

**DRILLING**  
**LAST UPDATE 2015**

**TRAVELING BLOCK**

**D-100**      **IS AN OPERABLE CROWN BLOCK SAFETY DEVICE INSTALLED TO PREVENT THE TRAVELING BLOCK FROM STRIKING THE CROWN BLOCK?**  
**Authority:** 30 CFR 250.404      **Enforcement Action:** S **DEFINITION:**  
**Crown block safety device** - Normally a device (manual or electronic) installed to prevent the block from striking the crown.  
**Note:** The crown block safety device is not to be actuation tested when the crown block is loaded with the drill pipe, casing, or work string.  
**INSPECTION PROCEDURE:**  
1. Inspect the rig to verify the installation of a crown block safety device (manual or electronic).  
2. Visually inspect position of manual device above cable drum to verify the distance for cable shutdown.  
3. Verify that the device (manual or electronic) has been reset after drill-line slipping operations.  
4. Verify that the device (manual or electronic) is in service and witness the proper operation of the device.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when:  
1. The crown block safety device is not installed or operable.  
2. The manual device is not installed above the cable drum a sufficient distance for cable shutdown.  
3. The manual or electronic device has not been reset after drill-line slipping operations.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each drilling unit inspected.

**D-101**      **IS THE CROWN BLOCK SAFETY DEVICE CHECKED FOR PROPER OPERATION AT LEAST ONCE EACH WEEK, AFTER EACH DRILL-LINE SLIPPING OPERATION, AND ARE THE RESULTS ENTERED INTO THE DRILLER'S REPORT?**  
**Authority:** 30 CFR 250.404      **Enforcement Action:** W/S  
**INSPECTION PROCEDURE:**  
Check driller's report to verify that the crown block safety device is checked for operation weekly and after each drill-line slipping operation.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if a required check is not recorded in driller's report. Issue a rig shut-in (S) INC if the required checks are not performed. **INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each drilling unit inspected.

**DIRECTIONAL SURVEY**

**D-110**      **ARE INCLINATION SURVEYS OBTAINED ON ALL VERTICAL WELLS AT INTERVALS NOT EXCEEDING 1,000 FEET DURING THE NORMAL COURSE OF DRILLING?**  
**Authority:** 30 CFR 250.461(a)(1)      **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Inspect records of inclination surveys, noting intervals, for compliance.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when the required inclination survey has not been taken or the 1,000 foot interval has been exceeded.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.

**D-111**      **ARE DIRECTIONAL SURVEYS GIVING BOTH INCLINATION AND AZIMUTH OBTAINED ON ALL DIRECTIONAL WELLS AT INTERVALS NOT EXCEEDING 500 FEET DURING THE NORMAL COURSE OF DRILLING?**  
**Authority:** 30 CFR 250.461(b)      **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Inspect records of directional surveys, noting intervals, for compliance.  
2. Verify that the information is recorded electronically.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when the required directional survey has not been taken or the 500-foot interval has been exceeded.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.



**D-121** **IS THE MOVEMENT OF ALL DRILLING UNITS ON AND OFF LOCATION REPORTED TO THE DISTRICT MANAGER 24 HOURS PRIOR TO THE MOVEMENT, INCLUDING THE RIG NAME, LEASE NUMBER, WELL NUMBER, AND THE EXPECTED TIME OF ARRIVAL OR DEPARTURE?**  
**Authority:** 30 CFR 250.403(a) **Enforcement Action:** W  
30 CFR 250.403(b)

**INSPECTION PROCEDURE:**

Verify that the Operator has properly notified the District Manager of:

1. Arrival of the MODU on location.
2. Movement of a platform rig to a platform.
3. Movement of a platform rig to another slot.
4. Movement of a MODU to another slot.
5. Departure of all rigs from the location.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if the proper notification has not been given.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC for each drilling unit inspected.

## ESD SYSTEM

**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:** 30 CFR 250.406(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.

## CASING PROGRAM

**D-150** **IS CASING SET AS APPROVED?**

**Authority:** 30 CFR 250.420

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Compare APD approved proposed casing setting depths to on-site records of actual casing setting depths for all strings of casing set.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC for each casing string not set as approved.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC for each casing string inspected.

**D-151** **IS ANY PORTION OF AN ANNULUS OPPOSITE A PERMAFROST ZONE WHICH IS NOT PROTECTED BY CEMENT FILLED WITH A LIQUID WHICH HAS A FREEZING POINT BELOW THE MINIMUM PERMAFROST TEMPERATURE TO PREVENT INTERNAL FREEZEBACK AND WHICH IS TREATED TO MINIMIZE CORROSION?**

**Authority:** 30 CFR 250.428(j)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Check APD and drilling plan to identify permafrost zones and to verify that the annulus within permafrost zones are filled with cement or liquid whose freezing point is lower than the permafrost temperature and which is treated to minimize corrosion.
2. Witness permafrost zone cementing operations.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if operations have not yet resumed and records indicate that the fluid in the annulus does not have a freezing point lower than the temperature of the permafrost or if it is not treated to minimize corrosion.

Issue a rig shut-in (S) INC if operations are in progress and the fluid or cement in the annulus does not have a freezing point lower than the temperature of the permafrost or if it is not treated to minimize corrosion, if conditions permit.

**INSPECTION COUNT/ INC COUNT:**

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

- D-152**      **HAS A PRESSURE-INTEGRITY TEST BEEN RUN BELOW THE SURFACE CASING, THE INTERMEDIATE CASING(S), AND LINER(S) USED AS INTERMEDIATE CASING(S), AFTER DRILLING AT LEAST 10 FEET BUT NO MORE THAN 50 FEET OF NEW HOLE BELOW THE CASING SHOE?**  
**Authority: 30 CFR 250.427**      **Enforcement Action: W/S**  
**INSPECTION PROCEDURE:**  
Inspect on-site records from the previous inspection to the current inspection date to verify that pressure tests to obtain data to be used in estimating formation fracture gradients have been performed as required.  
**Note:**  
1. Pressure-integrity tests shall be conducted either by testing to formation leak-off or to a predetermined equivalent mud weight as specified in the APD.  
2. The District Manager may require a pressure-integrity test to be run at the conductor casing shoe due to local geologic conditions or planned casing setting depths.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC for each formation fracture gradient test not otherwise performed as required.  
Issue a rig shut-in (S) INC if formation fracture gradient tests have not been performed and the tests can still be conducted.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each test inspected.
- D-153**      **ARE DRILLING OPERATIONS SUSPENDED WHEN THE SAFE MARGIN, AS APPROVED IN THE APD, BETWEEN THE DRILLING FLUID WEIGHT IN USE AND THE EQUIVALENT DRILLING FLUID WEIGHT AT THE CASING SHOE, IS NOT MAINTAINED?**  
**Authority: 30 CFR 250.427(b)**      **Enforcement Action: W/S**  
**INSPECTION PROCEDURE:**  
Inspect the on-site records to determine if the drilling fluid weight is within a safe margin of the equivalent drilling fluid weight. A safe margin is to be approved by the District Manager.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if records indicate the safe margin has not been maintained.  
Issue a rig shut-in (S) INC if, while present on the rig, the safe margin is not being maintained.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each drilling unit inspected.
- D-154**      **ARE THE RESULTS OF ALL TESTS AND OF HOLE-BEHAVIOR OBSERVATIONS MADE DURING THE COURSE OF DRILLING RELATED TO FORMATION INTEGRITY AND PORE PRESSURE RECORDED IN THE DRILLER'S REPORT?**  
**Authority: 30 CFR 250.427(a)**      **Enforcement Action: W**  
**INSPECTION PROCEDURE:**  
Inspect records to verify that the results of all tests and of hole behavior observations are recorded.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if all tests are not recorded in the driller's report.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each drilling unit inspected.
- D-155**      **IF THE HOLE FOR THE DRIVE OR STRUCTURAL CASING WAS DRILLED, WAS A QUANTITY OF CEMENT SUFFICIENT TO FILL THE ANNULAR SPACE BACK TO THE MUD LINE USED?**  
**Authority: 30 CFR 250.421(a)**      **Enforcement Action: W**  
**INSPECTION PROCEDURE:**  
Inspect records to verify that a sufficient quantity of cement was used to fill annular space back to mud line.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if records indicate that the quantity of cement was insufficient.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.

D-156

**IS CEMENT FILL IN THE ANNULAR SPACES OF THE CONDUCTOR CASING VERIFIED BY OBSERVING CEMENT RETURNS, OR IS AN ADDITIONAL QUANTITY OF CEMENT USED TO ENSURE THE SPACE IS FILLED BACK TO THE MUD LINE?**

**Authority:** 30 CFR 250.421(b)

**Enforcement Action:** W/S

**Note:** The bottom of a well cellar or the surfaces of an artificial island are acceptable substitutes for the mud line.

**INSPECTION PROCEDURE:**

1. Check records to verify that cement returns were observed.
2. If possible, observe the cement returns.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if operations are not in progress and:

1. Records do not indicate that returns were observed at the mud line.
2. Sufficient quantities of cement were not used.

Issue a rig shut-in (S) INC if operations are in progress, cement returns were not observed, and an additional quantity of cement was not used to assure fill to the mud line.

**INSPECTION COUNT/ INC COUNT:**

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

D-157

**IS SURFACE CASING CEMENTED WITH A QUANTITY OF CEMENT THAT FILLS THE CALCULATED ANNULAR SPACE TO AT LEAST 200 FEET INSIDE THE CONDUCTOR CASING (OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER)?**

**Authority:** 30 CFR 250.421(c)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Check records to verify that sufficient quantities of cement were used to fill the annular space to at least 200 feet inside the conductor casing.
2. When geologic conditions such as near-surface fractures and faulting exist, verify that surface casing is cemented with a quantity of cement that fills the calculated annular space to the mud line, or as approved or prescribed by the District Manager.
3. For floating drilling operations, a lesser volume of cement may be used to prevent sealing the annular space between the conductor casing and surface casing if the District Manager determines that the uncemented space is necessary to provide protection from burst and collapse pressures which may be applied inadvertently to the annulus between casings during blowout preventer (BOP) testing operations.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if insufficient quantities of cement were used and the casing shoe has been drilled out.

Issue a rig shut-in (S) INC if the shoe has not been drilled out and records indicate that insufficient quantities of cement were used to fill the annular space to at least 200 feet inside the conductor casing.

