WELL-WORKOVERS
LAST UPDATE 2015

WELL-WORKOVER OPERATIONS

W-100 **HAVE ALL WELLS IN THE SAME WELLBAY WHICH ARE CAPABLE OF PRODUCING HYDROCARBONS BEEN SHUT-IN BELOW THE SURFACE WITH A PUMP-THROUGH TYPE TUBING PLUG OR SCSSV AND AT THE SURFACE WITH A CLOSED MASTER VALVE PRIOR TO MOVING WELL-WORKOVER RIGS AND RELATED EQUIPMENT (OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER)?**

Authority: 30 CFR 250.602 **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Check the facility/operator's records to verify that the wells capable of producing hydrocarbons were shut-in below the surface with a pump-through type tubing plug or SCSSV and at the surface with a closed master valve prior to moving well-workover equipment.

Note: A closed surface-controlled subsurface safety valve of the pump-through type may be used in lieu of the pump-through type tubing plug, provided that the surface control has been locked out of operation.

2. If the inspection is conducted while well-workover equipment is being moved, inspect each well capable of producing hydrocarbons to verify that it is shut-in as described above.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that wells capable of producing hydrocarbons in the same wellbay have not been shut-in below the surface and at the surface.

Issue a facility shut-in (**S**) INC for the moving operation if moving operations are in progress and wells capable of producing hydrocarbons in the same wellbay have not been shut-in below the surface and at the surface.

INSPECTION COUNT/ INC COUNT:

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

W-101 **IS THE WELL TO OR FROM WHICH A WELL-WORKOVER RIG OR RELATED EQUIPMENT TO BE MOVED EQUIPPED WITH A PUMP THROUGH TYPE TUBING PLUG AND A BACK- PRESSURE VALVE PRIOR TO REMOVING THE TREE AND INSTALLING, TESTING OR REMOVING THE BOP SYSTEM?**

Authority: 30 CFR 250.602 **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Check the operator's records to verify that the well to which the well-workover equipment was moved was equipped with a pump through type tubing plug and a back-pressure valve prior to removing the tree and installing, testing or removing the BOP.
2. If moving operations are in progress during the inspection, verify that the pump through type tubing plug and a back-pressure valve are in place.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that a pump through type tubing plug and back-pressure valve was not installed in the well prior to removing the tree and installing, testing or removing the BOP system.

Issue a facility shut-in (**S**) INC for the moving operation if moving operations are in progress and a pump through type tubing plug and back-pressure valve is not installed in the well prior to removing the tree and installing, testing or removing the BOP system.

INSPECTION COUNT/ INC COUNT:

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

W-102 **HAVE THE CREW MEMBERS BEEN INSTRUCTED IN THE SAFETY REQUIREMENTS OF THE OPERATIONS TO BE PERFORMED, POSSIBLE HAZARDS TO BE ENCOUNTERED, AND GENERAL SAFETY CONSIDERATIONS TO PROTECT PERSONNEL, EQUIPMENT, AND THE ENVIRONMENT PRIOR TO ENGAGING IN WELL-WORKOVER OPERATIONS; AND HAVE THE DATE AND TIME OF THE SAFETY MEETINGS BEEN RECORDED?**

Authority: 30 CFR 250.606 **Enforcement Action: W**

INSPECTION PROCEDURE:

Verify that all crew members have received instruction at safety meetings in the following prior to commencing well-workover operations and that the date and time of the meetings have been recorded:

1. Safety requirements of the operation to be performed.
2. Possible hazards to be encountered.
3. General safety considerations to protect: A. Personnel.
   B. Equipment.
   C. Environment.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if:

1. The safety meeting was not held prior to commencing well-workover operations.
2. The time and date of the safety meetings were not recorded.

INSPECTION COUNT/ INC COUNT:

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

W-104 **HAVE ALL UNITS BEING USED FOR WELL-WORKOVER OPERATIONS WHICH HAVE BOTH A TRAVELING BLOCK AND A CROWN BLOCK BEEN EQUIPPED WITH A SAFETY DEVICE WHICH IS DESIGNED TO PREVENT THE TRAVELING BLOCK FROM STRIKING THE CROWN BLOCK?**

Authority: 30 CFR 250.611 **Enforcement Action: S**

DEFINITION:

Traveling block safety device – also referred to as a Crown-o-matic.

INSPECTION PROCEDURE:

1. Visually inspect the workover unit to verify the presence of a traveling block safety device.
2. Visually inspect the position of the toggle above the cable drum to verify the distance for cable shut-down.
3. If workover operations are in progress, verify that the device is in service, and witness the proper operation of the device.

Note: The traveling block safety device is not to be actuation tested when the traveling block is loaded with drill pipe or work string.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the workover unit if:

1. The traveling block safety device is not installed.
2. The toggle is not installed above the cable drum a sufficient distance for cable shut-down.
3. The device does not operate properly.

INSPECTION COUNT/ INC COUNT:

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

W-105 **HAS THE TRAVELING-BLOCK SAFETY DEVICE BEEN CHECKED FOR PROPER OPERATION WEEKLY AND AFTER EACH DRILL-LINE SLIPPING OPERATION, AND HAVE THE RESULTS OF THE OPERATIONAL CHECK BEEN RECORDED IN THE OPERATIONS LOG?**

Authority: 30 CFR 250.611 **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Verify that the traveling-block safety device has been checked for proper operation:
   A. Weekly; and,
   B. After each drill-line slipping operation.
2. Verify that the device has been reset after each drill line slipping operation.
3. Verify that the results of the operational checks have been recorded in the operations log.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if:

1. The safety device has not been checked for proper operation as required.
2. If the results were not recorded in the operations log.

INSPECTION COUNT/ INC COUNT:

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

W-106 **BEFORE DISPLACING KILL-WEIGHT FLUID FROM THE WELLBORE AND/OR RISER TO AN UNBALANCED STATE, DID THE OPERATOR OBTAIN APPROVAL FROM THE DISTRICT MANAGER?**

Authority: 30 CFR 250.614(d) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to verify that:

1. Approval from District Manager included the reasons for displacing kill-weight fluid and had a detailed step by step 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 you will conduct to ensure integrity of independent barriers;
   C. BOP procedures you will use while displacing kill-weight fluids; and,
   D. Procedures you will use to monitor fluids entering and leaving the wellbore.

Note: Records must be made available during inspection.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) if the operator did not receive approval from the District Manager before displacing kill-weight fluid from the wellbore.

INSPECTION COUNT/ INC COUNT:

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

W-107 **HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT MANAGER PRIOR TO CONDUCTING WELL-WORKOVER OPERATIONS?**

Authority: 30 CFR 250.613(a) **Enforcement Action: S**

INSPECTION PROCEDURE:

Request proof of written approval from the operator, as follows:

1. Form MMS 123, Application for Permit to Drill, Deepen, or Plug Back signed by the District Manager, or
2. Form MMS 124, APM/RPM and Reports on Wells, signed by the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the operator does not have written approval for the operation.

INSPECTION COUNT/ INC COUNT:

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

W-108 **IS THE WELL BEING CONTINUOUSLY MONITORED DURING WELL-WORKOVER OPERATIONS AND NOT LEFT UNATTENDED AT ANY TIME UNLESS THE WELL IS SHUT-IN AND SECURED?**

Authority: 30 CFR 250.614(a) **Enforcement Action: W**

DEFINITION:

Continuously monitored - From the time operations are initiated until operations are completed, a member of the crew shall maintain surveillance continuously unless the well is secured with BOP's, bridge plugs, storm packers, cement plugs, or SSSV's.

INSPECTION PROCEDURE:

Verify that the well is continuously monitored during an inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the well is not continuously monitored or not secured as required.

INSPECTION COUNT/ INC COUNT:

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

W-109 **WHEN COMING OUT OF THE HOLE WITH THE WORK STRING, IS THE ANNULUS BEING FILLED WITH WELL-CONTROL FLUID BEFORE THE CHANGE IN SUCH FLUID LEVEL DECREASES THE HYDROSTATIC PRESSURE BY 75 PSI, OR EVERY FIVE STANDS OF WORK STRING, WHICHEVER GIVES A LOWER DECREASE IN HYDROSTATIC PRESSURE?**

Authority: 30 CFR 250.614(b) **Enforcement Action: W**

Note: This PINC applies to well-workover operations with the tree removed.

