



United States Department of the Interior  
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT  
WASHINGTON, DC 20240-0001

August 25, 2016

Holly A. Hopkins  
Senior Policy Advisor, Upstream  
American Petroleum Institute  
1220 L Street, NW  
Washington DC 20005

Dear Ms. Hopkins:

Thank you for your letter of July 15, 2016, concerning industry's remedial actions to address the issue related to the failure of subsea bolts and fasteners.

API's proposed action plan addresses the key areas that have been identified by BSEE as needing action by the industry. We would look forward toward collaborating with industry in the development of detailed and comprehensive implementation plans and timelines for each of these items. As you note in your letter, these plans may need to be modified or supplemented as new information or research becomes available. We anticipate working closely with the relevant industry committees, standards organizations, and subject matter experts to identify and resolve any new technical issues or concerns. We believe that an open dialogue between all participants on this topic is critical.

BSEE has received information related to the failure of subsea bolts and fasteners from a variety of sources. This data has been extremely useful in identifying the key technical concerns and the presence of an industry wide safety issue. However, it is likely that various companies and industry organizations have a significant amount of relevant information and analysis that have not been provided to either the Bureau or the rest of the industry. BSEE requests that API proactively encourage its membership to release any relevant data and studies as soon as possible to BSEE or through the SafeOCS program (<https://near-miss.bts.gov/>). SafeOCS is designed to protect reporting sources from legal exposure. Moreover, the potential safety and environmental concerns make this imperative for your industry as a whole.

Sincerely,

Douglas Morris  
Chief, Office of Offshore Regulatory Programs