

Please review the following major proposed additions, revisions and deletions to the national pinc list for field and office PINCS. All the proposed additions and revisions are highlighted in blue in the PINCs Listed below and the proposed deletions are highlighted in red. The major additions, revisions and deletions are listed below in the text of this message.

However there are also some minor additions, deletions and revisions listed with in the PINC word files listed at the bottom of this E-mail. The following old INSPECTION FORM instructions in the field and office PINCs in the introduction section of both documents, they have been changed to read INSPECTION COUNT/ INC COUNT AT THE BOTTOM OF EACH AND EVERY PINC to reflect the proper method to count field inspection items / office audit items and instructions for how many INCs to issue per PINC. Many of these have been revised. All the Inspection Count/INC Count proposed additions and revisions are highlighted in blue at the bottom of each field and office PINC.

We request that for all safety device testing PINC's we add the Authority 804(b). This would ensure that when we write an INC for not having the paperwork "at the time of the inspection" we have the proper authority to write that type of INC.

G-808 & G-809 - Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

This makes no sense - we are suppose to shut-in something whose shut-in will affect the overall safety of the facility.

P-315 - Issue a warning (W) INC when a review of records does not verify that the electronic PSL has been tested at the required interval, but the PSH has been tested in the last 120 days.

Issue a component shut-in (C) INC for the component protected by the PSL when a review of records does not verify that the PSH has been tested at the required interval and the PSH has not been tested in the last 120 days.

I believe that all of these should read PSL.

E-811 & E-812 - Call for INC's to be issued to operators in State Waters. Do all operators in state waters have to comply with federal requirements to respond to INC's? Do we even know all such operators in order to conduct these audits?

There are many incorrectly spelled words throughout the proposed PINCs.

M-130, should read: *"issue one INC for each allocation meter measuring **"more"** than 50 barrels of oil **per day** inspected"*. The proposed PINC's left out the words" per day"

M-131, should read: " issue *one INC for each allocation meter measuring **"less"** than 50 barrels of oil **per day** inspected"*. The proposed PINC's did not change the word "more", the wording needs to be "less" and also add the words "per day"

H-113, should read: *"first-aid kit inspected"*. The PINC's that were sent to us today did not have the word "kit" in the language, the word "kit" absolutely needs to be there.

In W-133, the word "dual" should be used in place of "duel".

In M-140, the word "inoperative" should be used in place of "inoperating".

In Z-125, The new section should read "...all work decks over 400 square feet in area and more than 20 feet..."

PROPOSED PINCS, NEW, REVISED AND DELETIONS

PROPOSED/NEW FIELD PINC

MATERIAL HANDLING

- I-190 IS ALL MATERIAL-HANDLING EQUIPMENT OPERATED AND MAINTAINED IN A MANNER THAT ENSURES SAFE OPERATIONS AND PREVENTS POLLUTION?
- Authority 30 CFR 250.108(f)** **Enforcement Action C**
- INSPECTION PROCEDURE:**
- 1) Verify that material handling equipment is operated and maintained in a safe and pollution free manner.
 - 2) Inspect records to ensure material handling equipment is operated per manufacturers and/or operators specifications.
- IF NONCOMPLIANCE EXISTS:**
Issue a component shut-in (C) INC when;
- 1) Material handling equipment is not operated and maintained in a safe manner.
 - 2) Material handling equipment is not operated and maintained in a pollution free manner.
- INSPECTION COUNT AND INC COUNT:**
Enter one item checked / issue one INC for facility inspected.
- NOTE -** Material handling equipment includes, but is not limited to; air hoists, hoists, tugger, air tugger, winch, man-riding winch, come-a-long, monorail, gantry crane, jib

PROPOSED/NEW FIELD PINC **DIVERTER**

- D-317 IS THE DIVERTER SYSTEM DESIGNED, INSTALLED, USED, MAINTAINED AND TESTED TO ENSURE PROPER DIVERSION OF GASES, WATER, DRILLING FLUIDS AND OTHE MATERIALS AWAY FROM FACILITIES AND PERSONNEL BEFORE DRILLING CONDUCTOR OR SURFACE HOLE.
- Authority: 30 CFR 250.430** **Enforcement Action:S**
30 CFR 250.198
- INSPECTION PROCEDURE:**
1. Verify that the Diverter actuating system which is installed is in compliance with that which has been approved.
 2. Verify that the accumulator system provides sufficient capacity to close a diverter system that is installed before drilling conductor or surface hole.
 3. Witness the proper automatic operation of the charging system.
 4. Check the system for leaks.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when an operable accumulator system of sufficient capacity is not installed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked / issue one INC per Diverter system inspected.

PROPOSED/NEW FIELD PINC
WELL WORKOVER

W-133

DOES THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE, A DUAL CHECK VALVE ASSEMBLY, CHOKE AND KILL VALVES WITH EQUAL OR GREATER WORKING PRESSURE THEN THE CONNECTION TO WHICH THEY ARE ATTACHED AND ARE ALL CONNECTIONS FLANGED.

Authority: 615(e)(4)(5)(7)

Enforcement Action: C

INSPECTION PROCEDURE:

If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP system includes, as a minimum, a dual check valve assembly, choke and kill lines with equal or greater working pressure than the connection to which they are attached and are all connections flanged?

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the workover rig if the BOP system does not meet the above requirements.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP system inspected.

PROPOSED/NEW FIELD PINC
WELL COMPLETION

C-156

ARE ANNULAR AND RAM BOP'S FUNCTION TESTED EVERY 7 DAYS BETWEEN 14 DAY BOP PRESSURE TESTS?

**Authority: 30CFR 250.516(a)(2)
30CFR 250.516(d)(5)**

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Verify that annular and ram BOP's have been function tested between pressure tests.
2. Witness function test if performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if function test was not conducted, but subsequent function test was conducted.

Issue a rig shut-in (S) INC if annular and ram have not been function tested in the past 7 days.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per BOP system inspected.

PROPOSED/NEW OFFICE PINC

ARCHEOLOGICAL

G-808

DOES THE ARCHAEOLOGICAL REPORT SUGGEST THAT ARCHEOLOGICAL

RESOURCES MAY BE PRESENT AND IS THE LOCATION OF THE SITE OF ANY OPERATION LOCATED SO AS TO NOT ADVERSELY AFFECT THE AREA OF THE RESOURCE?

Authority: 30 CFR 250.194(a)(1)
30 CFR 250.194(c)
30 CFR 250.1010(c)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., EP's, DOCD's, DPP, etc.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked / issue one INC per audit.

G-809

DOES THE LESSEE'S DISCOVERY OF ANY ARCHAEOLOGICAL RESOURCES IN THE LEASE AREA IMMEDIATELY RESULT IN HALTING OPERATIONS AND TAKING STEPS TO PROTECT SIGNIFICANT

RESOURCES AND REPORTING THE DISCOVERY TO THE REGIONAL DIRECTOR?

Authority: 30 CFR 250.194(a)(1)
30 CFR 250.194(c)
30 CFR 250.1010(c)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., EP's, DOCD's, DPP, etc.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked / issue one INC per audit.

PROPOSED/NEW FIELD PINCS

PRODUCTION

P-209 **IS A FIRE DETECTION SYSTEM LOCATED IN ACCORDANCE WITH API RP 14 J APPENDIX B.1.1.2 FOR ELECTRIC MOTORS?**
Authority: 804(b)901(a)(10) **Enforcement Action:**

C

INSPECTION PROCEDURE:

Verify that each electric motor-driven hydrocarbon handling unit has a fire detection system located in accordance with API RP 14 J appendix B.1.1.2?