INSPECTION PROCEDURE:

If tripping operations are in progress, verify that the hole is filled after pulling the posted number of stands.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC when more than the posted number of stands is pulled and the hole is not filled.

INSPECTION COUNT/ INC COUNT:

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

W-110 **HAS THE NUMBER OF STANDS OF DRILL PIPE OR WORK STRING AND DRILL COLLARS THAT MAY BE PULLED PRIOR TO FILLING THE HOLE AND THE EQUIVALENT WELL-CONTROL FLUID VOLUME BEEN CALCULATED AND POSTED NEAR THE DRILLER'S/OPERATOR'S STATION?**

Authority: 30 CFR 250.614(b) **Enforcement Action: W**

Note: This PINC applies to well-workover operations with the tree removed.

INSPECTION PROCEDURE:

Verify that the fill-up volume equivalents for the drill pipe or work string and drill collars in use are posted near the driller's/operator's station.

Note: Fill-up volumes are verifiable only if the hole is being filled during the inspection.

IF NONCOMPLIANCE EXISTS:

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

INSPECTION COUNT/ INC COUNT:

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

W-111 **IS A MECHANICAL, VOLUMETRIC, OR ELECTRONIC DEVICE UTILIZED TO DETERMINE THE AMOUNT OF WELL-CONTROL FLUID REQUIRED TO FILL THE HOLE?**

Authority: 30 CFR 250.614(b) **Enforcement Action: S**
30 CFR 250.614(c)(2)

Note: This PINC applies to well-workover operations with the tree removed.

INSPECTION PROCEDURE:

1. Verify the installation of a well-control fluid volume measuring device.
2. Witness the operation of the well-control fluid volume measuring device if trip operations are in progress during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the well-control fluid volume measuring device is not installed or if it is not operable.

INSPECTION COUNT/ INC COUNT:

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

W-112 **HAS A FILL-UP LINE ABOVE THE UPPERMOST BOP BEEN INSTALLED, MAINTAINED, AND UTILIZED?**

Authority: 30 CFR 250.614(c)(1) **Enforcement Action: S**

Note: This PINC applies to well-workover operations with the tree removed.

INSPECTION PROCEDURE:

Verify that the fill-up line is connected above the uppermost preventer.

Note: Kill lines are not acceptable as fill-up lines.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if an operable fill-up line has not been installed above the uppermost preventer.

INSPECTION COUNT/ INC COUNT:

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

W-113 **HAS A RECORDING MUD-PIT LEVEL INDICATOR WITH BOTH A VISUAL AND AN AUDIBLE WARNING DEVICE BEEN INSTALLED, MAINTAINED, AND UTILIZED?**

Authority: 30 CFR 250.614(c)(3) **Enforcement Action: S**

Note: This PINC applies to well-workover operations with the tree removed.

INSPECTION PROCEDURE:

1. Verify the installation of a recording mud-pit level indicator.
2. Witness the operation of the system, including visual and audible alarms, by actuating the mud-pit level sensors in accordance with Appendix 25.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC when a mud-pit level indicator system is not installed and operable.

INSPECTION COUNT/ INC COUNT:

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

BOP WELL-WORKOVER OPERATIONS

W-114 **DOES THE BOP SYSTEM FOR WELL-WORKOVER OPERATIONS WITH THE TREE REMOVED INCLUDE, AS A MINIMUM, THREE PREVENTERS WHEN THE EXPECTED SURFACE PRESSURE IS LESS THAN 5,000 PSI?**

Authority: 30 CFR 250.616(b)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. For workover operations with the tree removed, where the anticipated surface pressure is less than 5,000 psi, visually inspect the BOP system to verify the installation of the following as a minimum: A. One annular preventer.
   B. One set of pipe rams.
   C. One set of blind-shear rams.
2. For subsea BOP stacks, visually check the control station for the above configuration, or if available, check via the ROV camera.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system is not configured as required.

INSPECTION COUNT/ INC COUNT:

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

W-115 **DOES THE BOP SYSTEM FOR WELL-WORKOVER OPERATIONS WITH THE TREE REMOVED INCLUDE, AS A MINIMUM, FOUR PREVENTERS WHEN THE EXPECTED SURFACE PRESSURE IS 5,000 PSI OR GREATER OR YOU USE MULTIPLE TUBING STRINGS?**

Authority: 30 CFR 250.616(b)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. For workover operations with the tree removed, where the anticipated surface pressure is equal to or greater than 5000 psi or multiple tubing strings are used, visually inspect the BOP system to verify the installation of the following as a minimum:
   A. One annular preventer. B. Two sets of
   pipe rams.
   C. One set of blind-shear rams.
2. For subsea BOP stacks, visually check the control station for the above configuration or, if available, check via the ROV camera.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system is not configured as required.

INSPECTION COUNT/ INC COUNT:

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

W-116 **DOES THE BOP SYSTEM FOR WELL-WORKOVER OPERATIONS WITH THE TREE REMOVED INCLUDE, AS A MINIMUM, DUAL PIPE RAM BLOCKS INSTALLED ON ONE OF THE PIPE RAM PREVENTERS WHEN DUAL TUBING STRINGS ARE BEING HANDLED SIMULTANEOUSLY?**

Authority: 30 CFR 250.616(b)(3) **Enforcement Action: S**

INSPECTION PROCEDURE:

For workover operations with the tree removed, when dual tubing strings are being handled simultaneously, verify that dual pipe ram blocks are installed in one of the pipe ram preventers.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if dual pipe rams are not installed in one of the pipe ram preventers when dual tubing strings are being handled simultaneously.

INSPECTION COUNT/ INC COUNT:

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

W-117 **WHEN A TAPERED DRILL STRING IS USED, DOES THE BOP SYSTEM INCLUDE, AS A MINIMUM, FOUR PREVENTERS WHEN THE EXPECTED SURFACE PRESSURE IS LESS THAN 5,000 PSI?**

Authority: 30 CFR 250.616(b)(4) **Enforcement Action: S**

Note: This PINC applies to well-workover operations with the tree removed.

INSPECTION PROCEDURE:

For workover operations using tapered drill string where the anticipated surface pressure is less than 5,000 psi, visually inspect the BOP system to verify the installation of at least four preventers as follows:

1. One annular preventer.
2. Two sets of pipe rams, one set capable of sealing around the larger size drill string and one set capable of sealing around the smaller size drill string.

Note: One set of variable bore rams may be substituted for the two sets of pipe rams.

3. One set of blind-shear rams

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system is not configured as described above.

INSPECTION COUNT/ INC COUNT:

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

W-118 **WHEN A TAPERED DRILL STRING IS USED, DOES THE BOP SYSTEM INCLUDE, AS A MINIMUM, FIVE PREVENTERS WHEN THE EXPECTED SURFACE PRESSURE IS 5,000 PSI OR GREATER?**

Authority: 30 CFR 250.616(b)(4) **Enforcement Action: S**

Note: This PINC applies to well-workover operations with the tree removed.

INSPECTION PROCEDURE:

For workover operations using tapered drill string where the anticipated surface pressure is equal to or greater than 5,000 psi, visually inspect the BOP system to verify the installation of at least five preventers as follows:

1. One annular preventer.
2. Two sets of pipe rams capable of sealing around the larger size drill string.
3. One set of pipe rams capable of sealing around the smaller size drill string.
4. One set of blind-shear rams.

Note: One set of variable bore pipe rams may be substituted for one set of pipe rams for the larger size drill string and one set of pipe rams for the smaller size drill string.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system is not configured as described above.