**INSPECTION COUNT/ INC COUNT:**

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

D-158

**HAVE THE SURFACE, INTERMEDIATE, AND PRODUCTION CASINGS BEEN PRESSURE TESTED TO 70 PERCENT OF THE MINIMUM INTERNAL YIELD PRESSURE OF THE CASING, AND HAS THE CONDUCTOR CASING BEEN TESTED TO A MINIMUM OF 200 PSI FOR 30 MINUTES, WITH NO MORE THAN 10 PERCENT PRESSURE DROP DURING THE TESTS, OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER?**

**Authority:** 30 CFR 250.423(a)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Inspect the on-site records from the previous inspection to the current inspection date to verify that proper casing pressure tests have been performed.
2. Verify remedial action taken if pressure declines more than 10 percent in 30 minutes or if there were other indications of leaks.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if the Operator had a bad pressure test, performed unapproved remedial action, and subsequently had a successful pressure test.

Issue a rig shut-in (S) INC if the Operator has drilled out the shoe and not performed a test or drilled out of the shoe without achieving a satisfactory pressure test.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC for each casing string inspected.

D-159

**ARE ALL CASING AND LINER PRESSURE TESTS RECORDED ON A CHART CERTIFIED (SIGNED AND DATED) BY THE ONSITE REPRESENTATIVE WITH THE TIME, DATE, AND RESULTS?**

**Authority:** 30 CFR 250.426

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that required pressure tests are recorded on a chart certified as correct.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC for each casing string pressure test, including liner tests, not recorded as required.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC for each casing string inspected.





- D-169** **IS ENOUGH CEMENT USED TO COVER OR ISOLATE ALL HYDROCARBON BEARING ZONES, AT LEAST 500 FEET OF ANNULAR SPACE ABOVE THE CASING SHOE AND 500 FEET ABOVE THE UPPERMOST HYDROCARBON BEARING ZONE?**  
**Authority:** 30 CFR 250.421(e) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Inspect on site records to verify that enough cement was utilized.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC for each incident where enough cement was not utilized.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.
- D-170** **IF THE DIVERTER OR BOP ARE NIPPLED DOWN DURING THE WAITING PERIOD FOR CEMENTING, HAS IT BEEN DETERMINED SAFE TO DO SO BEFORE NIPPLING DOWN?**  
**Authority:** 30 CFR 250.422(b) **Enforcement Action:** W  
**Note:** Determination must be based on a knowledge of formation conditions, cement composition, effects of nipping down, presence of potential drilling hazards, well conditions, cementing, and experience.  
**INSPECTION PROCEDURE:**  
Review records.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the waiting period is deemed insufficient.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.
- D-171** **IF THE CASING SETTING DEPTHS ARE MORE THAN 100 FEET TVD FROM THE DEPTH APPROVED IN THE APD, HAS THE CHANGE BEEN APPROVED BY THE DISTRICT MANAGER?**  
**Authority:** 30 CFR 250.428(b) **Enforcement Action:** W/S  
**INSPECTION PROCEDURE:**  
Inspect on-site records to verify that casings are set as approved.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the casing was set deeper without approval. Issue a rig shut-in (S) INC if drilling has continued deeper than approved. **INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.
- D-172** **WERE REMEDIAL ACTIONS, APPROVED BY THE DISTRICT MANAGER, TAKEN IF THERE WERE INDICATIONS OF AN INADEQUATE CEMENTING JOB?**  
**Authority:** 30 CFR 250.428(c) **Enforcement Action:** W  
**30 CFR 250.428(d)**  
**Note:** Methods to determine an inadequate cementing job are:  
1. Pressure test the casing shoe.  
2. Run a temperature survey.  
3. Run a cement bond log.  
4. Use a combination of these techniques.  
**INSPECTION PROCEDURE:**  
Inspect on-site records to verify that an adequate remedy was utilized.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if an inadequate remedy was utilized.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.
- D-173** **WAS REMEDIAL ACTION TAKEN IF THE PRIMARY CEMENT JOB DID NOT ISOLATE ABNORMAL PRESSURE INTERVALS?**  
**Authority:** 30 CFR 250.428(e) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Inspect on-site records to verify that proper remedial action was taken.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the proper remedial action was not taken.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.





D-178

**DID OPERATOR PERFORM A NEGATIVE PRESSURE TEST ON THE INTERMEDIATE AND PRODUCTION CASING STRING TO ENSURE PROPER CASING INSTALLATION WHEN USING A SUBSEA BOP STACK OR MUDLINE SUSPENSION SYSTEM?**

**Authority:** 30 CFR 250.423(c)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Check drilling reports to assure that negative pressure test on the casing strings or liners were conducted in accordance with test procedures and criteria in the approved APD.
2. Verify a negative pressure test was performed prior to unlatching the BOP at any point in the well development.
3. Verify any necessary remedial actions were taken and notification was immediately given to the District Manager.
4. Verify a description of the corrective action taken was provided to the District Manager and approval was received for the retest.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if the operator has moved off location and drilling reports do not show that operator performed a negative pressure test on the intermediate and production casing string.

Issue a facility shut-in (S) INC if the operator is still on location and drilling reports does not show that operator performed a negative pressure test on the intermediate and production casing string.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per negative pressure test.

D-179

**ARE TWO BARRIERS IN PLACE PRIOR TO PERFORMING A NEGATIVE PRESSURE TEST?**

**Authority:** 30 CFR 250.423(c)(6)

**Enforcement Action:** W/S

30 CFR 250.420(b)(3)

**INSPECTION PROCEDURE:**

Verify from driller's report that two barriers were in place prior to performing a negative pressure test.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if the operator has completed a successful negative pressure test without installing two barriers prior to the test.

Issue a facility shut-in (S) INC if the operator is conducting a negative pressure test without two barriers installed.

**INSPECTION COUNT/INC COUNT:**

Enter one item checked/ issue one INC per negative pressure test.

## BOP SYSTEMS AND COMPONENTS

D-200

**DOES THE WORKING-PRESSURE RATING OF ALL BOP COMPONENTS EXCEED THE MASP TO WHICH THEY MAY BE SUBJECTED?**

**Authority:** 30 CFR 250.440

**Enforcement Action:** S

**INSPECTION PROCEDURE:**

Check APD and approved plans for verification of MASP and working pressure components of BOP systems.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) if the working pressure rating of BOP components does not exceed the MASP to which the components are subjected, with the exclusion of the annular preventer.

**INSPECTION COUNT/ INC COUNT:**

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

D-201

**DOES THE ACCUMULATOR SYSTEM PROVIDE SUFFICIENT CAPACITY TO SUPPLY 1.5 TIMES THE VOLUME OF FLUID NECESSARY TO CLOSE AND HOLD CLOSED ALL BOP SYSTEM COMPONENTS WITH A MINIMUM PRESSURE OF 200 PSI ABOVE THE PRECHARGE PRESSURE WITHOUT ASSISTANCE FROM A CHARGING SYSTEM?**

**Authority:** 30 CFR 250.441(c)

**Enforcement Action:** S

30 CFR 250.442(c)

**INSPECTION PROCEDURE:**

1. Verify that the BOP actuating system which is installed is in compliance with that which has been approved.
2. Witness the proper automatic operation of the charging system.
3. 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 BOP system inspected.

- D-202** **HAVE ACCUMULATOR REGULATORS, SUPPLIED BY RIG AIR AND WITHOUT A SECONDARY SOURCE OF PNEUMATIC SUPPLY, BEEN EQUIPPED WITH MANUAL OVERRIDES OR OTHER DEVICES PROVIDED TO ENSURE CAPABILITY OF HYDRAULIC OPERATIONS IF RIG AIR IS LOST?**  
**Authority:** 30 CFR 250.441(c) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Visually check to see if the accumulator unit is equipped with a fail-safe pneumatically operated regulator or a manually operated regulator to ensure uninterrupted functional capability.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if:  
1. A manual override is not installed on the air operated regulator, or  
2. The regulator is not equipped with a secondary source of air.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-203** **IS AN AUTOMATIC BACKUP ACCUMULATOR-CHARGING SYSTEM, SUPPLIED BY A POWER SOURCE INDEPENDENT FROM THE POWER SOURCE TO THE PRIMARY ACCUMULATOR-CHARGING SYSTEM, AND POSSESSING SUFFICIENT CAPABILITY TO CLOSE ALL BOP COMPONENTS AND HOLD THEM CLOSED, PROVIDED?**  
**Authority:** 30 CFR 250.443(a) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Verify that the backup system is supplied by an independent power source.  
2. Witness operation of the accumulator backup system and verify that the backup system automatically charges the accumulators.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when an operable automatic accumulator back-up system is not installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-204** **IS AT LEAST ONE OPERABLE REMOTE BOP CONTROL STATION, IN ADDITION TO THE ONE ON THE DRILLING FLOOR, PROVIDED IN A READILY ACCESSIBLE LOCATION AWAY FROM THE DRILLING FLOOR?**  
**Authority:** 30 CFR 250.443(b) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Verify that a readily accessible remote BOP control station is installed.  
2. Witness the operation of the remote station, or inspect control panel gauge for presence of operating control pressure.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when an operable remote BOP control station is not installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per station inspected.
- D-205** **IS A DRILLING SPOOL WITH SIDE OUTLETS PROVIDED IF SIDE OUTLETS ARE NOT PROVIDED IN THE BODY OF THE BOP STACK TO PROVIDE FOR SEPARATE KILL AND CHOKE LINES?**  
**Authority:** 30 CFR 250.443(c) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Visually confirm that side outlets are provided for separate choke and kill lines.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when separate choke and kill line outlets and lines are not installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-207** **IS EACH CHOKE AND KILL LINE EQUIPPED WITH TWO FULL OPENING VALVES, WITH AT LEAST ONE REMOTE CONTROLLED VALVE FOR SURFACE AND ALL REMOTE CONTROLLED VALVES FOR SUBSEA?**  
**Authority:** 30 CFR 250.443(d) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Visually inspect the choke and kill lines to determine if they are each equipped with at least one remotely-controlled valve.  
2. Exception for the kill line (surface systems only), a check valve may be installed on the kill line in lieu of the remotely-controlled valve, provided two readily accessible manual valves are in place and the check valve is placed between the manual valves and the pump.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if the choke and kill lines are not each equipped with at least one remotely-controlled valve or as excepted above.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each line inspected.

