UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT GULF OF MEXICO REGION

ACCIDENT INVESTIGATION REPORT

For Public Release 1. OCCURRED STRUCTURAL DAMAGE DATE: 16-NOV-2020 TIME: 0330 CRANE HOURS OTHER LIFTING 2. OPERATOR: EnVen Energy Ventures, LLC DAMAGED/DISABLED SAFETY SYS. **REPRESENTATIVE:** INCIDENT >\$25K TELEPHONE: H2S/15MIN./20PPM CONTRACTOR: Nabors Offshore Corporation REOUIRED MUSTER SHUTDOWN FROM GAS RELEASE REPRESENTATIVE: OTHER **spill** TELEPHONE: 3. OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVISOR 8. OPERATION: ON SITE AT TIME OF INCIDENT: PRODUCTION DRILLING 4. LEASE: G12136 WORKOVER LATITUDE: AREA: EW COMPLETION LONGITUDE: 873 BLOCK: HELICOPTER MOTOR VESSEL 5. PLATFORM: A (LOBSTER) PIPELINE SEGMENT NO. NABORS MODS 200 RIG NAME: OTHER 6. ACTIVITY: EXPLORATION(POE) 9. CAUSE: DEVELOPMENT/PRODUCTION (DOCD/POD) 7. TYPE: EQUIPMENT FAILURE INJURIES: HUMAN ERROR HISTORIC INJURY EXTERNAL DAMAGE CONTRACTOR **OPERATOR** SLIP/TRIP/FALL REQUIRED EVACUATION WEATHER RELATED LTA (1-3 days) LEAK LTA (>3 days) UPSET H20 TREATING RW/JT (1-3 days) OVERBOARD DRILLING FLUID RW/JT (>3 days) OTHER FATALITY 10. WATER DEPTH: 775 FT. Other Injury 11. DISTANCE FROM SHORE: 66 MI. POLLUTION 12. WIND DIRECTION: SSW FIRE SPEED: 7 M.P.H. EXPLOSION LWC | 13. CURRENT DIRECTION: HISTORIC BLOWOUT UNDERGROUND SPEED: 1 M.P.H. SURFACE 14. SEA STATE: 5 FT. DEVERTER SURFACE EQUIPMENT FAILURE OR PROCEDURES 15. PICTURES TAKEN:

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| |>\$25K

HISTORIC

COLLISION

16. STATEMENT TAKEN:

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On November 16, 2020, an incident occurred on the Nabors MODS 200, which was working under contract for Enven Energy Ventures LLC. Drilling operations were being conducted at Ewing Banks Block 873 Platform A (Lobster)OCS-G12136 Well A23, ST02. There was an unintentional discharge of approximately 458 barrels of synthetic based mud (SBM) into the Gulf of Mexico. The accidental discharge was due to an overboard discharge line in the mud pits that was left in the open position while transferring fluids from a supply vessel to the platform rig.

On the evening of November 16,2020, the night drill crew came on tour and attended a pre tour safety meeting. A Job Safety Analysis (JSA) and Fluid Transfer Permit was completed in preparation to transfer synthetic based mud (SBM) from an offshore supply vessel to the rig's mud pits. The documents were signed by the Toolpusher, Derrickman, and Shaker Hand. Once completed, the fluid transfer commenced by filling the active mud pits first followed by the reserve pit and return pit. There was an equalizer valve between the reserve pit and return pit that was left in the open position. Also, the valves between the Desander, Desilter and Degasser pit and mud clean out tank were left in the open position. As the transfer proceeded, the night crew noticed the Reserve pit and Return pit quit showing gains of fluid. Contact was made with the offshore supply vessel and requested that a second pump be switched on, thinking that the vessel was having problems with its first pump. With the second pump running, the crew began to see slow gains in the pits. The Derrickman decided to walk around and inspect the valve line-up discovering that the dump line valve was in the open position, allowing 458 barrels of synthetic based mud to dump into the Gulf of Mexico. The Derrickman immediately closed the valve and contacted the supervisors.

The Bureau of Safety and Environmental Enforcement (BSEE) Inspectors conducted an onsite inspection and investigation on November 18, 2020 and collected documentation for the incident. It was determined that approximately 458 barrels of 14.6 pound per gallon (PPG) SBM was unintentionally discharged into the Gulf of Mexico due to incorrect valve line up. Of this 458 barrels, 247 barrels was comprised of base oil. The investigation revealed that the valves were left in the open position by the day drilling crew during the cleaning of the mud pits. The day tour Derrickhand informed his relief, the night Derrickhand, that the valves were left in the open position after the cleaning was complete. Furthermore, there was a valve alignment procedure for the fluid transfer, but the Derrickhand and Shaker hand falsified the documentation by indicating that both individuals verified the valve alignment but in reality neither had done so.

Nabors held a stand down on the rig with all crew members to discuss the importance of following policies and procedures. Personnel changes were implemented for those responsible for the discharge. The JSA on fluid transfers has been updated to include not only fluid transfers but also cleaning tanks as well.

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

Improper valve alignment allowed SBM to be discharged into the Gulf of Mexico.

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

Personnel failed to follow procedures and verify valve alignment prior to pumping SBM.

20. LIST THE ADDITIONAL INFORMATION:

Personnel signed documentation stating they had verified valve alignment even though they had not done so.

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21. PROPERTY DAMAGED:

NATURE OF DAMAGE:

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N/A

N/A

ESTIMATED AMOUNT (TOTAL):

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

BSEE Houma District has no recommendations for the Office of Incident Investigations at this time.

- 23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: YES
- 24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:
 - (2) INC's issued for this incident:

E-100 Operator inadvertently discharged approximately 458 barrels of synthetic based mud (247 barrels of pure base oil) into the Gulf of Mexico during fluid transfer operations.

G-110 Operator failed to follow their own fluid transfer operation procedure, resulting in a non-permitted discharge of approximately 458 barrels of synthetic based mud (247 barrels of pure base oil) into the Gulf of Mexico.

25. DATE OF ONSITE INVESTIGATION:

28. ACCIDENT CLASSIFICATION:

18-NOV-2020

29. ACCIDENT INVESTIGATION PANEL FORMED:

26. INVESTIGATION TEAM MEMBERS:

OCS REPORT:

Jeremy Sonnier / Cedric Bernard / Clint Campo /

30. DISTRICT SUPERVISOR: Amy

27. OPERATOR REPORT ON FILE:

Pellegrin

APPROVED

DATE:

29-JAN-2021

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