INSPECTION COUNT/ INC COUNT:

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

W-119 **WHEN THE TREE IS REMOVED AND A BOP SYSTEM IS INSTALLED, DOES THE ACCUMULATOR SYSTEM PROVIDE SUFFICIENT CAPACITY TO SUPPLY 1.5 TIMES THE VOLUME OF FLUID NECESSARY TO CLOSE AND HOLD CLOSED ALL BOP EQUIPMENT UNITS WITH A MINIMUM PRESSURE OF 200 PSI ABOVE THE PRE-CHARGE PRESSURE, WITHOUT ASSISTANCE FROM A CHARGING SYSTEM?**

Authority: 30 CFR 250.616(c)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Verify that the BOP actuating system which is installed is in compliance with that which has been approved.
2. Verify that the complete system is free of leaks and that all components are in service (not bypassed).
3. Witness automatic operation of the charging system.

Note: Refer to Appendix 23 for typical surface stack accumulator size calculations.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the hydraulic BOP actuating system does not provide sufficient capacity to supply 1.5 times the volume necessary to close all BOP components with a minimum pressure of 200 psi above the pre-charge pressure without assistance from a charging system.

INSPECTION COUNT/ INC COUNT:

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

W-120 **DOES THE BOP SYSTEM FOR WELL-WORKOVER WITH THE TREE REMOVED CONTAIN A SECONDARY POWER SOURCE, INDEPENDENT FROM THE PRIMARY POWER SOURCE, WITH SUFFICIENT CAPACITY TO CLOSE ALL BOP SYSTEM COMPONENTS AND HOLD THEM CLOSED?**

Authority: 30 CFR 250.616(c)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Verify that the backup power source is independent from the primary power source.
2. Witness operation of the accumulator backup system and verify that the backup system automatically charges the accumulators sufficiently to close and hold closed all BOP system components.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (**S**) INC if:

1. The backup power system is not independent from the primary power source.
2. The accumulator backup does not automatically charge the accumulator system sufficiently to close and hold closed all system components.

INSPECTION COUNT/ INC COUNT:

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

W-121 **DOES THE BOP SYSTEM FOR WELL-WORKOVER WITH THE TREE REMOVED CONTAIN LOCKING DEVICES FOR THE PIPE-RAM PREVENTERS?**

Authority: 30 CFR 250.616(c)(3) **Enforcement Action: S**

DEFINITION:

Locking devices - Surface BOP systems shall have dogs provided on the ram-type preventers.
Subsea BOP systems shall have ram lock-out indicator lights or other indication methods as approved.

INSPECTION PROCEDURE:

1. Visually inspect surface BOP systems and subsea BOP panels to verify that locking devices have been provided on ram-type preventers.
2. If conditions permit, witness operation of locking devices.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if operable locking devices are not provided.

INSPECTION COUNT/ INC COUNT:

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

W-122 **DOES THE BOP SYSTEM FOR WELL-WORKOVER WITH THE TREE REMOVED CONTAIN AT LEAST ONE REMOTE BOP CONTROL STATION AND ONE BOP CONTROL STATION ON THE RIG FLOOR?**

Authority: 30 CFR 250.616(c)(4) **Enforcement Action: S**

DEFINITION:

Remote BOP control station - A control panel located such that the operation of each preventer and control valve can be controlled from a readily accessible point at a safe distance from the rig floor.

INSPECTION PROCEDURE:

1. Verify that a readily accessible remote BOP control station exists on the facility.
2. Verify that a BOP control station exists on the rig floor.
3. Witness the operation of both control stations, or inspect the control panel gauge for presence of operating control pressure.

IF NONCOMPLIANCE EXISTS:

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

1. An operable remote BOP control station is not installed.
2. An operable BOP control station is not installed on the rig floor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each control station inspected.

W-123 **DOES THE BOP SYSTEM FOR WELL-WORKOVER WITH THE TREE REMOVED CONTAIN A CHOKE LINE AND A KILL LINE EACH EQUIPPED WITH TWO FULL OPENING VALVES AND A CHOKE MANIFOLD?**

Authority: 30 CFR 250.616(c)(5) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Visually verify that each choke and kill line is equipped with two full-opening valves and a choke manifold.
2. Conditions permitting, witness the operation of the valves.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (**S**) INC if:

1. The choke and kill lines are not equipped with two operable full opening valves.
2. There is no choke manifold.

INSPECTION COUNT/ INC COUNT:

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

W-124 **DOES THE BOP SYSTEM FOR WELL-WORKOVER WITH THE TREE REMOVED CONTAIN AT LEAST ONE REMOTELY-CONTROLLED VALVE EACH ON THE CHOKE LINE AND ON THE KILL LINE?**

Authority: 30 CFR 250.616(c)(5) **Enforcement Action: S**

INSPECTION PROCEDURE:

Visually inspect the choke and kill lines to determine if they are each equipped with at least one remotely-controlled valve.

Note: 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 component shut-in (**S**) INC if:

1. The choke line is not equipped with at least one remotely-controlled valve.
2. The kill line is not equipped with at least one remotely-controlled valve or the approved substitute as per 616 (c)(5).

INSPECTION COUNT/ INC COUNT:

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

W-125 **DO THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE KILL-LINE INLET INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.616(f)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP system includes, one kill-line inlet installed between the hydraulically-operated shear rams and the hydraulically-operated two-way slip rams.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system does not contain one kill-line inlet installed in the proper sequence.

INSPECTION COUNT/ INC COUNT:

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

W-126 **IS THE PRESSURE RATING OF THE CHOKE AND KILL LINES AND ASSOCIATED EQUIPMENT AT LEAST EQUIVALENT TO THE PRESSURE RATING OF THE RAM PREVENTERS?**

Authority: 30 CFR 250.616(c)(5) **Enforcement Action: S**

Note: This PINC applies to well-workover operations with the tree removed.

INSPECTION PROCEDURE:

Visually verify that all equipment has a rated working pressure at least equal to the rated working pressure of the ram preventers by examining the rating tags or component documentation such as certification documents.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if any equipment does not have a rated working pressure at least equal to the rated working pressure of the ram type preventers.

INSPECTION COUNT/ INC COUNT:

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

W-127 **DO THE MINIMUM BOP-SYSTEM COMPONENTS WITH THE TREE IN PLACE AND PERFORMED THROUGH THE WELLHEAD INSIDE CONVENTIONAL TUBING USING SMALL-DIAMETER JOINTED PIPE AS A WORK STRING INCLUDE TWO SETS OF PIPE RAMS AND ONE SET OF BLIND RAMS?**

Authority: 30 CFR 250.616(d) **Enforcement Action: S**

INSPECTION PROCEDURE:

If a small diameter jointed pipe is being used as a work string inside conventional tubing with the tree in place, verify that the BOP system contains, as a minimum:

1. Two sets of pipe rams.
2. One set of blind rams.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system is not configured as required.

INSPECTION COUNT/ INC COUNT:

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

W-128 **DO THE MINIMUM BOP-SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED-TUBING OPERATIONS INCLUDE ONE SET OF HYDRAULICALLY-OPERATED PIPE RAMS INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.616(f)(1) **Enforcement Action: S**
30 CFR 250.616(f)(3)

Note: A set of hydraulically-operated combination rams may be used for the hyrdraulically-operated pipe rams.

INSPECTION PROCEDURE:
If coiled tubing operations are in progress, with the tree in place, verify that the BOP system includes, as a minimum, one set of hydraulically-operated pipe rams.

IF NONCOMPLIANCE EXISTS:
Issue a facility shut-in (**S**) INC if the BOP system does not contain at least one set of pipe rams which are hydraulically operated or an approved substitute.

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

W-129 **DO THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE TWO-WAY HYDRAULICALLY-OPERATED SLIP RAM INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.616(f)(1) **Enforcement Action: S**
30 CFR 250.616(f)(3)

Note: A set of hydraulically-operated combination rams may be used for the hyrdraulically-operated slip rams.

INSPECTION PROCEDURE:
If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP system includes, as a minimum, one two-way slip assembly that is hydraulically operated or an approved substitute.

IF NONCOMPLIANCE EXISTS:
Issue a facility shut-in (**S**) INC if the BOP system does not contain at least one two-way slip ram that is hydraulically operated.

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

W-130 **DO THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE HYDRAULICALLY-OPERATED SHEAR RAM INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.616(f)(1) **Enforcement Action: S**
30 CFR 250.616(f)(2)

Note: A set of hydraulically-operated combination rams may be used for the hyrdraulically-operated shear rams.