- D-208 IS A FILL-UP LINE INSTALLED ABOVE THE UPPERMOST BOP?**  
**Authority:** 30 CFR 250.443(e) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Verify that the fill-up line is installed above the uppermost BOP. Kill lines are not acceptable as fill-up lines.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when a fill-up line has not been installed above the uppermost BOP.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-209 DO THE CHOKE MANIFOLD COMPONENTS HAVE A RATED WORKING PRESSURE AT LEAST AS GREAT AS THE RATED WORKING PRESSURE OF THE RAM-TYPE BOP'S?**  
**Authority:** 30 CFR 250.444(b) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Visually check rated working pressure of the equipment and check APD and rig manual to confirm the choke equipment rated working pressure is as great as the ram-type BOP's rated working pressure.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if the choke manifold and related equipment have a rated working pressure less than the rated working pressure of the ram-type BOP's.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-210 ARE ALL COMPONENTS OF THE CHOKE MANIFOLD SYSTEM SUITABLE FOR THE APPLICATION IN WHICH THOSE COMPONENTS WILL BE USED?**  
**Authority:** 30 CFR 250.444(a) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Visually check location of choke manifold system to confirm it is in a heated area.  
2. Check records to determine if choke manifold system has been bled.  
3. Check records to determine what type of antifreeze fluid is used, if any.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if the components of the choke manifold system are not protected by heating, draining, or filling with proper fluids as described above.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-211 IF BUFFER TANKS ARE INSTALLED DOWNSTREAM OF THE CHOKE ASSEMBLIES FOR THE PURPOSE OF MANIFOLDING THE BLEED LINES TOGETHER, ARE ISOLATION VALVES INSTALLED ON EACH LINE?**  
**Authority:** 30 CFR 250.444(b) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Visually check to confirm that isolation valves are installed between choke assemblies and buffer tank.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if isolation valves are not installed on each line.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-212 DO VALVES, PIPES, FLEXIBLE STEEL HOSES, AND OTHER FITTINGS UPSTREAM OF THE CHOKE MANIFOLD HAVE PRESSURE RATINGS AT LEAST AS GREAT AS THE RATED WORKING PRESSURE OF THE RAM-TYPE BOP'S?**  
**Authority:** 30 CFR 250.444(c) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Verify that affected equipment has a rated working pressure at least equal to the rated pressure of the ram-type BOP's.  
2. Visually inspect the affected equipment to verify the pressure rating.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when valves, pipes, flexible steel hoses, and other fittings upstream of and including the choke manifold do not have a pressure rating at least equal to the rated working pressure of the ram-type BOP's.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.

- D-213** **IS WELLHEAD ASSEMBLY WITH A RATED WORKING PRESSURE THAT EXCEEDS THE MAXIMUM ANTICIPATED WELL-HEAD PRESSURE?**  
**Authority:** 30 CFR 250.443(g) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Check APD to determine if the rated working pressure of the wellhead assembly is greater than the Maximum Anticipated Well Head Pressure.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if the rated working pressure of the wellhead assembly is less than the Maximum Anticipated Well Head Pressure.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per well inspected.
- D-214** **IS A FULL-OPENING KELLY VALVE INSTALLED BELOW THE SWIVEL (UPPER KELLY VALVE)?**  
**Authority:** 30 CFR 250.445(a) **Enforcement Action:** S  
30 CFR 250.445(h)  
**INSPECTION PROCEDURE:**  
Verify that the upper kelly valve is installed and operable.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when an operable upper kelly valve has not been installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-215** **IS A FULL-OPENING, STRIPPABLE, KELLY VALVE INSTALLED AT THE BOTTOM OF THE KELLY (LOWER KELLY VALVE)?**  
**Authority:** 30 CFR 250.445(b) **Enforcement Action:** S  
30 CFR 250.445(h)  
**INSPECTION PROCEDURE:**  
Verify that the lower kelly valve is installed and operable.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when an operable lower kelly valve has not been installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-216** **WITH A MUD MOTOR IN SERVICE AND WHILE USING DRILL PIPE IN LIEU OF A KELLY, IS ONE KELLY VALVE LOCATED ABOVE AND ONE STRIPPABLE KELLY VALVE LOCATED BELOW THE JOINT OF DRILL PIPE EMPLOYED IN LIEU OF A KELLY?**  
**Authority:** 30 CFR 250.445(c) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Visually check to confirm that both an upper and lower kelly valve are installed.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if either kelly valve is not installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each kelly valve inspected.
- D-217** **ON A TOP-DRIVE SYSTEM EQUIPPED WITH A REMOTE-CONTROLLED VALVE, IS A STRIPPABLE KELLY VALVE INSTALLED BELOW THE REMOTE-CONTROLLED VALVE?**  
**Authority:** 30 CFR 250.445(d) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Visually check to confirm that both the upper remote-controlled and the lower kelly valves are installed on a top drive system.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if both kelly valves are not installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-218** **IS A WRENCH TO FIT EACH MANUALLY-OPERABLE VALVE READILY ACCESSIBLE TO THE DRILLING CREW?**  
**Authority:** 30 CFR 250.445(i) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Verify that a wrench to fit each manually-operable valve in use is readily accessible to the drilling crew.  
2. Wrenches shall be available for upper and lower kelly valves, and all drill-string safety valves maintained to fit the drill-string connections.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when required wrenches are not readily accessible to the drilling crew.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each valve inspected.



- D-224** **IS THE KILL LINE INSTALLED ON THE BOP STACK?**  
**Authority:** 30 CFR 250.443(d) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Verify that the kill line is installed.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when the kill line is not installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-225** **IF A BOP CONTROL STATION OR POD DOES NOT FUNCTION PROPERLY, ARE DRILLING OPERATIONS SUSPENDED UNTIL THAT STATION OR POD IS OPERABLE?**  
**Authority:** 30 CFR 250.451(d) **Enforcement Action:** W/S  
**INSPECTION PROCEDURE:**  
Verify that the BOP control station or pod function properly.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if drilling operations were not suspended when the station or pod malfunctioned, but was subsequently functional.  
Issue a rig shut-in (S) INC when drilling operations are in progress with a station or pod malfunctioning.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per inspection.
- D-226** **DID OPERATOR PROVIDE BSEE REPRESENTATIVE ACCESS TO THE LOCATION TO WITNESS ANY TESING OR INSPECTIONS?**  
**Authority:** 30 CFR 250.416(g)(2)(ii) **Enforcement Action:** S  
Check records to verify operator notified District Manager 72 hours in advance and provided access to the testing and inspection location.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a facility shut-in (S) INC if operators did not notify BSEE District Manager and provide access to the location to witness testing and inspection.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per testing or inspection.
- D-227** **DID OPERATOR PRIOR TO ANY SHEARING RAM TESTS AND INSPECTIONS NOTIFY THE DISTRICT MANAGER AT LEAST 24 HOURS IN ADVANCE?**  
**Authority:** 30 CFR 250.416(g)(2)(ii) **Enforcement Action:** W Check records to verify that operator notified the District Manager at least 72 hours prior to any shearing ram tests and inspections.  
**Note:** Applies to:  
1. Shearing of pipe  
2. Function test, pressure test, and actual shearing test.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if operator did not notify the District Manager at least 72 hours prior to any shearing ram tests and inspections.  
**INSPECTION COUNT/INC COUNT:**  
Enter one item checked/ issue one INC per testing or inspection.

## SURFACE BOP SYSTEM

- D-231** **IF A REMOTE-CONTROLLED VALVE IS NOT INSTALLED IN THE KILL LINE, ARE BOTH MANUAL VALVES READILY ACCESSIBLE AND IS THE CHECK VALVE INSTALLED BETWEEN THE MANUAL VALVES AND THE PUMP?**  
**Authority:** 30 CFR 250.443(d)(3) **Enforcement Action:** S **Note:** Surface BOP systems only.  
**INSPECTION PROCEDURE:**  
If a check valve is used in lieu of a remote-controlled valve in the kill line, visually confirm that:  
1. Two readily accessible manual valves are in place, and  
2. The check valve is placed between the two manual valves and the pump.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if:  
1. The two manual valves are not in place, or  
2. The check valve is not placed between the outer manual valve and the pump.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.

**D-232** **PRIOR TO DRILLING BELOW SURFACE CASING, IS A BOP SYSTEM INSTALLED CONSISTING OF AT LEAST FOUR REMOTE-CONTROLLED, HYDRAULICALLY-OPERATED BOP'S INCLUDING AT LEAST TWO EQUIPPED WITH PIPE RAMS, BLIND-SHEAR RAMS, AND ONE ANNULAR TYPE?**  
**Authority: 30 CFR 250.441(a)** **Enforcement Action: S**  
**INSPECTION PROCEDURE:**  
If surface casing has been set, verify that the required BOP system has been installed.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when the required BOP system has not been installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.

## **SUBSEA BOP SYSTEMS**

**D-240** **PRIOR TO DRILLING BELOW SURFACE CASING WITH A SUBSEA STACK, ARE THERE AT LEAST FOUR REMOTE-CONTROLLED, HYDRAULICALLY-OPERATED BOPS, INCLUDING AT LEAST TWO EQUIPPED WITH PIPE RAMS, ONE WITH BLIND-SHEAR RAMS, AND ONE ANNULAR TYPE?**  
**Authority: 30 CFR 250.442(a)** **Enforcement Action: S**  
**INSPECTION PROCEDURE:**  
If surface casing has been set, verify that the required BOP system has been installed.  
**NOTE:** For the subsea BOP stack, operators must make available the documentation that the blind shear ram is capable of shearing any drill pipe (including workstring & tubing) in the hole under MASP.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when a required, approved, and operable BOP system is not installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.

**D-241** **IS THE ACCUMULATOR CLOSING SYSTEM, TO PROVIDE FAST CLOSURE OF THE BOP COMPONENTS AND TO OPERATE ALL CRITICAL FUNCTIONS IN CASE OF A LOSS OF THE POWER FLUID CONNECTION TO THE SURFACE, INSTALLED IN ACCORDANCE WITH API RP 53, SECTION 13.3?**  
**Authority: 30 CFR 250.442(c)** **Enforcement Action: S**  
**INSPECTION PROCEDURE:**  
Verify that:  
1. BOP stack is equipped with accumulator bottles. A. BOP Rams close within 45 seconds.  
B. Annular BOPS close within 60 seconds.  
C. Operating response time for the choke and kill valves (either open or closed) does not exceed the minimum observed BOP Ram close response time.  
D. Time to unlatch the lower marine riser package does not exceed 45 seconds.  
2. Check closing times for pressure and function tests are in compliance.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if the accumulator closing system cannot operate the specified equipment within the specified time.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.

**D-242** **DOES THE BOP SYSTEM INCLUDE OPERABLE DUAL-POD CONTROL SYSTEMS TO ENSURE PROPER AND INDEPENDENT OPERATION?**  
**Authority: 30 CFR 250.442(b)** **Enforcement Action: S**  
**INSPECTION PROCEDURE:**  
1. Verify that a dual pod control system has been installed as follows:  
A. Two completely redundant control pods.  
B. Each pod contains all necessary valves and regulators to operate the BOP stack functions.  
2. Conditions permitting, witness a function test of each pod to verify proper actuation.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when an operable dual pod control system has not been installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.





