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: 29-JUL-2022 TIME: 0900 HOURS CRANE
2	OPERATOR: Cox Operating, L.L.C. OTHER LIFTING
۷.	DANAGED DIGABLED GATETI GIG.
	REPRESENTATIVE: INCIDENT >\$25K TELEPHONE: H2S/15MIN./20PPM
	CONTRACTOR: REQUIRED MUSTER
	REPRESENTATIVE: X SHUTDOWN FROM GAS RELEASE
	TELEPHONE:
2	OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVISOR 8. OPERATION:
٠.	ON SITE AT TIME OF INCIDENT:
	X PRODUCTION
4.	LEASE: G01084 DRILLING
	AREA: WD LATITUDE: WORKOVER
	BLOCK: 74 LONGITUDE:
	HELICOPTER MOTOR VESSEL
5.	PLATFORM: F PIPELINE SEGMENT NO.
	RIG NAME: OTHER
6.	ACTIVITY: EXPLORATION(POE)
	x DEVELOPMENT/PRODUCTION 9. CAUSE:
7.	TYPE:
	INJURIES: EQUIPMENT FAILURE
	HISTORIC INJURY HUMAN ERROR EXTERNAL DAMAGE
	OPERATOR CONTRACTOR SLIP/TRIP/FALL
	REQUIRED EVACUATION WEATHER RELATED
	\square LTA (1-3 days) \mathbf{x} LEAK
	LTA (>3 days) UPSET H20 TREATING
	RW/JT (1-3 days) RW/JT (>3 days) OVERBOARD DRILLING FLUID OTHER
	RW/JT (>3 days) FATALITY OTHER
	Other Injury 10. WATER DEPTH: 170 FT.
	11. DISTANCE FROM SHORE: 16 MI.
	POLLUTION
	FIRE 12. WIND DIRECTION:
	EXPLOSION SPEED: M.P.H.
	LWC HISTORIC BLOWOUT 13. CURRENT DIRECTION:
	UNDERGROUND SPEED: M.P.H.
	SURFACE
	DEVERTER 14. SEA STATE: FT.
	SURFACE EQUIPMENT FAILURE OR PROCEDURES 15. PICTURES TAKEN:
	COLLISION THISTORIC T > \$25K T <= \$25K 16. STATEMENT TAKEN:

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INCIDENT SUMMARY:

On 29 July 2022, a gas leak occurred at West Delta (WD) 74, Platform "F", a production platform owned and operated by Cox Operating, LLC (Cox). The leak was discovered on a 3" line on the KAH-F002 High Pressure (HP) gas pipeline pig trap. This resulted in the facility being manually shut in by platform operators. No injuries, pollution, or other damages occurred from this incident.

SEQUENCE OF EVENTS:

On 29 July 2022 at approximately 0900 hours (hrs), platform personnel discovered a gas leak from a 3" line located on the KAH-F002 HP gas pipeline pig trap. After the leak was found, platform operators manually shut in the facility. Once the facility was shut in, operators then isolated the leak and bled down the pressure until repairs could be made. The pipeline had 1020-1050 psi at the time of incident. On 31 July 2022, the associated piping was replaced.

BSEE INVESTIGATION:

On 3 August 2022, the incident was reported to the Bureau of Safety and Environmental Enforcement (BSEE).

On 10 August 2022, the BSEE Accident Investigator (AI) obtained documents from Cox associated with the leak and discovered that a Level 1 survey of the platform was performed on 26 April 2021. The piping was reported as "bad condition with heavy surface corrosion, active pitting, and scale covering approximately 40% of the surface." The survey also reported "metal loss due to active pitting and scale" was noted on the cellar deck piping and piping supports. The Level 1 inspection defined by API RP 2A, rated the piping on the platform to be in "Bad" condition with a "C" rating, indicating that mitigations needed to be taken within 1 year.

CONCLUSIONS:

Cox failed to properly maintain the platform piping. This is supported by the 26 April 2021 Level 1 survey that identified maintenance required within 1 year. As a result, corrosion of the associated piping led to the leak and caused the platform to have to be manually shut in.

- 18. LIST THE PROBABLE CAUSE(S) OF ACCIDENT:
- Equipment Failure Inadequate preventive maintenance: Lessee failed to maintain piping associated with KAH-F002 HP gas pipeline pig trap.
- 19. LIST THE CONTRIBUTING CAUSE(S) OF ACCIDENT:
- Management Systems Environmental control programs: Lessee failed to develop an environmental control program to combat the corrosion that led to the gas leak.
- 20. LIST THE ADDITIONAL INFORMATION:

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21. PROPERTY DAMAGED: NATURE OF DAMAGE:

Piping Corrosion

ESTIMATED AMOUNT (TOTAL):

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

The BSEE New Orleans Ditrict 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:
 - G111: DOES THE LESSEE MAINTAIN ALL EQUIPMENT IN A SAFE CONDITION TO PROVIDE FOR THE PROTECTION OF THE LEASE AND ASSOCIATED FACILITIES?

Lessee failed to maintain piping associated with the KAH-F002 HP gas pipeline pig trap, resulting in a gas leak that occurred on 29 July 2022 due to corrosion.

25. DATE OF ONSITE INVESTIGATION:

03-AUG-2022

26. INVESTIGATION TEAM MEMBERS:

Nathan Bradley /

27. OPERATOR REPORT ON FILE:

28. ACCIDENT CLASSIFICATION:

29. ACCIDENT INVESTIGATION

PANEL FORMED: NO

OCS REPORT:

30. DISTRICT SUPERVISOR:

David Trocquet

APPROVED

DATE: 14-SEP-2022