INSPECTION PROCEDURE:
If coiled tubing operations are in progress with the tree in place, verify that the BOP system includes, as a minimum, one shear ram that is hydraulically operated.

IF NONCOMPLIANCE EXISTS:
Issue a facility shut-in (**S**) INC if the BOP system does not contain at least one shear ram that is hydraulically operated or an approved substitute

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

W-131 **DO THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE HYDRAULICALLY OPERATED BLIND RAM INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.616(f)(1) **Enforcement Action: S**
30 CFR 250.616(f)(2)

Note: A set of hydraulically-operated combination rams may be used for the hyrdraulically-operated blind rams.

INSPECTION PROCEDURE:
If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP system includes, as a minimum, one set of blind rams that are hydraulically operated or an approved substitute.

IF NONCOMPLIANCE EXISTS:
Issue a facility shut-in (**S**) INC if the BOP system does not contain at least one set of blind rams that are hydraulically operated.

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

W-132 **DO THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE ONE PIPE-STRIPPER ASSEMBLY INSTALLED IN THE PROPER SEQUENCE?**

Authority: 30 CFR 250.616(f)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

If coiled tubing operations are in progress with the tree in place, visually inspect to verify that the BOP system includes, as a minimum, one pipe-stripper assembly.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system does not contain at least one pipe- stripper assembly.

INSPECTION COUNT/ INC COUNT:

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

W-133 **DOES THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY COILED TUBING OPERATIONS INCLUDE, A DUAL CHECK VALVE ASSEMBLY, CHOKE AND KILL VALVES WITH EQUAL OR GREATER WORKING PRESSURE THEN THE CONNECTION TO WHICH THEY ARE ATTCAHED AND ARE ALL CONNECTIONS FLANGED.**

Authority: 30 CFR 250.616(f)(4) **Enforcement Action: S**
30 CFR 250.616(f)(5)
30 CFR 250.616(f)(7)

INSPECTION PROCEDURE:

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

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system does not meet the above requirements.

INSPECTION COUNT/ INC COUNT:

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

W-134 **DO THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY SNUBBING OPERATIONS INCLUDE ONE SET OF PIPE RAMS HYDRAULICALLY OPERATED?**

Authority: 30 CFR 250.616(g)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

If snubbing operations are in progress with the tree in place, visually inspect to verify that the BOP system includes, as a minimum, one set of pipe rams that are hydraulically operated.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system does not contain at least one set of pipe rams that are hydraulically operated.

INSPECTION COUNT/ INC COUNT:

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

W-135 **DO THE MINIMUM BOP SYSTEM COMPONENTS FOR WELL-WORKOVER OPERATIONS WITH THE TREE IN PLACE AND PERFORMED BY SNUBBING OPERATIONS INCLUDE TWO SETS OF STRIPPER-TYPE PIPE RAMS HYDRAULICALLY OPERATED WITH SPACER SPOOL?**

Authority: 30 CFR 250.616(g)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

If snubbing operations are in progress with the tree in place, visually inspect to verify that the BOP system includes, as a minimum, two sets of stripper-type pipe rams that are hydraulically operated and a spacer spool.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP system does not contain:

1. At least two sets of stripper-type pipe rams that are hydraulically operated.
2. A spacer spool.

INSPECTION COUNT/ INC COUNT:

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

W-136 **IS AN INSIDE BOP OR SPRING-LOADED BACK-PRESSURE SAFETY VALVE, AND AN ESSENTIALLY FULL-OPENING WORK-STRING SAFETY VALVE, IN THE OPEN POSITION, BEING MAINTAINED ON THE RIG FLOOR AT ALL TIMES DURING WELL-WORKOVER OPERATIONS WHEN THE TREE IS REMOVED OR DURING WELL-WORKOVER OPERATIONS WITH THE TREE INSTALLED AND USING SMALL TUBING AS THE WORK STRING?**

Authority: 30 CFR 250.616(h) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Verify that the inside BOP and work-string safety valves fitting all sizes of pipe in the work-string are available on the rig floor and are operable.
2. Verify that the inside BOP and work-string safety valves have a rated working pressure equal to or greater than the rated working pressure of the BOP stack in use.
3. Visually confirm that the inside BOP and work-string safety valves are in the open position.

Note: The full-opening work-string safety valve is not required for coiled tubing or snubbing operations.

IF NONCOMPLIANCE EXISTS:

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

1. The required inside BOP and work-string safety valve are not available on the rig floor, or
2. The valves are not maintained in the open position, or
3. The valves do not have a rated working pressure equal to or greater than the rated working pressure of the BOP stack in use.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per each valve inspected.

W-137 **IS A WRENCH FITTING THE WORK-STRING SAFETY VALVES READILY AVAILABLE?**

Authority: 30 CFR 250.616(h) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that wrenches to fit each valve in use are available in the rig floor area.

Note: This requirement pertains to well-workover operations with the tree removed or during operations with the tree installed and using small tubing as the work string. The wrench is not required for coiled tubing or snubbing operations.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the wrenches are not readily available.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per each valve inspected.

W-138 **ARE CONNECTIONS READILY AVAILABLE FOR INSERTING VALVES IN THE WORK STRING?**

Authority: 30 CFR 250.616(h) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that connections are readily available for inserting valves in the work string.

Note: This requirement pertains to well-workover operations with the tree removed or during operations with the tree installed and using small tubing as the work string. The wrench is not required for coiled-tubing or snubbing operations.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if connections are not readily available for inserting valves in the work string.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per each valve inspected.

W-139 **PRIOR TO CONDUCTING HIGH-PRESSURE TESTS, ARE ALL BOP SYSTEMS TESTED TO A LOW PRESSURE OF 200 TO 300 PSI?**

Authority: 30 CFR 250.617(a) (1) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Verify that a low-pressure test on BOP equipment was conducted prior to a high-pressure test.
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 missed, but subsequently performed.

Issue a facility shut-in (**S**) INC for workover operations on a production platform or a MODU when records indicate a low-pressure test was not performed prior to a high-pressure test.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-140 **WHEN CONDUCTING HIGH PRESSURE TESTS, HAVE RAM-TYPE BOP'S, RELATED CONTROL EQUIPMENT, INCLUDING THE CHOKE AND KILL MANIFOLDS, AND SAFETY VALVES BEEN SUCCESSFULLY TESTED TO THE RATED WORKING PRESSURE OF THE BOP EQUIPMENT (OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER)?**

Authority: 30 CFR 250.617(a)(2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that pressure tests have been performed on rams and related equipment.
2. Verify that tests have been performed to the rated working pressure of the BOP equipment or as otherwise approved by the District Manager.
3. Witness tests if performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the rams and related control equipment have been tested, to less than minimum requirements, but were later met by a subsequent test.

Issue a facility shut-in (**S**) INC if the rams and related control equipment has not been tested as required.

INSPECTION COUNT/ INC COUNT:

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

W-141 **HAVE VARIABLE BORE RAMS BEEN PRESSURE TESTED AGAINST THE LARGEST AND THE SMALLEST SIZES OF PIPE IN THE WELL, EXCLUDING DRILL COLLARS?**

Authority: 30 CFR 250.617(a)(3) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that tests have been conducted.
2. Witness the test if it is performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that the variable bore pipe rams were not pressure tested against the largest and smallest sizes of tubulars in use (jointed pipe, seamless pipe) in the well.

Issue a facility shut-in (**S**) INC if the tests have not been conducted as required.

INSPECTION COUNT/ INC COUNT:

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

W-142 **HAVE SURFACE BOP SYSTEMS BEEN PRESSURE TESTED WITH WATER?**

Authority: 30 CFR 250.617(a)(3) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that pressure tests on surface BOP systems were conducted with water.
2. Witness the test if it is conducted during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that the surface BOP system was not pressure tested with water in the past, but a subsequent test was conducted with water.

Issue a facility shut-in (**S**) INC if the surface BOP system has not been tested with water.