**D-248** **DOES THE SUBSEA BOP SYSTEM HAVE AN AUTOSHEAR AND DEADMAN SYSTEM FOR DYNAMICALLY POSITIONED RIGS?**  
**Authority:** 30 CFR 250.442(f) **Enforcement Action:** S **Definitions:**  
1. **Autoshear system** means a safety system that is designed to automatically shut in the wellbore in the event of a disconnect of the LMRP. When the autoshear is armed, a disconnect of the LMRP closes, at a minimum, one set of blind-shear rams. This is considered a “rapid discharge” system.  
2. **Deadman System** means a safety system that is designed to automatically close, at a minimum, one set of blind-shear rams in the event of a simultaneous absence of hydraulic supply and signal transmission capacity in both subsea control pods. This is considered a “rapid discharge” system.  
**INSPECTION PROCEDURE:**  
Verify that operator provided an autoshear and deadman systems for dynamically positioned rigs when drilling.  
**Note:** Operator does not have to have an acoustic system.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) if operator did not provide an autoshear and deadman systems for dynamically positioned rigs when drilling.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per subsea BOP system inspected.

**D-249** **DID THE OPERATOR INSTALL OPERATIONAL OR PHYSICAL BARRIER(S) ON A SUBSEA BOP CONTROL PANEL TO PREVENT ACCIDENTAL DISCONNECT FUNCTIONS?**  
**Authority:** 30 CFR 250.442(g) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify that operator incorporated enable buttons on a subsea BOP control panel to ensure two-handed operation for all critical functions.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if operator did not incorporated enable buttons on control panels to ensure two-handed operation for all critical functions.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per subsea BOP system inspected.

## **BOP TESTS, ACTUATORS, INSPECTIONS, AND MAINTENANCE**

**DEFINITION:**  
**BOP System and Auxiliary Equipment** - See Appendix 23

**D-250** **HAVE ALL BOP SYSTEM COMPONENTS BEEN SUCCESSFULLY TESTED TO A LOW PRESSURE OF 200 PSI TO 300 PSI PRIOR TO CONDUCTING HIGH-PRESSURE TESTS?**  
**Authority:** 30 CFR 250.448(a) **Enforcement Action:** W/S  
**Note:** If the initial pressure exceeds 500 psi, you must bleed back to zero and re-initiate the test. Any initial pressure above 300 psi must be bled back to a pressure between 200 and 300 psi before starting the test.  
**INSPECTION PROCEDURE:**  
1. Verify that a low-pressure test on BOP equipment was conducted prior to a high-pressure test and the test was conducted in accordance with the specified requirements (see Appendix 23).  
2. If inspection is being performed during commencement of testing of BOP system, confirm Operator’s compliance with low-pressure testing requirements.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if a low-pressure test was not adequately conducted, but subsequently performed successfully.  
Issue a rig shut-in (S) INC when records indicate a low-pressure test was not performed prior to a high- pressure test and/or the test was not performed as required (see Appendix 23).  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.

- D-251**      **ARE RAM-TYPE BOPS, CHOKES, MANIFOLDS, AND OTHER BOP EQUIPMENT HIGH PRESSURE TESTED TO A PRESSURE EQUAL TO THE RATED WORKING PRESSURE OF THE EQUIPMENT OR TO A PRESSURE APPROVED IN THE APD?**  
**Authority: 30 CFR 250.448(b)**      **Enforcement Action: W/S**  
**INSPECTION PROCEDURE:**  
1. Verify that all BOP components were high pressure tested to the rated working pressure of the equipment or approved in the APD.  
2. If inspection is performed during testing, confirm Operator's compliance by witnessing the pressure tests.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the records indicate that a test was not adequately conducted, but subsequently performed successfully.  
Issue a rig shut-in (S) INC if the required tests have not been conducted.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per BOP system inspected.
- D-252**      **ARE SAFETY VALVES ACTUATED PRIOR TO RUNNING CASING AND RECORDED IN THE DRILLER'S REPORT?**  
**Authority: 30 CFR 250.449(i)**      **Enforcement Action: W**  
                    **30 CFR 250.450**  
**Note:** A low torque valve attached to a swedge with compatible connections is acceptable.  
**INSPECTION PROCEDURE:**  
1. Visually witness actuation of safety valves prior to running casing.  
2. Inspect records to ensure the valve was actuated.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if records indicate that safety valves are not actuated prior to the casing being run.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-253**      **ARE SURFACE AND SUBSEA BOP SYSTEMS PRESSURE TESTED, BEFORE DRILLING OUT EACH STRING OF CASING OR LINER, OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER?**  
**Authority: 30 CFR 250.447(c)**      **Enforcement Action: W/S**  
**INSPECTION PROCEDURE:**  
1. Inspect Driller's report to verify that the tests were conducted before drilling out after each string of casing or liner.  
2. If tests are performed during inspection, witness and verify a successful test.  
**Note:** This test can be omitted if approved in the APD.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the BOP systems are not tested before drilling out each string of casing or liner without testing and subsequent tests were performed successfully.  
Issue a rig shut-in (S) INC if the casing or liner has been set and the Operator is preparing to drill out without performing tests.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.
- D-254**      **WHEN THE BOP TESTS ARE POSTPONED DUE TO WELL CONTROL PROBLEMS, IS THE BOP TEST PERFORMED ON THE FIRST TRIP OUT OF THE HOLE, AND ARE THE SPECIFIC REASONS FOR POSTPONING THE TESTING RECORDED IN THE DRILLER'S REPORT OR REFERENCE DOCUMENTS?**  
**Authority: 30 CFR 250.451(c)**      **Enforcement Action: W**  
**INSPECTION PROCEDURE:**  
1. Check Driller's report or reference documents to determine why tests were postponed.  
2. Valid reasons for postponing pressure tests include:  
    A. Lost circulation.  
    B. Formation fluid influx.  
    C. Stuck drill pipe.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if reason for postponing tests was not entered in Driller's report or reference documents.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each well inspected.

**D-256 ARE ANNULARS AND RAM BOP'S FUNCTION TESTED EVERY 7 DAYS BETWEEN PRESSURE TESTS?**

**Authority:** 30 CFR 250.449(h)

**Enforcement Action:** W/S

**Note:** Approval may be obtained not to function test blind rams if no trip is performed between tests.

**INSPECTION PROCEDURE:**

1. Verify that annular and ram BOP's have been function tested every 7 days 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 successfully.

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

**INSPECTION COUNT/ INC COUNT:**

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

**D-257 ARE VARIABLE-BORE PIPE RAMS PRESSURE TESTED AGAINST THE LARGEST AND SMALLEST SIZES OF PIPE IN USE, EXCLUDING DRILL COLLARS AND BOTTOM-HOLE TOOLS?**

**Authority:** 30 CFR 250.449(f)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. If inspection is performed during testing, confirm operator compliance by witnessing test.
2. Inspect records for verification that tests have been conducted.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if past test has not been conducted but a subsequent test has been conducted successfully.

Issue a rig shut-in (S) INC if test has not been conducted successfully.

**INSPECTION COUNT/ INC COUNT:**

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

**D-258 ARE AFFECTED BOP COMPONENTS PRESSURE TESTED FOLLOWING DISCONNECTION OR REPAIR OF ANY WELL-PRESSURE CONTAINMENT SEAL IN THE WELLHEAD OR BOP STACK ASSEMBLY?**

**Authority:** 30 CFR 250.449(g)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

If repairs required disconnection of pressure seals, verify tests on affected equipment were conducted successfully.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC where drilling operations commenced without conducting tests on the seals but subsequent BOP tests were conducted successfully.

Issue a rig shut-in (S) INC when pressure seal tests were not conducted successfully following repairs.

**INSPECTION COUNT/ INC COUNT:**

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

**D-259 ARE THE BOP SYSTEMS VISUALLY INSPECTED EACH DAY FOR SURFACE STACKS OR AT LEAST ONCE EVERY 3 DAYS FOR SUBSEA STACKS AND DOCUMENTED IN THE DRILLER'S REPORT?**

**Authority:** 30 CFR 250.446(b)

**Enforcement Action:** W

**30 CFR 250.450**

**Note:**

1. Daily inspections do not apply to casing risers.
2. Weather and sea conditions are allowable reasons for not inspecting subsea BOP systems and marine risers at least once every 3 days.

**INSPECTION PROCEDURE:**

Verify that the BOP systems and marine risers have been visually inspected within requirements by checking the Driller's report.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the Operator cannot verify that the BOP system is visually inspected as required.

**INSPECTION COUNT/ INC COUNT:**

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



- D-264** **DOES THE DOCUMENTATION INDICATE THE SEQUENTIAL ORDER OF BOP AND AUXILIARY EQUIPMENT TESTING, THE PRESSURE AND DURATION OF EACH TEST; FOR SUBSEA BOP SYSTEMS, ARE THE CLOSING TIMES FOR ANNULAR(S) AND RAM BOPS RECORDED?**  
**Authority:** 30 CFR 250.450(c) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
1. Check the driller's report or referenced document to verify that the sequential order of BOP and auxiliary equipment testing, and the pressure and duration of each test is recorded.  
2. For subsea BOP systems, verify the closing times for the annular(s) and ram BOPs are recorded.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the documentation does not indicate the sequential order of BOP and auxiliary equipment testing, the pressure, duration of each test, and for subsea systems, if required closing times are not recorded.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-265** **IS THE CONTROL STATION AND POD USED DURING THE BOP SYSTEM TESTING IDENTIFIED IN THE DRILLER'S REPORT OR REFERENCED BOP TEST PLAN?**  
**Authority:** 30 CFR 250.450(c) **Enforcement Action:** W  
30 CFR 250.450(d)  
**INSPECTION PROCEDURE:**  
Check the Driller's report or referenced document to verify that the control station and pod used during the BOP system testing is identified.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the control station and pod used during the BOP system testing is not identified in the Driller's report or referenced BOP test plan.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-266** **ARE ANY PROBLEMS OR IRREGULARITIES OBSERVED DURING BOP SYSTEM TESTING IDENTIFIED AND ARE THE ACTIONS TAKEN TO REMEDY SUCH PROBLEMS OR IRREGULARITIES RECORDED?**  
**Authority:** 30 CFR 250.450(e) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Check the Driller's report or referenced document to verify that problems or irregularities observed during BOP system testing and actions taken to remedy such problems or irregularities are recorded.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if problems or irregularities observed during the testing of BOP system and actions taken to remedy such problems or irregularities are not recorded in the Driller's report or referenced documents.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-267** **ARE ALL RECORDS INCLUDING PRESSURE CHARTS, DRILLER'S REPORT, AND REFERENCED DOCUMENTS OF BOP TESTS, ACTUATIONS, AND INSPECTIONS AVAILABLE AT THE FACILITY FOR THE DURATION OF THE DRILLING ACTIVITY?**  
**Authority:** 30 CFR 250.450(f) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify that all records including pressure charts, Driller's report, and referenced documents of BOP tests, actuations, and inspections are available at the facility for the duration of the drilling activity.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if all records of BOP tests, actuations, and inspections including pressure charts, driller's report, and referenced documents are not available at the facility for the duration of the drilling activity.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-268** **ARE ALL RECORDS RELATING TO CASING AND LINER PRESSURE TESTS, DIVERTER TESTS AND BOP TESTS RETAINED FOR A PERIOD OF TWO YEARS AFTER COMPLETION OF THE DRILLING OPERATIONS?**  
**Authority:** 30 CFR 250.467(b) **Enforcement Action:** W INSPECTION  
**PROCEDURE:**  
Verify that all such records are available as required during entire drilling operation.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the records are not available as required.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.