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if each electric-driven motor is not equipped a TSE located in accordance with API RP 14 J appendix B.1.1.

INSPECTION COUNT/ INC COUNT:

Enter one item checked / issue one INC per facility inspected.

P-314 **IS EACH ELECTRONIC PSH TESTED FOR OPERATION EVERY 3 MONTHS, WITH NO MORE THAN 120 DAYS ELAPSING BETWEEN TESTS?**

Authority: 804(a)(b)(4)(ii)(i)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Review operator records to verify that each electronic PSH has been tested every 3 months, but no more than 120 days have elapsed between tests.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when a review of records does not verify that the PSH has been tested at the required interval, but the PSH has been tested in the last 120 days.

Issue a component shut-in (C) INC for the component protected by the PSH when a review of records does not verify that the PSH has been tested at the required interval and the PSH has not been tested in the last 120 days.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility inspected.

P-315 **IS EACH ELECTRONIC PSL TESTED FOR OPERATION EVERY 3 MONTHS, WITH NO MORE THAN 120 DAYS ELAPSING BETWEEN TESTS.**

Authority: 804(a)(b)(4)(ii)(i)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Review operator records to verify that each electronic PSL has been tested every 3 months, but no more than 120 days have elapsed between tests.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when a review of records does not verify that the electronic PSL has been tested at the required interval, but the PSL has been tested in the last 120 days.

Issue a component shut-in (C) INC for the component protected by the PSL when a review of records does not verify that the PSL has been tested at the required interval and the PSL has not been tested in the last 120 days.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility inspected.

P-316 **IS EACH ELECTRONIC LSH TESTED FOR OPERATION EVERY 3 MONTHS, WITH NO MORE THAN 120 DAYS ELAPSING BETWEEN TESTS?**

Authority: 804(a)(b)(4)(ii)(i)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Review operator records to verify that each electronic LSH has been tested every 3 months, but no more than 120 days have elapsed between tests.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when a review of records does not verify that the electronic LSH has been tested at the required interval, but the LSH has been tested in the last 120 days.

Issue a component shut-in (C) INC for the component protected by the LSH when a review of records does not verify that the LSH has been tested at the required interval and the LSH has not been tested in the last 120 days.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility inspected.

P-317

IS EACH ELECTRONIC LSL TESTED FOR OPERATION EVERY 3 MONTHS, WITH NO MORE THAN 120 DAYS ELAPSING BETWEEN TESTS?

Authority: 804(a(b))(4)(ii)(i)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Review operator records to verify that each electronic LSL has been tested every 3 months, but no more than 120 days have elapsed between tests.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when a review of records does not verify that the electronic LSL has been tested at the required interval, but the LSL has been tested in the last 120 days.

Issue a component shut-in (C) INC for the component protected by the LSL when a review of records does not verify that the LSL has been tested at the required interval and the LSL has not been tested in the last 120 days

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility inspected.

EXISTING

APPENDIX 9

Last Update December 2005

TESTING PROCEDURE FOR SCSSV, TUBING PLUG, AND INJECTION VALVE

MAXIMUM ALLOWABLE LEAKAGE RATE

Gas - 5 cubic feet per minute

Liquid - 200 cubic centimeters per minute

Note:

1. The listed testing procedures are for wells that **do not produce H₂S**. For wells that produce H₂S, pressure must be bled into a closed system, such as pressure vessels or a flare system, using H₂S resistant material.
2. For SCSSV testing:
 - A. Use either Method A or Method B for normal wells for gas.
 - B. Use Method C for questionable wells or low pressure wells for gas.
 - C. Use Method E for liquid.
3. For pump-through plug or injection valve testing:
 - A. Use Method D for gas.
 - B. Use Method E for liquid.

Method A:

1. Shut-in the well at the wellhead.
2. Wait for a minimum 5 minutes and record SITP.
3. Bleed SCSSV hydraulic control line pressure to zero to shut-in SCSSV.
4. Bleed surface pressure sufficiently to establish a differential pressure across SCSSV of approximately 20 percent of the SITP recorded in Step 2.
5. Wait a minimum of 30 minutes and record surface pressure.
6. Surface pressure recorded in Step 5 confirms SCSSV holding integrity or the need to determine leakage rate addressed in Step 7.
7. Determine gas leakage rate using the following formula:

$$\text{Leakage rate (SCF/min)} = \frac{Cd^2h(p_2-p_1)}{T_{\text{TEST}}}$$

Where: C = 0.000363

d = Inside diameter of tubing in inches

h = Distance between valve and tree in feet

p₁ = Initial pressure reading in psi

p_2 = Final pressure reading in psi
 T_{TEST} = Time lapsed during test in minutes

Method B:

1. Shut-in the well at the wellhead.
2. Bleed SCSSV hydraulic control line pressure to zero to shut-in SCSSV.
3. Bleed surface pressure to ambient pressure.
4. Close bleed valve.
5. Attach Direct-Reading flowmeter.
6. Slowly open bleed valve and record gas leakage rate determined by flowmeter.
7. Close the bleed valve.
8. Remove the Direct-Reading flowmeter and return the SCSSV to service.

Method C:

1. Close the SCSSV to be tested.
2. Position valve(s) as required to permit pressure to bleed downstream of the SCSSV, and bleed downstream pressure.
3. Close the bleed valve.
4. Attach the inlet of the Direct-Reading flowmeter to the bleed valve using hose barb and plastic tubing and keep flowmeter in the vertical position.
5. With pressure on the upstream side of the SCSSV, slowly open the bleed valve downstream of the SCSSV and record the leakage rate.
6. If leakage occurs, verify that the SCSSV is actually leaking, and not the FSV, wing valve, or gas trapped in the crown valve.
7. Close the bleed valve.
8. Disconnect hose barb and plastic tubing from the bleed valve and return the SCSSV to service.

Method D:

1. Record SITP.
2. Bleed surface pressure sufficiently to establish a pressure differential across pump-through plug or injection valve of approximately 20 percent of the SITP recorded in Step 1.
3. Wait a minimum of 30 minutes and record surface pressure.
4. Surface pressure recorded in Step 3 confirms pump-through or injection valve holding integrity, or the need to determine leakage rate addressed in Step 5.
5. Determine gas leakage with the following formula:

$$\text{Leakage rate (SCF/min)} = \frac{Cd^2h(p_2-p_1)}{T_{\text{TEST}}}$$

Where: C = 0.000363

- d = Inside diameter of tubing in inches
- h = Distance between valve and tree in feet
- p₁ = Initial pressure reading in psi
- p₂ = Final pressure reading in psi
- T_{TEST} = Time lapsed during test in minutes

Method E:

For wells that contain no gas, determine leakage rate by capturing the leaking liquid in a measuring device.

**PROPOSED ADDITIONS & DELETIONS TO EXISTING
APPENDIX 9**

TESTING PROCEDURE FOR SCSSV, TUBING PLUG, AND INJECTION VALVE

Note: All these test methods shall meet or exceed the requirements set forth in the current incorporated edition of API RP 14B, Recommended Practice for Design, Installation, Repair and Operation of Subsurface Safety Valve Systems. The leakage rates are those set forth in Subpart H or in the approved DWOPs.