INSPECTION COUNT/ INC COUNT:

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

W-143 **HAS THE ANNULAR-TYPE BOP BEEN SUCCESSFULLY TESTED AT 70 PERCENT OF ITS RATED WORKING PRESSURE (OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER)?**

Authority: 30 CFR 250.617(a)(2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Determine the rated working pressure of the annular-type BOP by visually inspecting the body of the preventer for a rating stamping or tag or certification documentation for the annular.
2. Inspect the operator's log to verify that the annular-type preventers were pressure tested to 70 percent of the rated working pressure, or as otherwise approved by the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that pressure test was not performed to 70 percent of the rated working pressure of the annular-type preventer, but a subsequent test was performed to 70 percent of the rated working pressure.

Issue a facility shut-in (**S**) INC if the annular-type preventer was not tested to 70 percent of the rated working pressure.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-144 **FOR COILED TUBING OPERATIONS WITH THE PRODUCTION TREE IN PLACE, DOES THE HYDRAULIC-ACTUATING SYSTEM PROVIDE SUFFICIENT ACCUMULATOR CAPACITY TO CLOSE-OPEN-CLOSE EACH COMPONENT IN THE BOP STACK WITH AT LEAST 200 PSI ABOVE THE PRECHARGE PRESSURE WITHOUT ASSISTANCE FROM A CHARGING SYSTEM?**

AUTHORITY: 30 CFR 250.616(f)(6) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. Verify that the coiled tubing BOP actuating system which is installed with tree in place is in compliance with that which has been approved.
2. Verify that the complete system is free of leaks and that all components are in service (not bypassed).
3. Witness operation of the system.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC if the BOP accumulator system does not have sufficient capacity to close-open-close all components in the BOP stack with at least 200 psi above the precharge system pressure without assistance from a charging system.

INSPECTION COUNT/ INC COUNT:

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

W-145 **HAVE THE BOP SYSTEMS BEEN TESTED WHEN INSTALLED?**

Authority: 30 CFR 250.617(b)(1) **Enforcement Action: W/S**
30 CFR 250.617(h)

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that tests were performed when the BOP system was initially installed.
2. Witness the tests if they are being performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if operations have commenced without the initial tests, but subsequent tests have been performed.

Issue a facility shut-in (**S**) INC if installation has been accomplished and no tests have been performed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-146 **HAVE THE BOP SYSTEMS BEEN TESTED AT LEAST ONCE EVERY 7 DAYS?**

Authority: 30 CFR 250.617(b) (2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

Inspect operator's log to verify that tests were performed at least every 7 days.

Note:

1. More than 7 days is allowed when well operations prevent testing due to problems such as:
   A. Stuck pipe.
   B. Pressure control operations. C. Remedial well efforts.
2. The tests shall be conducted as soon as possible after the problem is solved, but before normal operations resume.
3. The reason for postponing testing shall be entered into the operations log.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that tests other than most recent test exceeded the 7day requirement without acceptable explanation in the operator's log.

Issue a facility shut-in (**S**) INC if the date of most recent test exceeds the 7 day requirement and acceptable explanation is not entered in the operator's log.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-147 **HAVE THE BLIND SHEAR RAMS BEEN TESTED AT LEAST ONCE EVERY 30 DAYS DURING NORMAL OPERATIONS?**

Authority: 30 CFR 250.617(b)(2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that the blind-shear rams have been tested at least once every 30 days.
2. If inspection is being performed during testing of the blind-shear rams, witness the test.

Note:

1. A longer period between blowout preventer tests is allowed when there is a stuck pipe or pressure control operation and remedial efforts are being performed. The tests shall be conducted as soon as possible and before normal operations resume.
2. The reason for postponing testing shall be entered into the operations log.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that tests other than most recent test exceeded the 30-day requirement.

Issue a facility shut-in (**S**) INC if a test has not been conducted in the last 30 days.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-148 **HAS THE AFFECTED BOP SEAL BEEN TESTED FOLLOWING REPAIRS THAT REQUIRE DISCONNECTING A PRESSURE SEAL IN THE ASSEMBLY?**

Authority: 30 CFR 250.617(b)(3) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

Inspect operator's log to verify that, where repairs required disconnection of pressure seal, tests on affected was conducted.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that operations commenced without tests being conducted on the seal, but subsequent BOP tests were conducted.

Issue a facility shut-in (**S**) INC if no tests were conducted on the seal following repairs.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-149 **DO THE TESTS ALTERNATE BETWEEN CONTROL STATIONS AND AT STAGGERED INTERVALS TO ALLOW EACH CREW TO OPERATE THE EQUIPMENT?**

Authority: 30 CFR 250.617(b)(2) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that each crew has been allowed to operate the equipment during tests.
2. Verify that all control stations are functional.
3. Conditions permitting, witness operation of the BOP equipment by the crew on tour.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate that each crew has not operated the BOP equipment during tests. Issue a facility shut-in (**S**) INC if either control station is found to be inoperable.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-150 **ARE ALL PERSONNEL ENGAGED IN WELL-WORKOVER OPERATIONS PARTICIPATING IN A WEEKLY BOP DRILL TO FAMILIARIZE CREW MEMBERS WITH APPROPRIATE SAFETY MEASURES?**

Authority: 30 CFR 250.617(c) **Enforcement Action: W**

INSPECTION PROCEDURE:

Inspect operator's log to verify that all personnel are participating in weekly well-control drills and that they have been recorded.

Note: The operator may be instructed to conduct a BOP drill at any time during the inspection while operations are in progress after consulting with the company representative.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if weekly BOP drills have not been conducted or recorded.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-151 **ARE THE TIME, DATE, AND RESULTS OF ALL PRESSURE TESTS, ACTUATIONS, INSPECTIONS, AND CREW DRILLS OF THE BOP SYSTEM, SYSTEM COMPONENTS, AND MARINE RISERS RECORDED IN THE OPERATIONS LOG OR REFERENCED DOCUMENT?**

Authority: 30 CFR 250.617(g) **Enforcement Action: W**
30 CFR 250.617(g)(4)

INSPECTION PROCEDURE:

1. Check the operations log to verify that the time, date, and results of all pressure tests, actuations, inspections, and crew drills of BOP systems, system components, and marine risers are recorded.
2. As an alternative, the documentation required to be entered in the operations log may be referenced there. If the time, date, and results of the pressure tests, actuations, inspections, and crew drills of BOP systems, system components, and marine risers are referenced in the operations log, check the referenced document to verify that the documentation is there.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the time, date and results of all pressure tests, actuations, inspections, and crew drills of the BOP systems, system components, and marine risers are not entered in the operations log or referenced document.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-152 **HAS THE CASING BEEN PRESSURE-TESTED, CALIPERED, OR OTHERWISE EVALUATED EVERY 30 DAYS DURING PROLONGED OPERATIONS AND HAVE THE RESULTS BEEN SUBMITTED TO THE DISTRICT MANAGER?**

Authority: 30 CFR 250.619(b) **Enforcement Action: W/S**

Note: This PINC applies to prolonged operations that could damage the casing such as milling, fishing, jarring, or washing over.

INSPECTION PROCEDURE:

1. Inspect the operator's log to determine if prolonged operations that could damage the casing have been conducted.
2. If such prolonged operations have been conducted, verify that the casing has been pressure tested, calipered, or otherwise evaluated every 30 days and the results have been submitted to the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the operator's log indicated that a subsequent successful casing pressure test was performed beyond the 30 day limit.

Issue a rig shut-in (**S**) INC if the operator's log indicates that the casing has not been evaluated every 30 days during prolonged operations that could damage the casing and operations have been ongoing in the casing string or the results have not been submitted to the District Manager.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-153 **DID THE OPERATOR PROVIDE THE APPROPRIATE DISTRICT MANAGER THE REQUIRED 72 HOUR NOTICE TO ALLOW FOR THE WITNESSING AND/OR TESTING AND INSPECTION OF SUBSEA BOP SYSTEMS, TO INCLUDE STUMP TESTS OR INITIAL SEAFLOOR TESTS PRIOR TO THE CONCLUSION OF ANY WELL-WORKOVER ACTIVITES?**

Authority: 30 CFR 250.617(h)(1)(ii) **Enforcement Action: S**
30 CFR 250.617(h)(1)(iii)

Check records to verify that the operator notified the appropriate 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 the appropriate 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.