D-273

**ARE SURFACE BOP SYSTEMS PRESSURE TESTS BEGUN BEFORE 14 DAYS HAVE ELAPSED SINCE THE LAST BOP PRESSURE TEST WAS COMPLETED, ALTERNATING BETWEEN CONTROL STATIONS?**

**Authority:** 30 CFR 250.447(b)  
30 CFR 250.449(c)

**Enforcement Action:** W/S

**DEFINITION:**

**BOP System and Auxiliary Equipment** - See Appendix 23

**Note:** A 14-day pressure test is not required for blind and blind-shear rams.

**INSPECTION PROCEDURE:**

1. Inspect Driller's report to verify that pressure tests begun before 14 days had elapsed since the last BOP pressure test was completed.
2. Verify control stations are alternated between tests.
3. Operations permitting, witness proper operation of control stations.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when records indicate previous tests exceeding the 14-day interval requirement without acceptable explanation in Driller's report, but successful subsequent tests met 14-day interval requirement; or if in previous tests the control stations were not alternated as required, but were successfully alternated in subsequent tests.

Issue a rig shut-in (S) INC when date of most recent tests exceeds 14-day interval or if a control station was not alternated as required.

**INSPECTION COUNT/ INC COUNT:**

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

D-274

**ARE THE BONNET SEALS TESTED BEFORE RUNNING THE CASING WHEN CASING RAMS ARE INSTALLED IN THE BOP STACK?**

**Authority:** 30 CFR 250.451(f)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the bonnet seals were pressure tested prior to running casing.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if bonnet seals were not tested and a subsequent test was performed successfully.

**INSPECTION COUNT/ INC COUNT:**

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

### **SUBSEA BOP TESTS**

D-281

**ARE SUBSEA BOP SYSTEM COMPONENTS STUMP PRESSURE TESTED AT THE SURFACE WITH WATER TO THEIR RATED WORKING PRESSURE?**

**Authority:** 30 CFR 250.449(b)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Verify that required BOP stump pressure tests were performed successfully prior to installation.
2. If inspection is being performed when stump pressure tests are being conducted, witness the tests as conditions and time permit.
3. Verify the surface stump pressure tests were conducted with water.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if the BOP was not stump pressure tested prior to commencing drilling operations, performed with water but a successful seafloor test was completed.

Issue a rig shut-in (S) INC when installation of the BOP stack on the seafloor has commenced, drilling operations have not begun, and the BOP has not been stump pressure tested.

**INSPECTION COUNT/ INC COUNT:**

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

D-282

**ARE SUBSEA ANNULAR-TYPE BOPS STUMP PRESSURE TESTED AT THE SURFACE WITH WATER TO 70 PERCENT OF THEIR RATED WORKING PRESSURE OR TO THE PRESSURE IN THE APPROVED APD?**

**Authority:** 30 CFR 250.448(c)

**Enforcement Action:** W/S

**INSPECTION PROCEDURE:**

1. Verify that required annular-type BOP stump pressure tests were performed successfully prior to installation.
2. If inspection is being performed when stump pressure tests are being conducted, witness the tests as conditions and time permit.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if the BOP was not stump tested prior to commencing drilling operations. Issue a rig shut-in (S) INC when installation of the BOP stack on the seafloor has commenced, drilling operations have not begun, and the BOP has not been stump tested.

**INSPECTION COUNT/ INC COUNT:**

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



D-283

**WAS THE SUBSEA BOP STACK PRESSURE TESTED AFTER INSTALLATION?**

**Authority:** 30 CFR 250.447(a)  
30 CFR 250.448(c)  
30 CFR 250.449(b)

**Enforcement Action:** W/S

**Note:** Annular BOP shall be tested to 70 percent of the rated working pressure or to the pressure in the approved APD.

**INSPECTION PROCEDURE:**

1. Verify that required initial BOP pressure tests were performed within 30 days of the stump pressure test.
2. If inspection is being performed when initial testing of BOP stack is in progress just after latch-up, witness the tests.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when drilling operations commenced prior to a required successful initial BOP pressure test, but subsequent successful BOP pressure tests have been performed.

Issue a rig shut-in (S) INC when installation has been completed, the initial BOP pressure tests have not been performed, drilling operations have commenced, and subsequent successful BOP pressure tests have not been performed.

**INSPECTION COUNT/ INC COUNT:**

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

D-285

**DID THE BOP SYSTEMS PRESSURE TESTING BEGIN BEFORE 14 DAYS HAD ELAPSE SINCE THE LAST BOP TEST, ALTERNATING BETWEEN CONTROL STATIONS AND PODS?**

**Authority:** 30 CFR 250.447(b)  
30 CFR 250.449(c)

**Enforcement Action:** W/S

**Note:** Verify BOP testing began before midnight on the 14<sup>th</sup> day following the conclusion of the previous BOP test.

**DEFINITION:**

**BOP System and Auxiliary Equipment** - See Appendix 23.

**INSPECTION PROCEDURE:**

Verify that required BOP pressure testing begins before 14 days are exceeded between tests, alternating between control stations and pods.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when records indicate successful BOP pressure tests other than most recent test exceeded the 14-day interval requirement without acceptable explanation in Driller's report.

Issue a rig shut-in (S) INC when:

1. Date of most recent BOP pressure tests exceeds 14 days and acceptable explanation is not entered in Driller's report.
2. A control station or pod is inspected and found to be inoperable.
3. Control station or pod is found not to be tested alternatively.

**INSPECTION COUNT/ INC COUNT:**

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

## WELL-CONTROL DRILLS

D-290

**ARE WELL-CONTROL DRILLS CONDUCTED FOR EACH DRILLING CREW AND RECORDED IN THE DRILLER'S REPORT?**

**Authority:** 30 CFR 250.462  
30 CFR 250.462(c)

**Enforcement Action:** W

**Note:**

1. Well-control drills conducted:
  - A. Must be designed to acquaint each crew member with their function during a well-control event so that each member can perform his/ her assignment promptly and efficiently.
  - B. Must be performed at least once each week (well conditions permitting) with each crew.
  - C. Must include on-bottom drilling, tripping, and diverter drills.
  - D. Refer to Appendix 22 Well-Control Drill Requirements.
2. After consulting with the Company Representative, BSEE representative may require the operator to conduct a well control drill contingent on safety of the wellbore status and rig operations.

**INSPECTION PROCEDURE:**

Verify that each crew has performed a weekly well-control drill according to the well-control drill plan, and the drill was documented in the Driller's report.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when well-control drills have not been documented properly or previous drills were not properly conducted with subsequent successful drills.

**INSPECTION COUNT/ INC COUNT:**

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

**D-291** **IS A COPY OF THE COMPLETE WELL-CONTROL DRILL PLAN POSTED ON THE RIG FLOOR OR BULLETIN BOARD?**  
**Authority:** 30 CFR 250.462(a) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify that a complete well control plan has been posted on the rig floor and/ or bulletin board.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC when plan is not posted.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.

**D-292** **ARE DRILLS CONDUCTED IN ACCORDANCE WITH THE WELL CONTROL DRILL PLAN?**  
**Authority:** 30 CFR 250.462 **Enforcement Action:** W  
30 CFR 250.462(a)  
30 CFR 250.462(b)  
**DEFINITION:** See Appendix 22  
**Well Control Drill Plan** - A document posted on the rig floor and/ or bulletin board that is applicable to the particular site and is prepared for each crew member outlining the assignments each is to fulfill during the well-control drill. The plan will also establish a prescribed time for the completion of each portion of the drill.  
**INSPECTION PROCEDURE:**  
1. If a drill is performed during an inspection, observe the drill to verify that drill crew members carry out their assignments according to the well control plan for the site.  
2. Verify all crew members participating in the drill are conducting their individual roles and functions promptly and efficiently.  
3. Verify the time required for the crew to complete the drill is in accordance with the established time prescribed in the well control plan.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC when observed well control drills are not conducted according to the well control plan and/ or crew members are not familiar with their roles and functions capable to perform their duties promptly and efficiently.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.

## **DIVERTER SYSTEMS**

**D-300** **WHEN DRILLING A CONDUCTOR OR SURFACE HOLE, IS THE DRILLING UNIT EQUIPPED WITH A DIVERTER SYSTEM CONSISTING OF A DIVERTER SEALING ELEMENT, DIVERTER LINES, AND CONTROL SYSTEMS?**  
**Authority:** 30 CFR 250.430 **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Verify that the drilling unit is equipped with a diverter system consisting of a sealing element, diverter lines, and control systems.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if drilling unit is not equipped with diverter and related equipment.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.

**D-301** **IS THE DIVERTER SYSTEM EQUIPPED WITH FULL OPENING REMOTE CONTROLLED VALVES IN THE FLOW AND VENT LINES THAT CAN BE OPERATED FROM AT LEAST ONE REMOTE CONTROL STATION IN ADDITION TO THE ONE ON THE DRILLING FLOOR?**  
**Authority:** 30 CFR 250.431(c) **Enforcement Action:** S  
30 CFR 250.431(d)  
**INSPECTION PROCEDURE:**  
1. Inspect flow and vent lines for remotely controlled valves.  
2. Inspect flow and vent lines to ensure that manual or butterfly valves are not installed in any part of the diverter system.  
3. Inspect for a remote control station in addition to the one on the drill floor.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if flow and vent lines do not have remotely controlled valves that can be operated from a remote station.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.

