _____

POLLUTION

FIRE

EXPLOSION

LWC HISTORIC BLOWOUT

UNDERGROUND

SURFACE

DEVERTER

SURFACE EQUIPMENT FAILURE OR PROCEDURES

10. WATER DEPTH: 43 FT.

11. DISTANCE FROM SHORE: 8 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:

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

On 24 January 2020, at 1900 hrs, an incident of a dropped object into the Gulf of Mexico occurred at Cox Operating LLC West Delta 30-P OCS 00026 platform.

On 07 January 2020, two Bureau of Safety and Environmental Enforcement (BSEE) inspectors conducted an annual inspection on the WD 30-P platform. During the Inspectors' safety walkthrough, there were areas of concern observed on the platform. The Inspectors instructed that the operators barricade off the well bay area and the concrete stairway from the cellar deck, due to heavily corroded cross members. Inspectors conveyed to the operators that the concrete stairway must be repaired or replaced. Those areas were considered unsafe due the potential of falling debris. The inspectors issued two Incidents of Noncompliance to Cox Operating LLC to have the areas of concern addressed.

On 13 January 2020, the construction crew consisting of two Fugro employees, two-GSSI employees, eight Burner Control employees and five- Alliance employees boarded the lift boat traveling to the Cox Operating WD-30P platform. Cox Operating hired the 3rd party companies to repair the corroded areas written up by BSEE inspectors on 07 January 2020. Once the lift boat arrived at the platform, it set-up in position and the crew members started offloading equipment and materials needed for the job. The crew members surveyed the job site and documented the production equipment layout before completing a Job Safety Analysis (JSA).

From 14 January 2020 to 28 January 2020, the crews held a daily safety meeting every morning at 6:00 am, discussing the job task for that day. Cox Operating had one production operator onboard as the person in charge (PIC). The construction crew members staged equipment and erected scaffolds and barricades to start the job task of replacing corroded handrails, stairways and deck grating in the well bay.

On 24 January 2020, the construction crew members started removing the cement stairway located on the northeast side of the cellar deck. As the crew members prepared the rigging for the stairway, the supervisor instructed them not to rig up all of the nylon straps until the last cut. The supervisor felt that the nylon straps would burn during the cutting process. As the crew members were making the third cut, the steps broke loose. A section of the stairwell 5 ft 6 in X 4 ft 9 in fell 30 ft down into water on the side of the platform. The crew members reported the incident to the Cox Operating PIC onboard at the time of the incident.

On 31 January 2020, Cox Operating LLC reported materials lost overboard during construction work on the WD 30-P platform to the New Orleans District office.

BSEE Investigation:

The incident went unreported by Cox Operating LLC until 31 January 2020, an individual reported the incident to the National Response Center (NRC) on 25 January 2020. The BSEE Houma District office followed up with the individual who reported the incident that occurred at WD 30-P platform.

On 02 February 2020, a team consisting of two BSEE Investigators performed an onsite investigation. The BSEE team interviewed multiple personnel, took photographs, and collected documents. The crew that performed the work was not available for interviews. The team conducted a hazard assessment inspection of the area mentioned in the NRC report.

The BSEE New Orleans District office requested Cox Operating LLC to survey the sea floor to confirm the stairway and other materials lost overboard during the

construction work. On 24 February 2020, Cox Operating conducted a sonar site investigation to locate the dropped stairway. The purpose of the survey was to scan the seafloor for any irregularities, significant features, or dropped objects within a 225' radius of Wd 30-P platform. The sonar is only capable of detecting features on or above the seafloor. The sonar detected the lift boat pad impressions and debris located on the west, north, east and south sides of the platform. Unfortunately, the stairway had broken into pieces, making it hard to differentiate the debris from other objects on the seafloor. Cox Operating did not send a dive team to investigate unknown objects on the seafloor based on little evidence from the sonar scan.

Conclusion:

The BSEE concluded the investigation with multiple failures. First, Cox Operating LLC did not conduct construction operations in a safe and workman like manner. Secondly, crew members missed critical steps in the sequence of basic job steps in the JSAs dated January 24-25, 2020. This includes the crew members not initiating "Stop Work Authority" once the stairway was found corroded before making the final cut. There was no stop work authority used at any point during the job process documented. Next, the crew members did not properly secure the stairway during welding and cutting operations. Lastly, the crew members failed to regroup by initiating a plan to safely secure the stairway to preventing it of becoming falling debris. Cox Operating LLC did not notify the New Orleans District office of an incident until well after the fact.

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

- Equipment Failure - Inadequate/improper tool:
- Human Performance Error - Not aware of hazards:

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

- Supervision - Inattention to worker safety concerns: The crew members did not properly secure the stairway during welding and cutting operations.
- Human Performance Error - Inattention to task: The crew members failed to regroup by initiating a plan to safely secure the stairway, preventing it from becoming falling debris.
- Management Systems - No or inadequate "Stop Work" procedures: The crew members did not initiate "Stop Work Authority" once the stairway was found corroded before making the final cut.

20. LIST THE ADDITIONAL INFORMATION:

21. PROPERTY DAMAGED:

NATURE OF DAMAGE:

N/A

N/A

ESTIMATED AMOUNT (TOTAL):

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

The BSEE New Orleans District makes no recommendations to the Office of Incident Investigation.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: **YES**

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

G-110-C Does the lessee perform all operations in a safe and workmanlike manner and provide for the preservation and conservation of property and the environment: At the time of the incident that occurred on 25 January 2020, at 1900 hours. Cox Operating failed to conduct construction operations in a workmanlike manner by not using the best available and safest technologies (BAST).

E-108-S Is the lessee preventing the disposal of equipment, cables, chains, containers, or other materials into offshore waters: Cox Operating failed to secure the stairwell section located on the north east cellar deck. The stairway was not rig up and secured to prevent it from falling into the Gulf of Mexico offshore. not recovered.

G-132-W Has the District Manager been verbally notified immediately following incident: Cox Operating failed to notify the BSEE New Orleans District Office to report an incident.

25. DATE OF ONSITE INVESTIGATION:

02-FEB-2020

28. ACCIDENT CLASSIFICATION:

29. ACCIDENT INVESTIGATION
PANEL FORMED: **NO**

26. INVESTIGATION TEAM MEMBERS:

**Pierre Lanoix (AI Specialist) / Derick
Lewis (Production Inspector) /**

OCS REPORT:

30. DISTRICT SUPERVISOR:

27. OPERATOR REPORT ON FILE:

David Trocquet

APPROVED

DATE: **15-JUN-2020**