SURFACE MAXIMUM ALLOWABLE LEAKAGE RATE

Gas - 5 cubic feet per minute

Liquid - 200 cubic centimeters per minute

SUBSEA MAXIMUM ALLOWABLE LEAKAGE RATE

Gas - 15 cubic feet per minute
Liquid - 400 cubic centimeters per minute

Note:

1. The listed testing procedures are for wells that **do not produce H₂S**. For wells that produce H₂S, pressure must be bled into a closed system, such as pressure vessels or a flare system, using H₂S resistant material.
2. For SCSSV testing:
 - A. Use either Method A or Method B for normal wells for gas.
 - B. Use Method C for questionable wells or low pressure wells for gas.
 - C. Use Method E for liquid.
3. For pump-through plug or injection valve testing:
 - A. Use Method D for gas.
 - ~~B. Use Method E for liquid.~~

Method A:

1. Shut-in the well at the wellhead.
2. Wait an appropriate period of time **minimum 5 minutes** and record SITP.
3. Bleed SCSSV hydraulic control line pressure to zero to shut-in SCSSV. **Then observe pressure for build up.**
4. Bleed surface pressure sufficiently to establish a differential pressure across SCSSV. **of approximately 20 percent of the SITP recorded in Step 2.**
5. Wait an appropriate period of time **minimum of 30 minutes** and record surface pressure.
6. Surface pressure recorded in Step 5 confirms SCSSV holding integrity or the need to determine leakage rate addressed in Step 7.
7. Determine gas leakage rate using the following formula:

$$\text{Leakage rate (SCF/min)} = \frac{Cd^2h(p_2-p_1)}{T_{\text{TEST}}}$$

Where: C = 0.000363

d = Inside diameter of tubing in inches
h = Distance between valve and tree in feet
p₁ = Initial pressure reading in psi
p₂ = Final pressure reading in psi
T_{TEST} = Time lapsed during test in minutes

Method B:

1. Shut-in the well at the wellhead.
2. Bleed SCSSV hydraulic control line pressure to zero to shut-in SCSSV.
3. Bleed **surface tubing** pressure to ambient pressure.
4. Close bleed valve.
5. **Install a** Direct-Reading flowmeter.
6. Slowly open bleed **valve to a fully open position** and record gas leakage rate determined by flowmeter.
7. Close the bleed valve.
8. Remove the Direct-Reading flowmeter and return the SCSSV to service.

Method C:

- ~~1. Close the SCSSV to be tested.~~
- ~~2. Position valve(s) as required to permit pressure to bleed downstream of the SCSSV, and bleed downstream pressure.~~
- ~~3. Close the bleed valve.~~
- ~~4. Attach the inlet of the Direct-Reading flowmeter to the bleed valve using hose barb and plastic tubing and keep flowmeter in the vertical position.~~
- ~~5. With pressure on the upstream side of the SCSSV, slowly open the bleed valve downstream of the SCSSV and record the leakage rate.~~
- ~~6. If leakage occurs, verify that the SCSSV is actually leaking, and not the FSV, wing valve, or gas trapped in the crown valve.~~
- ~~7. Close the bleed valve.~~
- ~~8. Disconnect hose barb and plastic tubing from the bleed valve and return the SCSSV to service.~~

Method C: PUMP THROUGH PLUGS

1. Record SITP.
2. Bleed surface pressure sufficiently to establish a pressure differential across pump-through plug or injection valve of approximately 20 percent of the SITP recorded in Step 1.
3. Wait an appropriate amount of time **minimum of 30 minutes** and record surface pressure.
4. Surface pressure recorded in Step 3 confirms pump-through or injection valve holding integrity, or the need to determine leakage rate addressed in Step 5.
5. Determine gas leakage with the following formula:

$$\text{Leakage rate (SCF/min)} = \frac{Cd^2h(p_2-p_1)}{T_{\text{TEST}}}$$

Where: C = 0.000363

d = Inside diameter of tubing in inches

h = Distance between valve and tree in feet

p₁ = Initial pressure reading in psi

p₂ = Final pressure reading in psi

T_{TEST} = Time lapsed during test in minutes

Method E:-

NOTE:

For wells that contain no gas, determine leakage rate by capturing the leaking liquid in a measuring device.

PROPOSED/NEW FIELD PINC

POLLUTION

E-104 IS ALL HYDROCARBON HANDLING EQUIPMENT FOR TESTING AND PRODUCTION DESIGNED, INSTALLED AND OPERATED TO PREVENT POLLUTION?

Authority: 300(b)(3)

Enforcement Action: W/C/S

802(a)(b)(e)

INSPECTION PROCEDURE:

1. Inspect hydrocarbon handling equipment to verify that it is designed, installed and operated to prevent pollution. Maintenance or repairs which are necessary to prevent pollution of offshore waters shall be undertaken immediately.
2. Inspect hydrocarbon handling equipment that discharges produced water overboard and on final scrubbers in vent/flare systems to verify that they are operated in an automatic mode.

Note: Hydrocarbon handling equipment that discharges produced water overboard and final scrubbers in a vent/flare system shall automatically maintain the oil at a level to prevent discharge of oil into offshore waters.

IF NON COMPLIANCE EXISTS:

Issue a warning (W) INC if oil pumps and/or dump valves on hydrocarbon handling equipment that discharges produced water overboard and on final scrubbers in vent/flare systems are improperly maintained and pollution is not occurring.

Issue a component shut-in (C) INC when oil pumps and/or dump valves do not operate automatically to prevent the discharge of pollutants into offshore waters.

Issue a facility shut-in (S) INC when the hydrocarbon handling equipment is not properly designed, operated and maintained to prevent pollution incidents and the system cannot be corrected immediately

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility inspected.

PROPOSED REVISED OFFICE PINCS

TRAINING

EXISTING

- G-843** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?**
Authority: 30 CFR 250.1503(b)(1) Enforcement Action: W
INSPECTION PROCEDURE:
Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices.

PROPOSED

- G-843** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?**
Authority: 30 CFR 250.1503(b)(1) Enforcement Action: W
30 CFR 250.1507(a)
INSPECTION PROCEDURE:
1.) Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices.
2.) Verify that procedures are being followed by reviewing employee records.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices or documentation fails to support that the procedures are being implemented.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per training plan audited..

EXISTING

- G-845** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS?**
Authority: 30 CFR 250.1503(b)(4) Enforcement Action: W
INSPECTION PROCEDURE:
Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis.

PROPOSED

- G-845** **DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?**
Authority: 30 CFR 250.1503(b)(4) Enforcement Action: W
30 CFR 250.1507(a)
INSPECTION PROCEDURE:
1.) Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis.
2.) Verify through records review that the procedures are being implemented.
IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis or documentation fails to support that the procedures are being implemented.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited..

EXISTING

G-846

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS?

Authority: 30 CFR 250.1503(b)(2)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for evaluating the training programs of contractors.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors.

PROPOSED

G-846

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS AND IS THERE EVIDENCE THAT THE EVALUATIONS ARE BEING CONDUCTED AS PER THE PROCEDURES?

Authority: 30 CFR 250.1503(b)(2)
30 CFR 250.1507(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify

1.) Verify that lessee's training plan includes procedures for evaluating the training programs of contractors.

2.) Verify through records review that evaluations are being conducted as per the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors or documentation fails to indicate that the contractor evaluations are being conducted?

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited..

EXISTING

G-847

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS?

Authority: 30 CFR 250.1503(b)(6)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that lessee's training plan includes procedures for internal audits.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits.