W-154 **ARE ACCUMULATOR REGULATORS SUPPLIED BY RIG AIR, AND WITHOUT A SECONDARY SOURCE OF PNEUMATIC SUPPLY, EQUIPPED WITH MANUAL OVERRIDES, OR ALTERNATELY, ARE OTHER DEVICES PROVIDED TO ENSURE CAPABILITY OF HYDRAULIC OPERATIONS IF RIG AIR IS LOST?**

Authority: 30 CFR 250.616(c)(1) **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 facility 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 for each regulator inspected.

W-155 **ARE BOP TEST PRESSURES RECORDED ON A PRESSURE CHART OR WITH A DIGITAL RECORDER, UNLESS OTHERWISE APPROVED BY THE DISTRICT MANAGER?**

Authority: 30 CFR 250.617(f) **Enforcement Action: W**

INSPECTION PROCEDURE:

1. Verify that the BOP test pressures have been recorded on a pressure chart or a digital recorder by requesting to view the actual chart or digital recorder documentation.
2. Prior to inspection, check office records to determine if the District Manager has approved an alternate method of recording BOP test pressure.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the BOP test pressures have not been recorded on a pressure chart or alternative method approved by the District Manager.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-156 **IS THE TEST INTERVAL FOR EACH BOP COMPONENT TESTED SUFFICIENT TO DEMONSTRATE THAT THE COMPONENT IS EFFECTIVELY HOLDING PRESSURE?**

Authority: 30 CFR 250.617(e) **Enforcement Action: W/S**
30 CFR 250.617(f)

INSPECTION PROCEDURE:
Verify that each BOP component held pressure for at least five minutes or other time period approved by the District Manager by checking the pressure charts or alternative documentation as approved by the District Manager.
Note: Ten minute high pressure tests required for coiled tubing string only.

IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if the pressure charts or other documentation indicates that each BOP component did not hold pressure for at least the required time period approved by the District Manager, but a subsequent successful test was completed.
Issue a rig shut-in (**S**) INC if no successful tests were completed.

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

W-157 **ARE BOP TEST PRESSURE CHARTS OR DIGITAL RECORDER CERTIFIED AS CORRECT BY THE OPERATOR'S REPRESENTATIVE AT THE FACILITY?**

Authority: 30 CFR 250.617(f) **Enforcement Action: W**

INSPECTION PROCEDURE:
Verify that each pressure chart or digital recorder contains a written certification (signature and date) by the operator's representative at the facility.

IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if any pressure chart or digital recorder does not contain a written certification by the operator's representative at the facility.

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

W-158 **DOES THE DOCUMENTATION INDICATE THE SEQUENTIAL ORDER OF BOP AND AUXILIARY EQUIPMENT TESTING AND THE PRESSURE AND DURATION OF EACH TEST?**

Authority: 30 CFR 250.617(g)(1) **Enforcement Action: W**
30 CFR 250.617(g)(4)

INSPECTION PROCEDURE:
Check the operations log or referenced document to verify that the sequential order of BOP and auxiliary equipment testing, and the pressure and duration of each, test 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 and the pressure and duration of each test.

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

W-159 **IS THE CONTROL STATION USED DURING THE TEST IDENTIFIED IN THE OPERATIONS LOG OR REFERENCED DOCUMENTS?**

Authority: 30 CFR 250.617(g)(2) **Enforcement Action: W**
30 CFR 250.617(g)(4)

INSPECTION PROCEDURE:
Check the operations log or referenced document to verify that the control station used during the test is identified.

IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if the control station used during the test is not identified in the operations log or referenced document.

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

W-160 **FOR SUBSEA SYSTEMS, IS THE POD USED DURING THE TEST IDENTIFIED IN THE OPERATIONS LOG OR REFERENCED DOCUMENTS?**

Authority: 30 CFR 250.617(g)(2) **Enforcement Action: W**
30 CFR 250.617(g)(4)

INSPECTION PROCEDURE:
Check the operations log or referenced documents to verify that the pod used during the test is identified.

IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if the pod used during the test is not identified in the operations log or referenced documents.

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

W-161 **ARE ANY PROBLEMS OR IRREGULARITIES OBSERVED DURING BOP AND AUXILIARY EQUIPMENT TESTING AND ANY ACTIONS TAKEN TO REMEDY SUCH PROBLEMS OR IRREGULARITIES RECORDED IN THE OPERATIONS LOG OR REFERENCED DOCUMENTS?**

Authority: 30 CFR 250.617(g)(3) **Enforcement Action: W**
30 CFR 250.617(g)(4)

INSPECTION PROCEDURE:
Check the operations log or referenced document to verify that problems or irregularities observed during BOP and auxiliary equipment 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 and auxiliary equipment and actions taken to remedy such problems or irregularities are not recorded in the operations log or referenced documents.

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

W-162 **ARE ALL RECORDS INCLUDING PRESSURE CHARTS, OPERATIONS LOGS, AND REFERENCED DOCUMENTS OF BOP TESTS, ACTUATIONS, AND INSPECTIONS AVAILABLE AT THE FACILITY FOR THE DURATION OF THE WELL-WORKOVER ACTIVITY?**

Authority: 30 CFR 250.617(g)(4) **Enforcement Action: W**

INSPECTION PROCEDURE:
Verify that all records including pressure charts, operations logs, and referenced documents of BOP tests, actuations, and inspections are available at the facility for the duration of the well-workover activity by asking the operator's representative to see them.

IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if all records of BOP tests, actuations, and inspections including pressure charts, operations logs, and referenced documents are not available at the facility for the duration of the well-workover activity.

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

W-163 **ARE ALL SUCH RECORDS RETAINED FOR A PERIOD OF TWO YEARS AT THE FACILITY, AT THE LESSEE'S FIELD OFFICE NEAREST THE FACILITY, OR AT ANOTHER LOCATION CONVENIENTLY AVAILABLE TO THE DISTRICT MANAGER?**

Authority: 30 CFR 250.617(g)(4) **Enforcement Action: W**

INSPECTION PROCEDURE:
Verify that all such records are available by asking the operator's representative for them.

IF NONCOMPLIANCE EXISTS:
Issue a warning (**W**) INC if the records are not conveniently available.

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

WIRELINE OPERATIONS

W-170 **ARE WIRELINE OPERATIONS CONDUCTED SO AS TO MINIMIZE THE LEAKAGE OF WELL FLUIDS?**

Authority: 30 CFR 250.620(a) **Enforcement Action: S**

INSPECTION PROCEDURE:
Visually inspect the wireline operation for fluid leakage.

IF NONCOMPLIANCE EXISTS:
Issue a facility shut-in (**S**) INC for wireline operations if fluids are leaking from the wireline equipment.

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

W-171 **FOR WIRELINE PERFORATING OPERATIONS AND ALL OTHER WIRELINE OPERATIONS WHERE COMMUNICATION EXISTS BETWEEN THE COMPLETED HYDROCARBON- BEARING ZONE(S) AND THE WELLBORE, IS A LUBRICATOR ASSEMBLY CONTAINING AT LEAST ONE WIRELINE VALVE UTILIZED?**

Authority: 30 CFR 250.620(b) **Enforcement Action: S**

INSPECTION PROCEDURE:
For wireline perforating operations and all other wireline operations where communication exists between the completed hydrocarbon-bearing zones and the wellbore, visually inspect the wellhead assembly to verify that a lubricator assembly containing at least one wireline valve is installed.

IF NONCOMPLIANCE EXISTS:
Issue a facility shut-in (**S**) INC for wireline operations if a lubricator assembly containing at least one wireline valve is not installed.