- D-302** **ARE THE DIVERTER SEALING ELEMENT, DIVERTER VALVES, AND DIVERTER CONTROL SYSTEMS, INCLUDING THE REMOTE CONTROL SYSTEM, ACTUATION TESTED AND THE VENT LINES FLOW TESTED WHEN INSTALLED?**  
**Authority:** 30 CFR 250.433 **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify that all diverter equipment is actuation tested when initially installed.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if equipment has not been actuation tested upon installation, but a subsequent actuation test was completed successfully.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.
- D-305** **ARE ALL RIGHT ANGLE AND SHARP TURNS IN THE DIVERTER LINES TARGETED?**  
**Authority:** 30 CFR 250.431(e) **Enforcement Action:** S **DEFINITION:**  
**Targeted** - The building up or reinforcing of a right angle or sharp turn in a line where the fluid or solids in a fluid are likely to erode the upstream side of the turn. Only one 90-degree turn allowed for each line for bottom founded drilling units.  
**INSPECTION PROCEDURE:**  
Verify that all right angle and sharp turns are targeted and surface diverter configurations do not have more than one right angle turn per diverter spool outlet.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if lines are not targeted and/ or more than one right angle turn per diverter spool outlet exists.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.
- D-306** **IF FLEXIBLE HOSE IS USED FOR DIVERTER LINES, DOES IT HAVE INTEGRAL END COUPLINGS?**  
**Authority:** 30 CFR 250.432(a) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Verify that flexible hose has integral end couplings.  
2. Verify that the use of flexible hose for diverter lines is addressed in the approved APD.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if:  
1. Flexible hose is not equipped with integral end couplings.  
2. Use of flexible hose was not approved by the District Manager.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.
- D-307** **IS THE ENTIRE DIVERTER SYSTEM ANCHORED AND SUPPORTED TO PREVENT WHIPPING AND VIBRATION?**  
**Authority:** 30 CFR 250.431(f) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Verify that the diverter system is properly secured.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if the diverter system is capable of vibration or whipping.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.
- D-308** **ARE ALL DIVERTER CONTROL INSTRUMENTS AND LINES PROTECTED FROM PHYSICAL DAMAGE FROM THROWN OR FALLING OBJECTS?**  
**Authority:** 30 CFR 250.431(g) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Verify that diverter control instruments and lines are protected from damage from thrown or falling objects.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if equipment is subject to any damage from thrown or falling objects.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.

- D-309 ARE ALL DIVERTER PRESSURE TESTS, FLOW TESTS, AND ACTUATION RESULTS RECORDED IN THE DRILLER'S REPORT?**  
**Authority:** 30 CFR 250.433 **Enforcement Action:** W  
30 CFR 250.434  
**Note:** Flow tests and actuation tests are required for both surface and subsea wellhead systems, but pressure tests are required for only surface wellhead systems.  
**INSPECTION PROCEDURE:**  
Verify that all successful tests are recorded.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if results of tests are not recorded.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection
- D-311 ARE BRANCH LINES INSTALLED TO PROVIDE DOWNWIND DIVERSION CAPABILITY, IF THE DIVERTER SYSTEM UTILIZES ONLY ONE SPOOL OUTLET?**  
**Authority:** 30 CFR 250.432(b)(1) **Enforcement Action:** S  
30 CFR 250.432(b)(2)  
**INSPECTION PROCEDURE:**  
1. Verify downwind diversion capability.  
2. Verify that the use of only one spool outlet for the diverter system is addressed in the approved APD.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if:  
1. Downwind diversion capability is not provided.  
2. Use of only one spool outlet in the diverter system was not approved by the District Manager.  
3. Failure to obtain departure approval from District Manager as needed prior to operations.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.
- D-312 IS EACH DIVERTER PRESSURE TEST RECORDED ON A PRESSURE CHART?**  
**Authority:** 30 CFR 250.434(a) **Enforcement Action:** W/S  
**Note:** Only for surface wellhead systems.  
**INSPECTION PROCEDURE:**  
Verify that the diverter tests were properly recorded on pressure charts.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if a pressure test was missed but a subsequent successful pressure test was performed or if the diverter is no longer installed.  
Issue a rig shut-in (S) INC if the last pressure test was not recorded on a pressure chart and the rig is still utilizing the diverter system.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-313 HAS THE ONSITE REPRESENTATIVE CERTIFIED (SIGNED AND DATED) THE DIVERTER PRESSURE CHART AS CORRECT?**  
**Authority:** 30 CFR 250.434(b) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify that charts are certified.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the charts are not certified as correct.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-314 IS THE CONTROL STATION USED DURING THE DIVERTER TEST OR ACTUATION IDENTIFIED?**  
**Authority:** 30 CFR 250.434(c) **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify which control station was used.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the records do not indicate which control station was used.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.

## SURFACE DIVERTER SYSTEMS

- D-315**      **ARE PROBLEMS OR IRREGULARITIES OBSERVED DURING DIVERTER TESTING OR ACTUATION, AND THE REMEDIES TO CORRECT PROBLEMS RECORDED IN THE DRILLER'S REPORT?**  
**Authority:** 30 CFR 250.434(d)      **Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify all that problems, irregularities, and remedies are recorded in the Driller's report.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if problems, irregularities, or remedies are not recorded in the Driller's report.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-316**      **ARE PRESSURE CHARTS AND REPORTS PERTAINING TO THE DIVERTER TESTS AND ACTUATIONS RETAINED AT THE RIG FOR THE DURATION OF DRILLING THE WELL? Authority:** 30 CFR 250.434(e)  
**Enforcement Action:** W  
**INSPECTION PROCEDURE:**  
Verify that all charts and reports are kept on the rig for the duration of drilling the well.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if charts and reports are not kept on the rig.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.
- D-317**      **IS THE DIVERTER SYSTEM DESIGNED, INSTALLED, USED, MAINTAINED, AND TESTED TO ENSURE PROPER DIVERSION OF GASES, WATER, DRILLING FLUIDS, AND OTHER MATERIALS AWAY FROM FACILITIES AND PERSONNEL BEFORE DRILLING CONDUCTOR OR SURFACE HOLE?**  
**Authority:** 30 CFR 250.430      **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
1. Verify that the diverter actuating system which is installed in compliance with the APD..  
2. Verify that the accumulator system provides sufficient capacity to close the diverter system upon installation before drilling conductor or surface hole.  
3. Witness the proper automatic operation of the charging system.  
4. Check the system for leaks.  
5. Verify the diverter system properly diverts wellbore materials in a safe direction.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC when the diverter system does not have sufficient capability and/ or is not installed as required and permitted.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked / issue one INC per diverter system inspected.
- D-322**      **IS THE SPOOL OUTLET AND DIVERTER LINE NOMINAL DIAMETER AT LEAST 10 INCHES FOR SURFACE WELLHEAD CONFIGURATIONS AND AT LEAST 12 INCHES FOR FLOATING DRILLING OPERATIONS?**  
**Authority:** 30 CFR 250.431(a)      **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Verify that the spool outlet and diverter line nominal diameter is properly sized.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if the nominal diameter of the spool outlet and diverter line is not properly sized.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.
- D-324**      **ARE BOTH OUTLETS PIPED TO PROVIDE DOWNWIND DIVERSION CAPABILITY, IF DUAL SPOOL OUTLETS ARE UTILIZED?**  
**Authority:** 30 CFR 250.431(b)      **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Verify that spool outlets are piped to provide downwind diversion.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if both outlets are not piped to provide downwind diversion.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per diverter system inspected.

D-326

**ARE DIVERTER SEALING ELEMENTS AND DIVERTER VALVES PRESSURE TESTED TO A MINIMUM OF 200 PSI WHEN NIPILED UP ON CONDUCTOR CASING, WITH NO MORE THAN 7 DAYS ELAPSED TIME BETWEEN SUBSEQUENT TESTS?**

**Authority:** 30 CFR 250.433(a)

**Enforcement Action:** W/S **Note:** Pressure test

not required on subsea wellhead diverter systems.

**INSPECTION PROCEDURE:**

Verify that diverter sealing elements and diverter valves are pressure tested successfully to a minimum of 200 psi with no more than 7 days between tests,

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if records indicate the following and the diverter is no longer installed:

1. Diverter sealing elements and diverter valves were not pressure tested to a minimum of 200 psi when nipped up on conductor casing.
2. More than 7 days elapsed between successful subsequent tests.

Issue a rig shut-in (S) INC if the diverter is installed and has not been tested or more than 7 days have elapsed since last successful pressure test.

**INSPECTION COUNT/ INC COUNT:**

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

D-327

**ARE ACTUATION TESTS OF THE DIVERTER SEALING ELEMENT, DIVERTER VALVES, AND DIVERTER CONTROL SYSTEMS, INCLUDING THE REMOTE CONTROL SYSTEM, CONDUCTED AT LEAST ONCE EVERY 24 HOUR PERIOD ALTERNATING BETWEEN CONTROL STATIONS FOR SURFACE DIVERTER SYSTEMS?**

**Note:** Subsea wellhead diverters must be actuated once every seven days.

**Authority:** 30 CFR 250.433(a)

**Enforcement Action:** W

30 CFR 250.433(c)

**INSPECTION PROCEDURE:**

Verify that actuation tests alternating between control stations are being conducted once every 24 hour period and the tests include all required equipment.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if records indicate that surface diverter system equipment has not been actuation tested successfully at least once during every 24 hour period, but subsequent successful tests have been completed..

**INSPECTION COUNT/ INC COUNT:**

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

D-334

**IF A SINGLE DIVERTER LINE IS IN USE ON A DYNAMICALLY POSITIONED FLOATING DRILLING RIG, IS VESSEL HEADING MAINTAINED TO ALLOW FOR DOWNWIND DIVERSION?**

**Authority:** 30 CFR 250.432(d)

**Enforcement Action:** S

**INSPECTION PROCEDURE:**

Verify that downwind diversion can be or is being maintained.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC until vessel heading is changed to allow for downwind diversion.

**INSPECTION COUNT/ INC COUNT:**

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

## DRILLING FLUID PROGRAM

**D-400 HAS DRILLING FLUID BEEN PROPERLY CONDITIONED BY CIRCULATION BEFORE STARTING OUT OF THE HOLE WITH DRILL PIPE, OR IS THERE PROPER DOCUMENTATION IN THE DRILLER'S REPORT THAT CIRCULATION WAS NOT NECESSARY?**

**Authority:** 30 CFR 250.456(a)

**Enforcement Action:** W **DEFINITIONS:**

**Properly Conditioned** - Drilling fluid which has been circulated bottoms up and drilling fluid volume going into the borehole essentially equals the drilling fluid volume coming out of the borehole.

**INSPECTION PROCEDURE:**

Verify that the drilling fluid has been properly conditioned or proper documentation shows circulation was not necessary before starting out of the hole.