PROPOSED

G-847

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS AND IS THERE EVIDENCE THAT THE INTERNAL AUDITS ARE BEING CONDUCTED AS PER PROCEDURES?

Authority: 30 CFR 250.1503(b)(6)
30 CFR 250.1507(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify

1.) Verify that lessee's training plan includes procedures for internal audits.

2.) Verify through records review that the internal audits are being conducted as per the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits or documentation fails to indicate that the internal audits are being conducted.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited..

EXISTING

G-848 DOES THE LESSEE PROVIDE A COPY OF ITS TRAINING PLAN WHEN REQUESTED BY THE MMS REGIONAL OR DISTRICT SUPERVISOR?

Authority: 30 CFR 250.1503(c)(2)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that a training plan was provided when requested by the MMS Regional or District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one facilities shut-in (S) INC for an audit of a lessee's training program if the lessee fails to provide the training plan when requested by the MMS Regional or District Supervisor.

Note: The one or more affected facilities is the facility.

PROPOSED

G-848 DOES THE LESSEE PROVIDE A COPY OF ITS TRAINING PLAN WHEN REQUESTED BY THE MMS REGIONAL OR DISTRICT SUPERVISOR?

Authority: 30 CFR 250.1503(c)(2)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that a training plan was provided when requested by the MMS Regional or District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one facilities shut-in (S) INC for an audit of a lessee's training program if the lessee fails to provide the training plan when requested by the MMS Regional or District Supervisor.

Note: The one or more affected facilities is the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited..

EXISTING

G-850 ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?

Authority: 30 CFR 250.1506(b) **Enforcement Action:** W

INSPECTION PROCEDURE:

Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.

PROPOSED

G-850 ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR

ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES AND IS THERE EVIDENCE INDICATING THAT THE KNOWLEDGE AND SKILLS ARE BEING VERIFIED?

Authority: 30 CFR 250.1506(b)
30 CFR 250.1507(a)

Enforcement Action: W

INSPECTION PROCEDURE:

1.) Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.

2.) Verify through records review that procedures are being followed.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties or documentation fails to indicate that procedures are being followed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

EXISTING

G-851

DOES CONTRACTOR'S TRAINING PROGRAM PROVIDE FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?

Authority: 30 CFR 250.1506(c)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a contractor's training plan if contractor's training program does not provide for periodic training and verification of well-control or production safety knowledge and skills.

PROPOSED

G-851

DOES THE LESSEE ENSURE (EITHER THROUGH THE CONTRACTOR EVALUATION OR OTHER METHOD THAT THE CONTRACTOR'S TRAINING PROGRAM PROVIDE FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?

Authority: 30 CFR 250.1506(c)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the lessee has ensured that contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the lessee has not insured either through the contractor evaluation or other method that the contractor's training plan if contractor's training program does not provide for periodic training and verification of well-control or production safety knowledge and skills.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

EXISTING

G-852

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES?

Authority: 30 CFR 250.1503(b)(3)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not

include procedures to verify that employees and contractor personnel, required to perform wellcontrol and production safety operations, can perform their assigned duties.

PROPOSED

G-852

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES AND IS THERE EVIDENCE THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL HAVE BEEN VERIFIED IN ACCORDANCE WITH THE PROCEDURES?

Authority: 30 CFR 250.1503(b)(3)
30 CFR 250.1507(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify

- 1.) Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties.
- 2.) Verify through records review that all employees and contractor personnel have been verified in accordance with the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform wellcontrol and production safety operations, can perform their assigned duties or documentation does not indicate that the verification procedures are being followed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

EXISTING

G-855

IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?

Authority: 30 CFR 250.1506(a) **Enforcement Action:** W/C

INSPECTION PROCEDURE:

1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
2. Verify that periodic training is provided to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

Issue one component shut-in (C) INC for each employee that is not provided periodic training to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.

Note: The employee is the component.

PROPOSED

G-855

IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?

Authority: 30 CFR 250.1506(a)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

2. Verify **through record reviews** that periodic training is **conducted** to ensure that employees maintain understanding of and competency in, well-control or production safety practices.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

Issue one component shut-in (C) INC for each employee that **has not received** is not provided periodic training **(in accordance with plan)** to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.

Note: The employee is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

EXISTING

G-857

DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN ~~OR~~ ORAL WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?

Authority: 30 CFR 250.1507(c)
30 CFR 250.1508(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that MMS or its authorized representative is allowed to administer written ~~or~~ oral tests at the lessee's work site or onshore location.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if MMS or its authorized representative is not allowed to administer written ~~or~~ oral tests at the lessee's work site or onshore location.

PROPOSED

G-857

DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN, ORAL, **HANDS-ON WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?**

Authority: 30 CFR 250.1507(c)
30 CFR 250.1508(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that MMS or its authorized representative is allowed to administer written, oral, **or hands-on** tests at the lessee's work site or onshore location.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if MMS or its authorized representative is not allowed to administer written, oral, **or hands-on** tests at the lessee's work site or onshore location.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

**Proposed PINC
ESD SYSTEM**

(Last update – March 2003)

D-130

IS AN OPERABLE ESD STATION LOCATED NEAR THE DRILLER'S CONSOLE ON PLATFORMS WHERE THERE ARE PRODUCING WELLS OR OTHER HYDROCARBON FLOW?

Authority: 406(a)

Enforcement Action: C

Note: The offshore operator and contractor should be advised that the ESD station at the driller's console **must** be tested when installed and subsequent to each rig skid for system operability. The ESD station should be tested to shut in one well during initial installation of

the ESD station and for system operability after the initial test. Furthermore The ESD station near the driller,s console shall be rotated and tested in order when testing other ESD stations on the platform.

INSPECTION PROCEDURE:

1. Verify that there is an ESD station near the driller’s console during drilling operations.
2. Verify operation of the ESD station by testing in accordance with Appendix 10.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for drilling operation when an ESD station:

1. Does not exist at the required location.
2. Does not operate properly.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC for each complex inspected.

Existing PINC

ESD SYSTEM
(Last update – March 2003)

D-130

IS AN OPERABLE ESD STATION LOCATED NEAR THE DRILLER’S CONSOLE ON PLATFORMS WHERE THERE ARE PRODUCING WELLS OR OTHER HYDROCARBON FLOW?

Authority: 406(a)

Enforcement Action: C

Note: The offshore operator and contractor should be advised that the ESD station at the driller’s console should be tested when installed and subsequent to each rig skid.

INSPECTION PROCEDURE:

1. Verify that there is an ESD station near the driller’s console during drilling operations.
2. Verify operation of the ESD station by testing in accordance with Appendix 10.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for drilling operation when an ESD station:

1. Does not exist at the required location.
2. Does not operate properly.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC for each complex inspected.

The following PINCS are recommendations made by the Oil Spill Prevention AMCR Team. They have recommended the deletions, additions and revisions listed below. As you can see they have deleting certain PINCS, Revising some and adding a couple of new PINCS.

PROPOSED PINC

E-100

IS THE OPERATOR PREVENTING UNAUTHORIZED DISCHARGE OF POLLUTANTS INTO OFFSHORE WATERS?