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

W-172 **WHEN A LUBRICATOR IS INITIALLY INSTALLED ON A WELL, IS IT PRESSURE TESTED TO THE EXPECTED SHUT-IN PRESSURE?**

Authority: 30 CFR 250.620(c) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

1. Check the operator's records to:
   A. Confirm the expected shut-in pressure with the last viable test.
   B. Verify that the lubricator was pressure tested to the expected shut-in pressure when it was initially installed.
2. If lubricator is being initially installed during the inspection, witness the pressure test.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if the lubricator was not tested when initially installed, but subsequent tests have been performed. Issue a facility shut-in (**S**) INC for the wireline operation if the lubricator has never been pressure tested to the expected shut-in pressure.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

ESD SYSTEM

W-180 **IS AN OPERABLE ESD STATION INSTALLED NEAR THE DRILLER'S CONSOLE OR WELL-SERVICING UNIT OPERATOR'S WORK STATION, EXCEPT WHEN THERE IS NO OTHER HYDROCARBON-PRODUCING WELL OR FLOW ON THE PLATFORM?**

Authority: 30 CFR 250.603 **Enforcement Action: S**

Note: The offshore operator and contractor should be advised that the ESD station should be tested when installed and subsequent to each rig skid. 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 or well-servicing unit operator's work station during well-workover operations.
2. Verify operation of the ESD station by testing in accordance with Appendix 10.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (**S**) INC for the well-workover 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 per inspection.

BOP TEST/ACUATION/INSPECTION AND MAINTENANCE

W-190 **DOES THE SUBSEA BOP SYSTEM FOR WELL WORKOVER OPERATIONS INCLUDE AT LEAST FOUR REMOTE –CONTROLLED HYDRAULICALLY OPERATED BOPS?**

Authority: 30 CFR 250.616(b)(5) **Enforcement Action: S**
30 CFR 250.442(a)

INSPECTION PROCEDURE:

1. Check records to verify that operator has:
   A. One annular BOP.
   B. Two BOP's equipped with pipe rams.
   C. One BOP equipped with blind shear rams.

Note: The blind shear rams must be capable of shearing any drill pipe in the hole under maximum anticipated surface pressure.

2. For subsea BOP stacks, visually check the control station for the above configurations or if available check via ROV camera.

IF NONCOMPLIANCE EXISTS:

Issue rig shut-in (**S**) INC when the operator cannot verify that the BOP system is not configured as required.

INSPECTION COUNT/ INC COUNT:

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

W-191 **DOES THE SUBSEA BOP SYSTEM FOR WELL WORKOVER OPERATIONS INCLUDE OPERABLE DUAL-POD CONTROL SYSTEMS TO ENSURE PROPER AND INDEPENDENT OPERATION?**

Authority: 30 CFR 250.616(e) **Enforcement Action: S**
30 CFR 250.442(b)

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.

W-192 **DOES THE ACCUMULATOR CLOSING SYSTEM FOR WELL WORKOVER OPERATIONS, PROVIDE FAST CLOSURE OF THE SUBSEA 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 OR A SUITABLE ALTERNATE METHOD APPROVED BY THE DISTRICT MANAGER?**

Authority: 30 CFR 250.616(e) **Enforcement Action: S**
30 CFR 250.442(c)

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.

W-193 **DOES OPERATOR'S SUBSEA ACCUMULATOR PRECHARGE PRESSURE COMPENSATE FOR THE WATER DEPTH THE BOPS WILL BE OPERATING IN ACCORDANCE WITH API RP 53 SECTION 13.3.7?**

Authority: 30 CFR 250.616(e) **Enforcement Action: S**
30 CFR 250.442(c)

INSPECTION PROCEDURE:

Check records to verify that the subsea accumulator precharge pressure compensates for the water depth the BOPs will be operating in.

Note: For example, if the precharge pressure of the surface accumulator is 1,000 psi and the BOPs will be in 500ft water depth, the subsea accumulators must be precharged to 1,225 psi.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut in (**S**) INC if subsea accumulator precharge pressure does not compensate for the water depth the BOPs will be operating in.

INSPECTION COUNT/ INC COUNT:

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

W-194 **FOR SUBSEA BOP SYSTEMS, DID THE OPERATOR CALIBRATE ACCULUMATOR PRESSURE GAUGES TO ONE PERCENT OF FULL SCALE AT LEAST ONCE EVERY THREE YEARS FOR WELL WORKOVER OPERATIONS IN ACCORDANCE WITH API RP 53, SECTION 13.3.8?**

Authority: 30 CFR 250.616(e) **Enforcement Action: W**
30 CFR 250.442(c)

INSPECTION PROCEDURE:

Check records to verify that operator calibrated accumulator pressure gauges every three years to one percent of full scale.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if operator did not calibrate accumulator pressure gauges every three years to one percent of full scale.

INSPECTION COUNT/ INC COUNT:

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

W-195 **IS THE SUBSEA BOP STACK EQUIPPED WITH ROV INTERVENTION FOR WELL WORKOVER OPERATIONS?**

Authority: 30 CFR 250.616(e) **Enforcement Action: S**
30 CFR 250.442(d)
30 CFR 250.617(h)(1)

INSPECTION PROCEDURE:

1. Verify that each ROV is fully compatible with the BOP ROV Intervention panel.
2. Check records to verify that the ROV is capable of closing one set of pipe rams and one set of blind shears and unlatching LMRP.
3. Conditions permitting, witness:
   A. The ROV intervention functions on the subsea BOP stack during the stump test.
   B. The testing at least one set of rams during the initial test on the seafloor.
   C. The function testing of the ROV hot stabs to determine if they are capable of actuating a minimum of one set of pipe rams and one set of blind shear rams and unlatching the LMRP during the stump test.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC if the ROV function testing does not meet one or more of the requirements listed above.

INSPECTION COUNT/ INC COUNT:

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

W-196 **DOES THE SUBSEA BOP SYSTEM HAVE AN AUTOSHEAR AND DEADMAN SYSTEM FOR DYNAMICALLY POSITIONED RIGS FOR WELL WORKOVER OPERATIONS?**

Authority: 30 CFR 250.616(e) **Enforcement Action: S**
30 CFR 250.442(f)

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 performing well workover operations.

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 performing well workover operations.

INSPECTION COUNT/ INC COUNT

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

W-197 **DID THE OPERATOR INSTALL OPERATIONAL OR PHYSICAL BARRIER(S) ON A SUBSEA BOP CONTROL PANEL TO PREVENT ACCIDENTAL DISCONNECT FOR WELL WORKOVER OPERATIONS?**

Authority: 30 CFR 250.616(e) **Enforcement Action: W**
30 CFR 250.442(g)

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.

W-198 **DID THE OPERATOR CLEARLY LABEL ALL CONTROL PANELS FOR THE SUBSEA BOP SYSTEM FOR WELL-WORKOVER OPERATIONS?**

Authority: 30 CFR 250.616(e) **Enforcement Action: W**
30 CFR 250.442(h)

INSPECTION PROCEDURE:

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

Note: Test lights by depressing pushbutton on control panel to verify that the lights on the control panel are working properly.

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.

W-199 **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 FOR WELL-WORKOVER OPERATIONS?**

Authority: 30 CFR 250.616(e) **Enforcement Action: S**
30 CFR 250.442(i)

INSPECTION PROCEDURE:

1. Verify that management has written procedures for operating BOP stack and LMRP (including techniques to prevent accidental disconnections of these components).
2. Check all remote BOP control stations for by-pass to ensure 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).
2. If any BOP control stations functions are in by-pass.

INSPECTION COUNT/ INC COUNT:

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

W-200 **IS THE MARINE RISER DISPLACED WITH SEA WATER PRIOR TO REMOVAL FOR WELL-WORKOVER OPERATIONS?**

Authority: 30 CFR 250.616(e) **Enforcement Action: W**
30 CFR 250.442(k)

Note: Sufficient hydrostatic pressure must be maintained or other suitable precautions must be taken to compensate for the reduction in pressure and to maintain a safe and controlled well condition.

INSPECTION PROCEDURE:

Verify that the riser was properly displaced before removal.

IF NONCOMPLIANCE EXISTS:

Issue a warning (**W**) INC if records indicate the riser was not displaced with seawater.