**Note:**

1. Examples of verification are:
  - A. Well not flowing prior to pulling out of the hole.
  - B. Drilling fluid weight in is equal to drilling fluid weight out within 0.2 ppg (1.5 pcf).
2. If drilling fluid weight out is lighter than drilling fluid weight in by more than 0.2 ppg (1.5 pcf), drilling fluid shall be circulated bottoms up, and rechecked for flow and weight properties.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when records indicate that the drilling fluid has not been properly conditioned by circulation before starting out of the hole or there is no documentation that circulation was not necessary. **INSPECTION COUNT/ INC COUNT:**

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

**D-401 WHEN COMING OUT OF THE HOLE WITH DRILL PIPE, IS THE ANNULUS FILLED WITH DRILLING FLUID BEFORE THE CHANGE IN DRILLING FLUID DECREASES THE HYDROSTATIC PRESSURE BY 75 PSI, OR EVERY FIVE STANDS OF DRILL PIPE, WHICHEVER GIVES A LOWER DECREASE IN HYDROSTATIC PRESSURE?**

**Authority:** 30 CFR 250.456(c)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that the hole is properly filled before pulling 5 stands or before 75 psi decrease in wellbore hydrostatic pressure (whichever comes first).

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC:

1. When records indicate rig was not properly filling the wellbore while tripping pipe, but proper fluid volumes and weight has subsequently been achieved.
2. When more than the posted number of stands are pulled or more than a 75 psi decrease has occurred in wellbore hydrostatic pressure and hole is not properly filled.

**INSPECTION COUNT/ INC COUNT:**

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

**D-402 HAS THE NUMBER OF STANDS OF DRILL PIPE AND DRILL COLLARS THAT MAY BE PULLED PRIOR TO FILLING THE HOLE AND THE EQUIVALENT DRILLING FLUID VOLUME NEEDED TO FILL THE HOLE BEEN CALCULATED AND HAVE BOTH BEEN POSTED NEAR THE DRILLER'S STATION?**

**Authority:** 30 CFR 250.456(c)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

1. Verify that drill pipe and drill collars in use have been calculated for equivalent displacement capacities.
2. Verify the number of stands of drill pipe and drill collars have been calculated that may be pulled prior to filling hole and are recorded near the Driller's station.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when these volumes are not posted near the Driller's station.

**INSPECTION COUNT/ INC COUNT:**

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







D-412

**ARE DRILLING FLUID RETURN INDICATOR DEVICES, WHICH INDICATE THE RELATIONSHIP BETWEEN DRILLING FLUID RETURN FLOW RATE AND PUMP DISCHARGE RATE, INSTALLED WITH VISUAL AND AUDIBLE WARNING ALARMS?**

**Authority:** 30 CFR 250.457(c)

**Enforcement Action:** S

**INSPECTION PROCEDURE:**

1. Verify the installation of the drilling fluid return device.
2. Witness the operation of the indicator by actuation of the drilling fluid return sensing device.
3. Verify an indicator is installed on the rig floor

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC when a drilling fluid return indicator is not installed and operational as required.

**INSPECTION COUNT/ INC COUNT:**

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

D-413

**IS OPERABLE GAS DETECTING EQUIPMENT INSTALLED TO MONITOR DRILLING FLUID RETURNS, WITH THE REQUIRED TYPE OF INDICATORS LOCATED ON THE RIG FLOOR OR IN A CONTINUOUSLY MANNED DRILLING FLUID LOGGING UNIT HAVING IMMEDIATE COMMUNICATION WITH THE RIG FLOOR?**

**Authority:** 30 CFR 250.457(d)

**Enforcement Action:** S

**Note:** A gas detector indicator, located on the rig floor only, must have an audible alarm.

**INSPECTION PROCEDURE:**

1. Verify the installation of a gas detection system.
2. Witness operation of the gas detection system by application of gas sample to the sensing head(s).

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC when an operable gas detection system is not installed as required.

**INSPECTION COUNT/ INC COUNT:**

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

D-414

**ARE MINIMUM QUANTITIES OF DRILLING FLUID AND DRILLING FLUID MATERIALS, INCLUDING WEIGHT MATERIALS, MAINTAINED AT THE DRILL SITE AS NECESSARY TO ENSURE WELL CONTROL; AND IF NOT, ARE DRILLING OPERATIONS SUSPENDED?**

**Authority:** 30 CFR 250.418(b)

**Enforcement Action:** W/S

30 CFR 250.458(a)

30 CFR 250.458(c)

**INSPECTION PROCEDURE:**

1. Compare permit approved quantities to records of actual quantities maintained to assure compliance.
2. Verify the quantity of drilling fluid material onsite.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if records indicate that drilling operations were conducted previously without at least the minimum quantities of drilling fluid materials maintained onsite.

Issue a rig shut-in (S) INC if records inspection or visual inspection indicates minimum quantities of drilling fluid materials are not available onsite during drilling operations.

**INSPECTION COUNT/ INC COUNT:**

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

D-415

**ARE RECORDS OF DAILY INVENTORIES OF DRILLING FLUID AND DRILLING FLUID MATERIALS MAINTAINED AT THE WELL SITE?**

**Authority:** 30 CFR 250.458(b)

**Enforcement Action:** W

**INSPECTION PROCEDURE:**

Verify that inventories are recorded daily in the drilling fluid report.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if inventories are not recorded.

**INSPECTION COUNT/ INC COUNT:**

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

D-416

**BEFORE DISPLACING KILL-WEIGHT DRILLING FLUID FROM THE WELLBORE AND/ OR RISER, DID OPERATOR OBTAIN APPROVAL FROM THE DISTRICT MANAGER WITH SUBMITTAL OF REQUIRED PROCEDURES?**

**Authority:** 30 CFR 250.456(j)  
30 CFR 250.420(b)(3)

**Enforcement Action:** S

**INSPECTION PROCEDURE:**

Check records to verify that:

1. Approval from District Manager included reasons for displacing kill-weight drilling fluid and had a detailed step-by-step written procedure for conducting the displacement.
2. Step-by-step displacement procedures address the following:
  - A. Number and type of independent barriers that are in place for each flow path.
  - B. Tests conducted to ensure integrity of independent barriers.
  - C. BOP procedures used while displacing kill-weight fluids.
  - D. Procedures used to monitor volumes and rates of fluids entering and leaving the wellbore.

**Note:** Records must be made available during inspection.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) if operator did not receive approval from District Manager before displacing kill-weight drilling fluid from the wellbore and/ or procedures are not being utilized properly.

**INSPECTION COUNT/ INC COUNT:**

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

**DRILLING FLUID-HANDLING AREAS**

**(CLASSIFIED AS WHERE DANGEROUS CONCENTRATIONS OF COMBUSTIBLE GAS MAY ACCUMULATE)**

D-421

**IF NOT CONTINUOUSLY ACTIVATED, ARE MECHANICAL VENTILATION SYSTEMS ACTIVATED ON SIGNAL FROM GAS DETECTORS THAT ARE OPERATIONAL AT ALL TIMES INDICATING THE PRESENCE OF 1 PERCENT OR MORE OF COMBUSTIBLE GAS BY VOLUME?**

**Authority:** 30 CFR 250.459(a)(2)

**Enforcement Action:** S

**DEFINITION:**

**Classified Area** - Identified in Appendix 21.

**Gas Detectors** - Must be capable of indicating the presence of 1 percent of combustible gas by volume.

**INSPECTION PROCEDURE:**

1. Identify enclosed, classified drilling fluid-handling areas.
2. Verify if a ventilation system is not continuously activated, classified areas have gas detectors that activate the ventilation system if gas is detected.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC if non-continuously activated ventilation systems do not have gas detectors that activate the system.

**INSPECTION COUNT/ INC COUNT:**

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

D-422

**ARE ALL CLASSIFIED DRILLING FLUID-HANDLING AREAS EQUIPPED WITH HIGH-CAPACITY MECHANICAL VENTILATION SYSTEMS UNLESS SUCH VENTILATION IS PROVIDED BY NATURAL MEANS?**

**Authority:** 30 CFR 250.459(a)(1)

**Enforcement Action:** S

**DEFINITION:**

**Enclosed Area** - Any area confined on more than four of its six possible sides by walls, floors, or ceilings more restrictive to air flow than grating or fixed open louvers and of sufficient size to allow entry of personnel.

**High Capacity Mechanical Ventilation System** - A system that is capable of replacing the air once every 5 minutes or 1.0 cubic feet of air-volume flow per minute per square foot of area, whichever is greater.

**INSPECTION PROCEDURE:**

1. Identify classified drilling fluid-handling areas.
2. Verify adequate ventilation.
3. If enclosed area exists, verify operable high capacity mechanical ventilation systems are installed with adequate means to replace air as required.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC if the drilling fluid-handling area does not have adequate ventilation by natural means and/ or the enclosed area is not equipped with a high-capacity ventilation system.

**INSPECTION COUNT/ INC COUNT:**

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







## **BOP SYSTEM MAINTENANCE/ INSPECTION/ CERTIFICATION**

- D-500**      **AFTER EACH WELL DRILLED, DID OPERATOR CLEAN, VISUALLY INSPECT, PERFORM PREVENTIVE MAINTENANCE, AND PRESSURE TEST ALL EQUIPMENT BEFORE INSTALLATION ON THE NEXT WELL IN ACCORDANCE WITH API RP 53 SECTIONS, 17.10 AND 18.10?**  
**Authority: 30 CFR 250.446(a)**      **Enforcement Action: S**  
**INSPECTION PROCEDURE:**  
Check records to verify that the operator cleaned, visually inspected, performed preventive maintenance, and pressure tested the well control equipment before installation on the next well for subsea stacks or before well operations on surface stacks.  
**Note:** Well control equipment applies to both surface and subsea.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut in (S) INC if operator did not clean, visually inspect, perform preventive maintenance, and pressure test the well control equipment before installation on the next well.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per subsea BOP system inspected.
- D-501**      **ARE ALL BOP STACKS, CHOKE MANIFOLDS, AND DIVERTER COMPONENTS DISASSEMBLED AND INSPECTED IN ACCORDANCE WITH THE EQUIPMENT MANUFACTURER’S GUIDELINES AFTER EVERY 3-5 YEARS OF SERVICE IN ACCORDANCE WITH API RP 53 SECTIONS, 17.10 AND 18.10?**  
**Authority: 30 CFR 250.446(a)**      **Enforcement Action: W/S**  
**INSPECTION PROCEDURE:**  
Verify documentation:  
  1. Elastomer components have been changed out.
  2. Surface finishes have been examined for wear and corrosion.
  3. Critical dimensions should be checked against the manufacturer’s allowable wear limits.
  4. A full internal and external inspection of the flexible choke and kill lines should be performed in accordance with the equipment manufacturer’s guidelines.**Note:**  
  1. Records must be maintained on the rig for two years from the date the records are created or longer if directed by BSEE.
  2. Date begins from the day the equipment is first in use (not a certification date).**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if the component (BOP, choke manifold, and diverter) has been found to be in violation, but is no longer in use.  
Issue a rig shut-in (S) INC when operator has not disassembled and inspected all BOP stacks, choke manifolds, and diverter components in accordance with the equipment manufacturer’s guidelines after every 3-5 years of service.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per inspection.
- D-502**      **ARE MANUFACTURER’S INSTALLATION, OPERATION, AND MAINTENANCE (IOM) MANUALS AVAILABLE ON THE RIG FOR ALL THE BOP EQUIPMENT INSTALLED ON THE RIG IN ACCORDANCE WITH API RP 53 SECTIONS, 17.11 AND 18.11?**  
**Authority: 30 CFR 250.446(a)**      **Enforcement Action: S**  
**INSPECTION PROCEDURE:**  
Verify manufacturer’s installation, operation, and maintenance (IOM) manuals are available on the rig for all the BOP equipment installed on the rig.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) INC if the manufacturer’s installation, operation, and maintenance (IOM) manuals are not available on the rig for all the BOP equipment installed on the rig.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per inspection.