Authority:

250.107(a)

Enfo

- 250.132(a)
- 250.132.(b)
- 250.300(a)
- 250.300(b)(3)
- 254.2(a)
- 254.5(a)
- 254.5©

INSPECTION PROCEDURE:

Visually check the waters surrounding the facility when en route to, approaching, departing, or passing a facility by boat, helicopter, or fixed wing aircraft. Look for sheens, slicks, wastes, and other pollutants originating from the facility, risers, or pipelines. During the facility inspection, check the water for signs of any pollutants.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

The cause of the discharge has been identified and corrected prior to the inspection or observation, and no further pollution is occurring.

Issue a component shut-in (C) INC if:

A specific component has been determined to be the cause of pollution and the pollution is ongoing at the time of the inspection or observation.

Issue a facility shut-in (S) INC if:

More than one specific component has been determined to be the cause of the pollution and the pollution is ongoing at the time of the inspection or observation.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility .

EXISTING PINC

E-100

IS THE LESSEE PREVENTING POLLUTION OF OFFSHORE WATERS AND, IF POLLUTION IS DETECTED, HAS THE LESSEE REPORTED THE POLLUTION IN ACCORDANCE WITH 30 CFR 254.46?

**Authority: 300(a)
254.46**

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Visually check the waters surrounding the facility when approaching, leaving, or passing a facility by boat or helicopter. Observe the waters during the inspection tour. Look for sheens, slicks, waste, and other pollutants originating from the facility.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC:

1. For pollution or spills observed and the upset condition corrected prior to the inspection.
2. If the operator has not reported the pollution in accordance with 30 CFR 254.46.

Issue a component shut-in (C) INC for the specific component that has been determined to be the cause of pollution.

Issue a facility shut-in (S) INC when more than one specific component has been determined to be the cause of the pollution. Examples: Upset in the production process train that cannot be corrected immediately.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility .

PROPOSED PINC

E-120

ARE FACILITIES AND PIPELINES BEING INSPECTED FOR SIGNS OF POLLUTION, AND ARE RECORDS BEING MAINTAINED?

**Authority: 250.132(a)
250.132(b)
250.301(a)
250.1005(a)
254.2(a)**

Enforcement Action: W/S

INSPECTION PROCEDURE

Verify that:

1. Pollution inspections are being conducted at prescribed or approved intervals.
2. Weather conditions, e.g. fog, solid ice, that prevent pollution inspections are recorded in the inspection log.
3. Inspection records are being maintained for a two-year period at the facility or a nearby manned facility.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC when:

1. The pollution inspections are not being conducted as required.

2. The inspection records are not being maintained as required.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility .

EXISTING PINC

E-120

ARE RECORDS OF THE DAILY POLLUTION INSPECTIONS MAINTAINED AT THE FACILITY OR AT A NEARBY MANNED FACILITY FOR 2 YEARS?

Authority: 301(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Review the records of the facility pollution inspection to verify that:

1. It is conducted daily or another interval approved by the District Manager.
2. The records are maintained for a 2 year period.
3. The records are maintained at the facility or a nearby manned facility.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when:

1. The inspections are not conducted as required.
2. The records are not maintained as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility .

PROPOSED PINC

E-123

IS THE POLLUTION RESPONSE EQUIPMENT IDENTIFIED IN OIL SPILL RESPONSE PLAN LOCATED AT THE DESIGNATED SITE(S), TESTED, MAINTAINED, AND INSPECTED MONTHLY, AND ARE RECORDS BEING MAINTAINED?

Authority: 250.132(a)

Enforcement Action: W/S

250.132(b)

254.2(a)

254.5(a)

254.24(a)

254.40

254.42(e)

254.43(a)

254.43(b)

INSPECTION PROCEDURE

Inspect the storage sites designated in the Oil Spill Response Plan to verify that:

1. They contain the required response equipment.
2. The oil discharge response equipment is maintained for optimal performance.
3. Oil discharge response equipment is inspected on a monthly basis.
4. The oil discharge response equipment inspection and maintenance records are being maintained for a minimum of two years.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC when:

1. An onshore or offshore site does not contain the equipment listed in the Oil Spill Response Plan.
2. Records indicate the oil discharge response equipment is not inspected monthly.
3. The oil discharge response equipment is not being maintained for optimal performance.
4. Equipment inspection and maintenance records have not been maintained for two years

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility .

EXISTING PINCS BELOW E-121,122,123 To BE REPLACED BY E-123 ABOVE

E-121

ARE RECORDS OF THE MONTHLY POLLUTION RESPONSE EQUIPMENT INSPECTIONS KEPT FOR AT LEAST 2 YEARS AT A SITE DESIGNATED IN THE OIL SPILL RESPONSE PLAN?

Authority: 254.43(a)
254.43(b)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Review the latest approved Oil Spill Response Plan and identify the records storage site.
2. Review the records of the monthly pollution response equipment inspections to verify that:
 - A. The inspections are conducted monthly.
 - B. The records are maintained for a 2 year period.
 - C. The records are maintained at the site designated in the Oil Spill Response Plan.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when:

1. The inspections are not conducted as required.
2. The records are not maintained as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility .

E-122

IS THE POLLUTION RESPONSE EQUIPMENT IDENTIFIED IN THE OIL SPILL RESPONSE PLAN MAINTAINED IN ACCORDANCE WITH THE REQUIREMENTS IN THE PLAN?

Authority: 254.43(a)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Review the latest approved Oil Spill Response Plan and identify the pollution response equipment and its maintenance requirements.
2. Verify that the pollution response equipment is maintained in accordance with the requirements.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when the equipment is located onshore and is not being maintained as required.

Issue a facility shut-in (S) INC for the platform(s) serviced by the equipment when the equipment is located offshore and is not being maintained as required.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC for each inventory inspected.

E-123
OIL

ARE THE POLLUTION RESPONSE EQUIPMENT AND MATERIALS IDENTIFIED IN

SPILL RESPONSE PLAN LOCATED AT THE DESIGNATED SITE(S)?

Authority: 254.24(a)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Review the latest approved Oil Spill Response Plan and identify the required pollution response equipment and materials and the required storage sites.
2. Inspect the designated storage sites to verify that they contain the required equipment and materials.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when:

1. An onshore site does not contain the required equipment or materials.
2. An offshore site does not contain the required materials.

Issue a facility shut-in (S) INC for the platform(s) serviced by the required equipment when the site is located offshore and does not contain the required equipment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each site inspection.

E-130 & E-131 Merged into PINCS E-821 & E-822 listed below. E-132 Deleted

E-130 ARE THE RECORDS OF THE POLLUTION CONTROL EQUIPMENT TRAINING CLASS AVAILABLE?

Authority: 254.41

Enforcement Action: W

DEFINITION:

Records – Course-completion certificates issued by the organization providing the training.

INSPECTION PROCEDURE:

1. Review the latest approved Oil Spill Response Plan and identify members of the Oil Spill Response Team and the records storage site.
2. Review the pollution control equipment training class records to verify that:
 - A. A class was conducted in the last 12 months.
 - B. All the team members and alternates received hands-on training in deployment and operation of the equipment.
 - C. All the supervisory team members received training in supervising deployment and operation of the equipment.
 - D. They are maintained at the site designated in the Oil Spill Response Plan.
 - E. They include course-completion certificates or attendance records issued by the organization providing the training.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when:

1. The training is not conducted as required.
2. The records are not maintained as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility .

E-131

ARE THE RESULTS OF THE POLLUTION CONTROL EQUIPMENT DRILLS AVAILABLE FOR INSPECTION?