INSPECTION COUNT/ INC COUNT:

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

W-201 **DO THE RECORDS INDICATE THAT THE WELL CELLAR IS AT THE APPROVED DEPTH TO ENSURE THAT THE TOP OF THE STACK IS BELOW THE DEEPEST PROBABLE ICE-SCOUR DEPTH FOR WELL-WORKOVER OPERATIONS?**

Authority: 30 CFR 250.451(h) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to ensure that the well cellar is at the approved depth.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC if the well cellar has not been excavated to the approved depth.

INSPECTION COUNT/ INC COUNT:

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

W-202 **DID THE OPERATOR CONDUCT A FUNCTION TEST ON THE DEADMAN SYSTEM ON THEIR SUBSEA BOP STACKS PRIOR TO CONDUCTING WELL-WORKOVER OPERATIONS DURING THE INITIAL TEST ON THE SEAFLOOR?**

Authority: 30 CFR 250.617(h)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that the function test on deadman system were in accordance with the approved APM.

Note: Records must be made available during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut in (**S**) if the operator did not conduct a function test on deadman system in accordance with the approved APM.

INSPECTION COUNT/ INC COUNT:

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

STUMP TEST

W-203 **DID THE OPERATOR TEST ALL ROV INTERVENTION FUNCTIONS ON THE SUBSEA BOP STACK DURING THE STUMP TEST?**

Authority: 30 CFR 250.617(h)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to verify that:

1. Operator conducted ROV intervention function test 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.

Note: Check records to verify that operator tested all ROV intervention functions in accordance with test procedures in the approved APM.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) if the operator did not conduct a function test during the stump test and ROV hot stab was not capable of actuating at a minimum one set of pipe rams, one set of blind shear rams, and unlatching the LMRP.

INSPECTION COUNT/ INC COUNT:

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

W-204 **DID THE OPERATOR TEST AT LEAST ONE SET OF RAMS WITH THE ROV ON THE SUBSEA BOP STACK UPON ITS INITIAL INSTALLATION ON THE SEAFLOOR?**

Authority: 30 CFR 250.617(h)(1) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to verify that the operator:

1. Tested at least one set of pipe rams on the subsea BOP stack upon its installation on the seafloor in accordance with the test procedures and approved APD or APM.
2. Submit test procedures with your APM for District Manager approval.

Note: Check records to verify that operator tested one set of rams on the subsea BOP stack upon its installation on the seafloor in accordance with the test procedures and approved APM.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) if the operator did not conduct a test at least one set of rams on the subsea BOP stack upon its initial installation on the sea floor.

INSPECTION COUNT/ INC COUNT:

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

W-205 **DID THE OPERATOR CONDUCT A FUNCTION TEST ON THE AUTOSHEAR AND DEADMAN SYSTEMS ON THEIR SUBSEA BOP STACKS DURING THE STUMP TEST?**

Authority: 30 CFR 250. 617(h)(2) **Enforcement Action: S**

INSPECTION PROCEDURE:

1. During the test of the deadman systems, verify the closure of at least one set of blind-shear rams for the initial test on the seafloor.
2. Verify function test of autoshear and deadman systems on the stump test were in accordance with the approved APM.

Note:

1. Operator must use water to stump test a subsea BOP system.
2. Operator may use drilling or completion fluids to conduct subsequent tests of a subsea BOP system.
3. Records must be made available during inspection

IF NONCOMPLIANCE EXISTS:

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

INSPECTION COUNT/ INC COUNT:

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

BOP TESTS, ACTUATORS, INSPECTIONS, AND MAINTENANCE

W-206 **AFTER EACH WELL DRILLED, DID OPERATOR CLEAN, VISUALLY INSPECT, PERFORM PREVENTIVE MAINTENANCE, AND PRESSURE TEST WELL-CONTROL EQUIPMENT BEFORE INSTALLATION ON THE NEXT WELL IN ACCORDANCE WITH API RP 53 SECTIONS 17.10 AND 18.10?**

Authority: 30 CFR 250.618(a) **Enforcement Action: S**

INSPECTION PROCEDURE:

Check records to verify that the operator cleaned, visually inspect, performed preventive maintenance, and pressure tested the well control equipment before installation on the next well.

Note: Well control equipment applies to both surface and subsea.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut in (**S**) INC if the operator did not clean, visually inspect, performed preventive maintenance and pressure tested 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.

W-207 **ARE ALL BOP STACKS, CHOKE MANIFOLDS, AND DIVERTER COMPONENTS USED DURING WELL WORKOVER OPERATIONS, DISASSEMBLED AND INSPECTED IN ACCORDANCE WITH THE EQUIPMENT MANUFACTURERS' GUIDELINES AFTER EVERY 3-5 YEARS OF SERVICE IN ACCORDANCE WITH API RP 53 SECTIONS 17.10 AND 18.10?**

Authority: 30 CFR 250.618(a)(1) **Enforcement Action: W/S**

INSPECTION PROCEDURE:

Verify that:

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 manufactures 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 manufacturers' recommendations.

Note: Records must be maintained on the rig for two years or from the date of you last major inspection, whichever is longer.

IF NONCOMPLIANCE EXISTS:

Issue a warning **(W)** INC if the component (BOP stack, 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 the operator has not disassembled and inspected all BOP stacks, choke manifolds, and diverter components in accordance with the equipment manufacturers' guidelines after every 3-5 years of service.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W-208 **IS THE WORKOVER SURFACE BOP SYSTEM VISUALLY INSPECTED ON A DAILY BASIS AND SUBSEA BOP SYSTEM AND MARINE RISER INSPECTED AT LEAST EVERY 3 DAYS, WEATHER AND SEA CONDITIONS PERMITTING?**

Authority: 30 CFR 250.618(a)(2) **Enforcement Action: W**

Note:

1. Weather and sea conditions are allowable reasons for not inspecting subsea BOP systems and marine risers at least daily.
2. You may use an ROV camera to inspect this equipment.

INSPECTION PROCEDURE:

Verify that the BOP systems and marine risers have been visually inspected 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 subsea BOP system inspected.

W-209 **ARE MANUFACTURERS' INSTALLATION, OPERATION, AND MAINTENANCE (IOM) MANUALS AVAILABLE ON THE RIG FOR ALL THE BOP EQUIPMENT INSTALLED ON THE RIG DURING WELL WORKOVER OPERATIONS IN ACCORDANCE WITH API RP 53 SECTIONS 17.11 AND 18.11?**

Authority: 30 CFR 250.618(b) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that manufacturers' installation, operation, and maintenance (IOM) manuals are available on the rig for all the well workover BOP equipment installed on the rig.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (**S**) INC if the manufacturers' 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.

W-210 **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 WELL WORKOVER BOP EQUIPMENT IN ACCORDANCE WITH API RP 53 SECTIONS 17.12 AND 18.12?**

Authority: 30 CFR 250.618(b) **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 they maintained on file at the rig site or readily available for the applicable well workover BOP equipment.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if the planned maintenance system is not being followed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

W- 211 **DOES THE 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 250.618(b) **Enforcement Action: S**

INSPECTION PROCEDURE:

Verify that 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.

W-212 **ARE SUBSEA BOP SYSTEM COMPONENTS STUMP PRESSURE TESTED AT THE SURFACE WITH WATER TO THE RATED WORKING PRESSURE OR AS APPROVED BY THE DISTRICT MANAGER?**

Authority: 30 CFR 250.617(a)(2) **Enforcement Action: W/S**
30 CFR 250.617(h)

INSPECTION PROCEDURE:

1. Verify that required tests were performed prior to installation.
2. If inspection is being performed when stump 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, workover 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.

W-213 **ARE SUBSEA ANNULAR-TYPE BOPS STUMP PRESSURE TESTED AT THE SURFACE WITH WATER TO 70 PERCENT OF THEIR RATED WORKING PRESSURE OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER?**

Authority: 30 CFR 250.617(a)(2) **Enforcement Action: W/S**
30 CFR 250.617(h)

INSPECTION PROCEDURE:

1. Verify that required tests were performed prior to installation.
2. If inspection is being performed when stump 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 workover operations but was pressure tested during initial seafloor installation.

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

INSPECTION COUNT/ INC COUNT:

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