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: 01-APR-2019 TIME: 0055 HOURS	CRANE
2. OPERATOR: LLOG Exploration Offshore, L.L.C REPRESENTATIVE: TELEPHONE:	OTHER LIFTING DAMAGED/DISABLED SAFETY SYS. INCIDENT >\$25K H2S/15MIN./20PPM
CONTRACTOR: Seadrill Limited REPRESENTATIVE: TELEPHONE:	REQUIRED MUSTER SHUTDOWN FROM GAS RELEASE OTHER
3. OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVION SITE AT TIME OF INCIDENT:	ISOR 8. OPERATION: PRODUCTION DRILLING
4. LEASE: G32301	WORKOVER
AREA: MC LATITUDE:	COMPLETION HELICOPTER
BLOCK: 199 LONGITUDE:	MOTOR VESSEL
	PIPELINE SEGMENT NO.
5. PLATFORM:	X OTHER Sidetrack Well
RIG NAME: SEADRILL WEST NEPTUNE	
6. ACTIVITY: X EXPLORATION(POE) DEVELOPMENT/PRODUCTION	9. CAUSE:
(DOCD/POD)	EQUIPMENT FAILURE
7. TYPE:	X HUMAN ERROR EXTERNAL DAMAGE
HISTORIC INJURY	SLIP/TRIP/FALL
REQUIRED EVACUATION	WEATHER RELATED
LTA (1-3 days)	LEAK UPSET H20 TREATING
LTA (>3 days	X OVERBOARD DRILLING FLUID
RW/JT (1-3 days) RW/JT (>3 days)	OTHER
Other Injury	_
☐ FATALITY	10. WATER DEPTH: 2528 FT.
X POLLUTION	11. DISTANCE FROM SHORE: 24 MI.
FIRE EXPLOSION	12. WIND DIRECTION: NNE
	SPEED: 20 M.P.H.
LWC HISTORIC BLOWOUT UNDERGROUND	13. CURRENT DIRECTION: NNW
SURFACE	SPEED: 1 M.P.H.
DEVERTER	
SURFACE EQUIPMENT FAILURE OR PROCED	URES 14. SEA STATE: 0 FT.
COLLISION HISTORIC >\$25K <=\$3	25K 15. PICTURES TAKEN:
	16. STATEMENT TAKEN:

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EV2010R 19-SEP-2019

At approximately 0055 hrs on 1 April 2019, LLOG Exploration Offshore LLC had a spill incident (61 bbls of Sythetic Oil-Based Mud [SBM]) on board Seadrill West Neptune Drillship while conducting drilling operations at Mississippi Canyon Block 199, OCS-G 32301. Sixty-one barrels of Synthetic Oil-Based Mud (SBM) spilled in the Gulf of Mexico (GOM) waters due to a misalignment of the trip tank valves (open/close) positions. At the time of the incident, the 61 bbls had a 62% synthetic make-up according to the mud eport. Therefore, the total pollution of the incident was 37.8 bbls.

At approximately 0055 hrs, the drill crew was in the process of pulling out of the hole with an 8.5" milling assembly on 5" drill pipe. The driller informed the Assistant Driller of the need for more drilling mud in order to compensate for the rest of the drill pipe to be pulled out of the hole. The Assistant Driller notified the Derrickman via radio to transfer mud from Trip Tank #1 to Trip Tank #2. The Derrickman opened two pneumatic valves that are tied into the Trip Tank dump line. The Derrickman opened the valves in order to let the tanks equalize their fluid levels. While monitoring the fluid levels via the digital Driller's panel, the Driller noticed Trip Tank #1's fluid level was dropping as Trip Tank #2's was filling (as it should). After roughly two minutes, the Driller observed Trip Tank #1 dropped substantially more volume than Trip Tank #2 was filling. The Driller immediately contacted the Derrickman and instructed him to suspend transfer operations. The Derrickman was already in the process of closing the pneumatic valves before the Driller attempted to contact him to suspend transfer operations.

The drilling crew immediately suspended operations and conducted an investigation into where the drilling fluid may have been going. The Derrickman then went to the lower processing room to inspect the line he was using for the equalization of the fluid levels in the Trip Tanks. Upon further investigation it was found that the master dump valve for the Trip Tanks was in the locked and open position, allowing 61 bbls of SBM flow into the overboard discharge line and into the GOM. This valve is a barrier in preventing drilling fluids from discharging fluids into the GOM when in the closed position.

On 4/2/19, BSEE inspectors arrived on location to conduct an investigation of the incident. Once on board the facility, all documentation relating to the incident was collected (JSA's, procedures, photos, statements, etc.). After discussion with the Captain of the ship, the transfer was not considered normal operations for transferring mud from pit to pit. The Derrickman is in charge of verifying proper valve alignment before all fluid transfers according to fluid transfer procedures. The Captain also informed the inspectors that the pit cleaning crews had possibly locked open the master dump valve and never returned it to its normally closed and locked position.

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

The crew did not follow proper procedures in transferring mud.

While performing the incorrect procedure to transfer mud, the crew misunderstood the positions of the valves plumbed to the Trip Tank. The pit cleaning crew may have locked open the master dump valve for the Trip Tank during cleaning operations, and never put back into its normally closed and locked position.

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19.	$I_1 I S I$	THE	CONTRIBUTING	CAUSE(S)	OF	ACCIDENT:

Not verifying the master dump valve for the trip tanks locked in the closed position.

Not following the procedures for mud pit transfer operations.

20. LIST THE ADDITIONAL INFORMATION:

21. PROPERTY DAMAGED:

NATURE OF DAMAGE:

61 barrels of SBM

Discharged overboard

ESTIMATED AMOUNT (TOTAL):

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

The BSEE New Orleans District makes no recommendations to the Office of Incident Investigation.

- 23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: YES
- 24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

E100 - 30 CFR 250.300(a)

On 4/1/19 at 0055 hrs, the operator discharged 61 barrels of 10.8 ppg synthetic based mud into OCS waters. The drilling crew's immediate investigation led them to find an opened trip tank dump valve. The opened valve allowed for discharge of the SBM in the GOM.

25. DATE OF ONSITE INVESTIGATION: 28. ACCIDENT CLASSIFICATION:

02-APR-2019

26. INVESTIGATION TEAM MEMBERS: 29. ACCIDENT INVESTIGATION PANEL FORMED: **NO**

OCS REPORT:

30. DISTRICT SUPERVISOR:

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David Trocquet For Public Release

Alvin Edwards / Lance Benedietto /

27. OPERATOR REPORT ON FILE:

APPROVED DATE: 17-SEP-2019

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