Authority: 254.42(a)

Enforcement Action: W

254.42(b)

254.42(c)

254.42(d)

254.42(e)

254.42(f)

254.23

254.24

INSPECTION PROCEDURE:

1. Review the latest approved Oil Spill Response Plan and identify members of the Oil Spill

- Response
- Team and the records storage site for pollution control equipment drills.
2. Review the pollution control equipment drill records to verify that:
 - A. A drill was conducted in the last 12 months.
 - B. All the team members participated in the drill.
 - C. They are maintained for the complete 3 year exercise cycle period.
 - D. They are maintained at the site designated in the Oil Spill Response Plan.
 - E. They include the drill conditions, the drill results, and the names of the participants.
- IF NONCOMPLIANCE EXISTS:**
Issue a warning (W) INC when:
1. The drills are not conducted as required.
 2. The records are not maintained as required.
 3. The drill results are not in accordance with the Oil Spill Response Plan.
- INSPECTION COUNT/ INC COUNT:**
Enter one item checked/ issue one INC per plan audited .
-

**E-132
ACCORDANCE**

**ARE THE POLLUTION CONTROL EQUIPMENT DRILLS CONDUCTED IN
WITH THE OIL SPILL RESPONSE PLAN?**

Authority: 254.42(a) **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Review the latest approved Oil Spill Response Plan and identify the requirements for the drill.
2. Observe the drill to verify that it is conducted in accordance with the latest approved Oil Spill Response Plan.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when the drill is not conducted in accordance with the latest approved Oil Spill Response Plan.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC for each drill observed.

PROPOSED PINC

E-801

**IS THE FACILITY OR PIPELINE COVERED BY AN APPROVED OIL SPILL
RESPONSE PLAN OR A CERTIFICATION OF CAPABILITY TO RESPOND TO A
WORST**

CASE DISCHARGE?

Authority:

254.2(a)

254.2(b)

254.1(a)

Enfo

INSPECTION PROCEDURE

Verify that the facility or pipeline is covered by an approved Oil Spill Response Plan, or that a certification of capability to respond to a worse case discharge has been submitted to the Regional Supervisor.

IF NONCOMPLIANCE EXISTS

Issue a facility shut-in (S) INC if:

1. The facility or pipeline is not covered by an approved Oil Spill Response Plan, or a certification of capability to respond to a worse case discharge has not been submitted to the Regional Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility and or pipeine audited .

PROPOSED PINC

E-802

HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED OF RESULTS OF AN OIL SPILL PLAN REVIEW AND/OR RECEIVED REQUIRED REVISIONS TO THE OIL SPILL RESPONSE PLAN?

Authority: 254.2(a)

Enforcement Action: W/S

254.30(a)

254.30(b)

254.30(c)

254.30(d)

254.30(e)

INSPECTION PROCEDURE

Verify that the Oil Spill Response Plan:

1. Has been reviewed within two years from the last plan submittal date and that:
 - a) Necessary revisions were submitted to the Regional Supervisor or;
 - b) A finding of "no changes required" was submitted in writing to the Regional Supervisor.
2. Revisions have been submitted within 15 days whenever:
 - a. A change occurs which significantly reduces the response capabilities.
 - b. A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored, or transported at the facility.
 - c. A change in the name(s) or capabilities of the oil spill removal organization cited in the plan.
 - d. A significant change is made to the Area Contingency Plan(s).
3. Has been revised to include changes requested by the Regional Supervisor.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. The Regional Supervisor has not been notified of the biennial Oil Spill Response Plan review through either the receipt of plan revisions or correspondence stating that no changes to the plan were required.
2. Revisions to the Oil Spill Response Plan have not been submitted to the Regional Supervisor for approval within 15 days after significant changes which affect the plan have occurred.
3. Changes requested by the Regional Supervisor have not been made.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited .

E-801 & 802 EXISTING

PINCS

E-801

HAS AN OIL SPILL RESPONSE PLAN BEEN APPROVED BY OR HAS A CERTIFICATION OF CAPABILITY TO RESPOND BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR A FACILITY PRIOR TO OPERATING THAT FACILITY?

Authority: 30 CFR 254.2

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that an Oil Spill Response Plan has been approved or a certification of capability to respond has been submitted to the Regional Supervisor prior to operating the specified facility.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of any facility if an Oil Spill Response Plan has not been approved or a complete certification of capability to respond has not been submitted to cover that facility prior to operating the facility.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

E-802

HAS EACH OIL SPILL RESPONSE PLAN BEEN REVIEWED AND HAVE THE RESULTING MODIFICATIONS BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR APPROVAL WHEN REVISIONS ARE MADE TO THE PLAN?

Authority: 30 CFR 254.30(a)

Enforcement Action: W

30 CFR 254.30(b)

INSPECTION PROCEDURE:

1. Verify that the lessee or operator has reviewed each of his Oil Spill Response Plans at least every 2 years for adequacy to meet current conditions.
2. Verify that the lessee or operator has informed the Regional Supervisor that there are no changes to an Oil Spill Response Plan as a result of each review.
3. Verify that revisions to an Oil Spill Response Plan are submitted within 15 days to the Regional Supervisor for approval whenever:
 - A. A change occurs which significantly reduces the response capabilities.
 - B. A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored, or transported at the facility.
 - C. A change in the name(s) or capabilities of the oil spill removal organization cited in the plan.
 - D. A significant change is made to the Area Contingency Plan(s).

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each audit of each Oil Spill Response Plan if:

1. The Oil Spill response Plan has not been reviewed for adequacy at least every 2 years.
2. The Regional Supervisor has not been notified of the results of each Oil Spill Response Plan review.
3. Revisions to each Oil Spill Response Plan have not been submitted for approval to the Regional Supervisor within 15 days of making the revision.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

**EXISTING PINCS FOR STATE WATERS-
RECOMMENDED TO DELATE E-811 & 812-NO AUTHORITY!**

E-811

HAS THE OWNER(S) OR OPERATOR(S) OF AN OFFSHORE FACILITY LOCATED IN STATE WATERS SEAWARD OF THE COAST LINE SUBMITTED AN OIL SPILL RESPONSE PLAN, PREPARED IN ACCORDANCE WITH ONE OF THE APPROVED METHODS, TO THE REGIONAL SUPERVISOR FOR APPROVAL?

Authority: 30 CFR 254.50

Enforcement Action: W

30 CFR 254.51

30 CFR 254.52

30 CFR 254.53

INSPECTION PROCEDURE:

1. Verify that an oil spill response plan was submitted to the Regional Supervisor for approval.
2. Verify that the oil spill response plan was prepared in accordance with one of the approved methods.
3. Verify that the oil spill response plan contains the required information.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each required oil spill response plan audited if:

1. An oil spill response plan was not submitted to the Regional Supervisor for approval.
2. The submitted oil spill response plan was not prepared in accordance with one of the approved methods.
3. The submitted oil spill response plan does not contain the required information.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

E-812

HAS THE OWNER(S) OR OPERATOR(S) OF OFFSHORE FACILITIES LOCATED IN STATE WATERS SEAWARD OF THE COAST LINE SUBMITTED REQUIRED ADDITIONAL OIL SPILL PREVENTION INFORMATION TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 254.54

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that, in addition to the oil spill response plan, the following information was submitted to the Regional Supervisor:

1. A description of the steps being taken to prevent spills of oil or mitigate a substantial threat of such a discharge.

2. Identification of all State or Federal safety or pollution prevention requirements that apply to the prevention of oil spills the facility, and a demonstration of compliance with these requirements.
3. A description of industry safety and pollution prevention standards the facility meets.
4. A description of how any additional equipment or procedures prescribed by the Regional Supervisor are incorporated.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each set of submitted additional oil spill prevention information audited if:

1. The required additional information has not been submitted with the oil spill response plan.
2. The additional information submitted is incomplete or inadequate.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per oil spill information audited.