**D-503** **IS A PLANNED MAINTENANCE SYSTEM, WITH EQUIPMENT IDENTIFIED, TASKS SPECIFIED, AND THE TIME INTERVALS BETWEEN TASKS STATED, EMPLOYED ON EACH RIG AND ARE THEY MAINTAINED ON FILE AT THE RIG SITE OR READILY AVAILABLE FOR THE APPLICABLE BOP EQUIPMENT IN ACCORDANCE WITH API RP 53 SECTIONS, 17.12 AND 18.12?**

**Authority: 30 CFR 250.446(a)**

**Enforcement Action: S**

**INSPECTION PROCEDURE:**

Verify that a planned maintenance system, with equipment identified, tasks specified, and the time intervals between tasks stated, employed on each rig and are maintained on file at the rig site or readily available for the applicable BOP equipment.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC if they are not following the planned maintenance system or a system is not in place and readily available for all applicable equipment.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per inspection.

**D- 504** **DOES OPERATOR MAINTAIN COPIES OF EQUIPMENT MANUFACTURERS' PRODUCT ALERTS OR EQUIPMENT BULLETINS AT THE RIG SITE IN ACCORDANCE WITH API RP 53 SECTIONS, 17.12 AND 18.12?**

**Authority: 30 CFR 250.446(a)**

**Enforcement Action: S**

**INSPECTION PROCEDURE**

Verify operator has copies of equipment manufacturers' product alerts or equipment bulletins at the rig site and readily made available to BSEE upon request.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) INC if operator does not have copies of equipment manufacturers' product alerts or equipment bulletins at the rig site and are not made available to BSEE upon request.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per inspection.

## **SUBSEA BOP SYSTEMS**

**D-600** **DID THE OPERATOR CLEARLY LABEL ALL CONTROL PANELS FOR THE SUBSEA BOP SYSTEM?**

**Authority: 30 CFR 250.442(h)**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify operator clearly labeled all control panels for the subsea BOP system.

**Note:** Verify the control panel is an accurate representation to properly indicate BOP system status.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC if operator did not clearly label all control panels for the subsea BOP system.

**INSPECTION COUNT/ INC COUNT:**

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

**D-601** **DID THE OPERATOR DEVELOP AND USE A MANAGEMENT SYSTEM FOR OPERATING THE SUBSEA BOP SYSTEM, WHICH INCLUDES PROCEDURES FOR PREVENTION OF ACCIDENTAL OR UNPLANNED DISCONNECTS OF SYSTEM?**

**Authority: 30 CFR 250.442(i)**

**Enforcement Action: S**

**INSPECTION PROCEDURE:**

1. Verify management has written procedures for operating BOP stack and LMRP (including techniques to prevent accidental disconnections of these components).
2. Verify management plan has minimum knowledge requirements for personnel authorized to operate and maintain BOP components with safe competency.
3. Check all remote BOP control stations for bypass to insure all BOP functions work as designed.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) if:

1. Operator does not have written procedures for operating BOP stack and LMRP (including techniques to prevent accidental disconnections of these components), and/ or personnel do not have minimum knowledge requirements to operate and maintain BOP components.
2. If any BOP control stations' functions are in bypass.

**INSPECTION COUNT/ INC COUNT:**

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



**D-602** **IF OPERATOR ACTIVATED BLIND SHEAR RAM OR CASING SHEAR RAM DURING A WELL CONTROL SITUATION IN WHICH PIPE OR CASING WAS SHEARED, DID THE OPERATOR RETRIEVE, PHYSICAL INSPECT AND CONDUCT A FULL PRESSURE TEST OF THE BOP STACK AFTER THE SITUATION WAS CONTROLLED?**  
**Authority:** 30 CFR 250.451(i) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Verify the operator retrieved, physically inspected, and conducted a full pressure test on the BOP stack.  
**Note:** Records must be made available during the inspection.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) if operator activated blind shear ram or casing shear ram during a well control situation in which pipe or casing was sheared and did not retrieve, physically inspect, and conduct a full pressure test on the BOP stack.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per subsea BOP system inspected.

**D-603** **ARE THERE A MINIMUM OF TWO BARRIERS IN PLACE PRIOR TO BOP REMOVAL?**  
**Authority:** 30 CFR 250.451(j) **Enforcement Action:** W/S  
**INSPECTION PROCEDURE:**  
Verify the quantity of barriers approved by District Manager to be installed before BOP removal.  
**Note:** The District manager may require additional barriers.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if approved number of barriers were not installed initially while BOP stack was removed, but BOP stack has been since reinstalled or approved number of barriers has been set in place.  
Issue a rig shut-in (S) INC if approved number of barriers are not installed.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per inspection.

**D-604** **ARE ACTUATION TESTS OF THE DIVERTER SEALING ELEMENT, DIVERTER VALVES, DIVERTER-CONTROL SYSTEMS, AND THE REMOTE CONTROL SYSTEM CONDUCTED AT LEAST ONCE EVERY 7 DAYS AFTER THE PREVIOUS ACTUCATION AND ALTERNATED BETWEEN CONTROL STATIONS FOR SUBSEA DIVERTER SYSTEMS?**  
**Authority:** 30 CFR 250.433(b) **Enforcement Action:** W/S  
30 CFR 250.433(c)  
**INSPECTION PROCEDURE:**  
Verify actuation tests are conducted at least once every 7 days and alternating between control stations.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a warning (W) INC if records indicate surface diverter system equipment has not been actuation tested at least once during every 7 days after the previous actuation, but subsequent test(s) were performed successfully.  
Issue a rig shut-in (S) INC if diverter has not been functioned within 7 days from the previous actuation at the time of the inspection and/ or if operator failed to alternate between stations as required.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC for each inspection.

## STUMP TEST

**D-610** **DID OPERATOR TEST ALL ROV INTERVENTION FUNCTIONS ON THE SUBSEA BOP STACK DURING THE STUMP TEST AND ARE TEST RESULTS MADE AVAILABLE TO BSEE UPON REQUEST?**  
**Authority:** 30 CFR 250.449(j) **Enforcement Action:** S  
**INSPECTION PROCEDURE:**  
Check records to verify:  
1. Operator conducted all ROV intervention function tests during the stump test.  
2. ROV hot stab was capable of actuating at a minimum one set of pipe rams, one set of blind shear rams, and unlatching the LMRP.  
3. Check records to verify operator tested the subsea BOP stack in accordance with the test procedures in the approved permit.  
4. Procedures are submitted to BSEE describing how each ROV intervention function will be tested.  
**IF NONCOMPLIANCE EXISTS:**  
Issue a rig shut-in (S) if operator did not conduct a stump test in accordance with the approved permit.  
**INSPECTION COUNT/ INC COUNT:**  
Enter one item checked/ issue one INC per subsea BOP system inspected.

**D-611 DID OPERATOR CONDUCT A FUNCTION TEST ON THE AUTOSHEAR AND DEADMAN SYSTEMS ON SUBSEA BOP STACK DURING THE STUMP TEST AND ARE TEST RESULTS MADE AVAILABLE TO BSEE UPON REQUEST?**

**Authority: 30 CFR 250.449(k)  
30 CFR 250.449(k)(2)**

**Enforcement Action: S**

**INSPECTION PROCEDURE:**

1. Verify proper function testing on autoshear and deadman systems is in accordance with the approved permit.
2. Records must be made available upon BSEE request.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) if operator did not conduct function test on autoshear and deadman systems in accordance with the approved permit.

**INSPECTION COUNT/ INC COUNT:**

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

## **INITIAL INSTALLATION TEST**

**D-612 DID OPERATOR TEST AT LEAST ONE SET OF RAMS WITH THE ROV ON THE SUBSEA BOP STACK UPON ITS INITIAL INSTALLATION ON THE SEAFLOOR AND ARE TEST RESULTS MADE AVAILABLE TO BSEE UPON REQUEST?**

**Authority: 30 CFR 250.449(j)**

**Enforcement Action: S**

**INSPECTION PROCEDURE:**

1. Verify operator functioned via ROV hot stab and pressure tested to confirm the closure of at least one set of rams on the subsea BOP stack upon its installation on the seafloor in accordance with the test procedures and approved permit.
2. Verify procedures were submitted for District Manager approval.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) if operator did not conduct a test and pressure test to confirm closure on at least one set of rams on the subsea BOP stack upon its initial installation on the sea floor and/ or if procedures to conduct test was not submitted to District Manager for approval prior to testing.

**INSPECTION COUNT/ INC COUNT:**

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

**D-613 DID OPERATOR CONDUCT A TEST OF THE DEADMAN SYSTEM ON THE SUBSEA BOP STACK DURING THE INITIAL TEST ON THE SEAFLOOR AND ARE TEST RESULTS MADE AVAILABLE TO BSEE UPON REQUEST?**

**Authority: 30 CFR 250.449(k)**

**Enforcement Action: S**

**INSPECTION PROCEDURE:**

1. Verify closure of at least one set of blind-shear rams upon testing deadman system and was conducted in accordance with approved permit.
2. Records must be made available during inspection.

**IF NONCOMPLIANCE EXISTS:**

Issue a rig shut-in (S) if operator did not conduct a test on deadman system in accordance with approved permit.

**INSPECTION COUNT/ INC COUNT:**

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