PROPOSED PINC

E-821

HAS THE SPILL RESPONSE OPERATING TEAM COMPLETED REQUIRED TRAINING, AND ARE RECORDS BEING MAINTAINED?

Authority:

- 254.5(a)
- 254.40
- 254.41(a)
- 254.41(d)
- 254.42(e)

254.2(a)

Enfo

INSPECTION PROCEDURE

Review the training records for members of the Spill Response Operating Team listed in the Oil Spill Response Plan to verify that:

1. Team members have attended annual hands-on training, including deployment and operation of the response equipment to be used.
2. Supervisory personnel have attended annual training in directing the deployment and use of the response equipment.
3. Records are being maintained for at least two years and are located at the site designated in the plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Members of the Spill Response Operating Team or Supervisory Personnel have not timely received the required training.
2. Training records are not being maintained as required.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited .

PROPOSED PINC

E-822

HAS THE SPILL MANAGEMENT TEAM COMPLETED REQUIRED TRAINING, AND ARE RECORDS BEING MAINTAINED?

Authority: 254.2(a)

Enforcement Action: W/S

- 254.5(a)
- 254.40
- 254.41(b)
- 254.41(c)
- 254.41(d)
- 254.42(e)

INSPECTION PROCEDURE

Review the training records of members of the Spill Management Team listed in the Oil Spill Response Plan to verify that:

1. Team members have attended annual training on locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment; spill reporting procedures; oil-spill trajectory analysis and predicting spill movement; any other responsibilities the spill management team may have.
2. Records are being maintained and are located at the site designated in the plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Members of the Spill Management Team have not timely received the required training.
2. Training records are not being maintained as required.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited .

**EXISTING PINC E-821 -RECOMMENDED REPLACEMENT BY NEW PROPOSED
PINC E-821 E- 822 above & below**

E-821

**ARE THE REQUIRED RECORDS OF OIL SPILL RESPONSE TRAINING FOR
SPILL-RESPONSE OPERATING TEAM AND THE SPILL-RESPONSE MANAGEMENT
TEAM FOR OCS FACILITIES AVAILABLE FOR REVIEW UPON REQUEST BY THE
AUTHORIZED MMS REPRESENTATIVES , AND ARE THE RECORDS KEPT FOR AT
LEAST 2 YEARS?**

Authority: 30 CFR 254.41

Enforcement Action: W

DEFINITION:

Records – Training certificates and training attendance records issued by the organization(s) providing the training.

INSPECTION PROCEDURE:

1. Review the current approved Oil Spill Response Plan to identify members of the Spill-response Operating Team and Spill-response Management Team, including the spill-response coordinator and alternates.
2. Review the current approved Oil Spill Response Plan to identify the location of the oil spill response training records.
3. Verify that the oil spill response training records are available for review and are kept for at least 2 years.
4. Verify that the records show that:
 - A. Hands-on training, including deployment and operation of the response equipment to be used, of the Spill-response Operating Team was attended at least annually.
 - B. Those personnel responsible for supervising the Spill-response Operating Team have been trained in directing the deployment and use of the response equipment at least annually.
 - C. The annual training of the Spill-response Management Team, including the spill-response coordinator and alternates, include instructions on:
 - (1) Locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment.
 - (2) Spill reporting procedures.
 - (3) Oil-spill trajectory analysis and predicting spill movement.
 - (4) Any other responsibilities the spill management team may have.
5. Verify that the records show testing has been performed to ensure that each individual identified is sufficiently trained to perform the required duties

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each audit of the oil spill response training records if the records:

1. Are not available for review.
2. Are not kept for at least 2 years.
3. Do not show that all Spill-response Operating Team and Spill-response Management Team members received the required training.
4. Do not show that the testing has been performed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program au

PROPOSED PINC

E-831 WAS THE REGIONAL SUPERVISOR INFORMED 30 DAYS IN ADVANCE OF THE DATE OF THE SCHEDULED THE EXERCISE?

Authority: 254.2(a) **Enforcement Action:** W/S
254.5(a)
254.42(f)

INSPECTION PROCEDURE
Verify that the Regional Supervisor was informed at least 30 days before the date of the following scheduled exercises:

1. Annual spill management team tabletop.
2. Annual deployment exercise of response equipment identified in the plan and that is staged at onshore locations.
3. Semiannual deployment exercise of any response equipment which the Regional Supervisor requires the operator to maintain at the facility or on dedicated vessels.

IF NONCOMPLIANCE EXISTS
Issue a warning (W) INC if:
1. The Regional Supervisor was not notified at least 30 days in advance of the scheduled exercise.
Issue a facility shut-in (S) INC if:
1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per exercise audited.

PROPOSED PINC

E-832 ARE EXERCISES FOR ALL PARTS OF THE OIL SPILL RESPONSE PLAN CONDUCTED AT LEAST ONCE EVERY THREE YEARS, AND ARE RECORDS BEING MAINTAINED?

Authority: 254.2(a) **Enforcement Action:** W/S
254.5(a)
254.40
254.42(a)
254.42(b)
254.42(c)
254.42(d)
254.42(e)

INSPECTION PROCEDURE
Review records to determine if:

1. The following annual exercises were conducted.
 - a. Spill Management Team table-top.
 - b. Response equipment deployment.
 - c. Manned facility notification.
2. A semi-annual equipment deployment exercise for equipment on dedicated vessels or that required at a facility by the Regional Supervisor.
3. All parts of the entire Oil Spill Response Plan have been exercised during the triennial period.
4. Records are being maintained for at least the three-year cycle and are located at the site designated in the plan.

Note: Individual parts of the Oil Spill Response Plan may be exercised separately over the 3-year period.

IF NONCOMPLIANCE EXISTS
Issue a warning (W) INC if:
1. Exercises were not conducted within required time frames.
2. All parts of the Oil Spill Response Plan were not exercised at least once every 3years.
3. Records are not being maintained.
Issue a facility shut-in (S) INC if:
1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per exercise audited.

PROPOSED PINC

E-833 DURING AN UNANNOUNCED OIL SPILL DRILL, DID THE OPERATOR SUCCESSFULLY DEMONSTRATE THE ABILITY TO IMMEDIATELY CARRY OUT PROVISIONS OF THE APPROVED OIL SPILL RESPONSE PLAN?

Authority: 250.132(a)

Enforcement Action: W/S

250.132(b)

254.2(a)

254.41(a)

254.41(b)

254.41(c)

254.41(d)

254.42(g)

254.42(h)

INSPECTION PROCEDURE

While conducting an on-site unannounced oil spill drill, use performance criterion from the National Preparedness for Response Exercise Program and evaluate the actions of the members of the spill management team, spill response operating team, and qualified individual; assess knowledge of the approved Oil Spill Response Plan; and compare actions taken during the drill to those listed in the approved Oil Spill Response Plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if during the exercise the operator:

1. Did not take immediate action to abate, control, contain, and remove the simulated oil discharge.
2. Did not immediately carry out the provisions of the approved Oil Spill Response Plan.
3. Failed to take all appropriate actions necessary to immediately abate the source of the simulated spill and remove any spills of oil.
4. Created conditions that would have posed unreasonable risk to the public health, life, property, aquatic life, wildlife, recreation, navigation, commercial fishing, or other uses of the ocean.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued; the operator has not responded to MMS requirements to correct the area of non-compliance; or the violation posed an immediate or imminent threat to life, property, or the built or natural environments.
2. In two successive unannounced drills, a warning (W) INC was issued after evaluation of the first drill and analysis of the second drill would have resulted in issuance of a warning (W) INC.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited .

EXISTING PINCS

E-831 HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED OF THE DATE OF ANY OIL SPILL RESPONSE PLAN EXERCISE FOR OCS FACILITIES AT LEAST 30 DAYS BEFORE THE EXERCISE?

Authority: 30 CFR 254.42(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the Regional Supervisor has been notified of the following exercises at least 30 days before they are conducted:

1. Annual spill management team tabletop exercise;
2. Annual deployment exercise of response equipment identified in the plan and that is staged at onshore locations; and
3. Semiannual deployment exercise of any response equipment which the Regional Supervisor requires an owner or operator to maintain at the facility or on dedicated vessels.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each exercise if the Regional Supervisor was not notified of the exercise within the required time frame.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

E-832

ARE EXERCISES FOR ALL PARTS OF EACH ENTIRE OIL SPILL RESPONSE PLAN FOR OCS FACILITIES CONDUCTED AT LEAST ONCE EVERY 3 YEARS?

Authority: 30 CFR 254.42(a)

Enforcement Action: W

30 CFR 254.42(b)

30 CFR 254.42(c)

30 CFR 254.42(d)

INSPECTION PROCEDURE:

Verify that exercises of an entire Oil Spill Response Plan, including response personnel and equipment, is exercised at least once every 3 years.

Note: Individual parts of the Oil Spill Response Plan may be exercised separately over the 3-year period.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of an Oil Spill Response Plan if records do not indicate that all parts of the Plan were not exercised at least once every 3 years.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

E-833

ARE EXERCISES OF SPECIFIED PORTIONS OF THE OIL SPILL RESPONSE PLAN FOR OCS FACILITIES EXERCISED MORE FREQUENTLY THAN ONCE EVERY 3 YEARS?

Authority: 30 CFR 254.42(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Review the pollution control equipment drill records to verify that:

1. A spill management team tabletop exercise was conducted in the last 12 months.
2. A deployment exercise of the response equipment identified in the oil spill response plan was conducted in the last 12 months.
3. A notification exercise for each facility that is manned on a 24-hour basis was conducted in the last 12 months.
4. A deployment exercise of any response equipment which the Regional Supervisor requires an owner or operator to maintain at the facility or on dedicated vessels was conducted in the last 6 months.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each audit of the oil spill response plan if:

1. The exercises are not conducted within the required time period.
2. The exercises did not incorporate the proper tests.
3. The spill scenario was revealed prior to the start of any exercise.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per plan audited.

PROPOSED PINC

E-841

WERE OBSERVED OIL DISCHARGES REPORTED BY THE OPERATOR?

Authority: 254.2(a)

Enforcement Action: W/S

254.46(a)

254.46(b)

254.46(c)

INSPECTION PROCEDURE

Verify that all oil discharges:

1. Regardless of origin or size, were immediately reported to the National Response Center.
2. Of one barrel or more, from the operator's facility or pipeline, were orally reported without delay to the Regional Supervisor and that a written report was submitted within 15 calendar days after the discharge had stopped.
3. From another offshore facility were immediately reported to the Regional Supervisor and the responsible party.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Records indicate that an oil discharge was observed and not reported or not reported timely as required.
2. A written follow-up report for an oil spill of one barrel or more from the facility was not submitted to the Regional Supervisor within 15 days after the spillage has been stopped.
3. The operator failed to report spills of one barrel or more to the Regional Supervisor without delay.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility and/or pipeline audited.

PROPOSED PINC

E-842 DURING AND FOLLOWING AN OIL DISCHARGE FROM A FACILITY AND/OR PIPELINE, WERE IMMEDIATE RESPONSE ACTIONS TAKEN AND WERE THEY CONSISTENT WITH THE APPROVED OIL SPILL RESPONSE PLAN?

Authority: 250.132(a)

Enforcement Action: W/S

250.132(b)

250.107(b)

250.300(a)(1)

254.2(a)

254.5(a)

254.5(c)

254.23(a)

254.23(b)

254.23(c)

254.23(d)

254.23(e)

254.23(f)

254.23(g)

254.40

INSPECTION PROCEDURE

After an oil discharge has occurred, review MMS and responsible party-generated spill response reports, discuss response actions with representatives of the Federal On-Scene coordinator, obtain information from oil spill removal organizations, and obtain additional data from the responsible party and/or members of the Incident Command Team, as required. If deployed to the Incident Command Post during the response, prepare detailed observations of real-time response activities. Compare collected data to that contained in the approved Oil Spill Response Plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if the operator:

1. Did not take immediate action to abate, control, contain, and remove the oil discharge.
2. Did not immediately carry out the provisions of the approved Oil Spill Response Plan.

3. Failed to take all appropriate actions necessary to immediately abate the source of the spill and remove any spills of oil.

4. Created conditions that posed unreasonable risk to the public health, life, property, aquatic life, wildlife, recreation, navigation, commercial fishing, or other uses of the ocean.

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued; the operator has not timely responded to MMS requirements to correct the area of non-compliance; or the violation resulted in damage to or posed an immediate or imminent threat to life, property, or the built or natural environments.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per facility and/or pipeline audited.

E-841

EXISTING PINC

HAS THE LESSEE OR OPERATOR REPORTED EACH OIL SPILL OBSERVED FROM OCS FACILITIES?

Authority: 30 CFR 250.46

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the lessee or operator immediately notified the National Response Center if an oil spill is observed:
 - A. From the lessee's or operator's facility.
 - B. From another offshore facility.
 - C. Of unknown origin.
2. Verify that the lessee or operator notified the Regional Supervisor orally without delay, with a written follow-up report, if an oil spill estimated to be one barrel or more from the lessee's or operator's facility is observed.
3. Verify that the lessee or operator immediately notified the Regional Supervisor and responsible party if an oil spill from another offshore facility is observed

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each oil spill audit if:

1. Records indicate that an oil spill was observed and not reported within the specified time period.
2. A written follow-up report for an oil spill of one barrel or more from the lessee's or operator's facility was not received by the Regional Supervisor within 15 days after the spillage has been stopped.
3. The written report to the Regional Supervisor for any oil spill of 50 barrels or more does not include information on the sea state, meteorological conditions, the size and appearance of the oil slick, and any additional information required by the Regional Supervisor if it is determined that an analysis of the oil spill response is necessary.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per oil spill audited.



INTRO.doc (89 KB)



GL-G.doc (175 KB)



GL-E.doc (83 KB)



GL-D.doc (503 KB)



GL-C.doc (192 KB)



GL-W.doc (214 KB)



GL-A.doc (68 KB)



GL-P.doc (534 KB)



GL-L.doc (92 KB)



GI-M.doc (199 KB)



GL-H.doc (237 KB)



GL-I.doc (141 KB)



GL-F.doc (79 KB)



GL-Z.doc (155 KB)



APPEND.doc (163 KB)



2008 OFFICE
INCS.doc (346 KB)..