

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

ACCIDENT INVESTIGATION REPORT

For Public Release

1. OCCURRED

DATE: **11-FEB-2014** TIME: **1945** HOURS

2. OPERATOR: **Shell Offshore Inc.**

REPRESENTATIVE:

TELEPHONE:

CONTRACTOR: **Helmerich & Payne, Inc.**

REPRESENTATIVE:

TELEPHONE:

- STRUCTURAL DAMAGE
- CRANE
- OTHER LIFTING DEVICE
- DAMAGED/DISABLED SAFETY SYS.
- INCIDENT >\$25K
- H2S/15MIN./20PPM
- REQUIRED MUSTER
- SHUTDOWN FROM GAS RELEASE
- OTHER

3. OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVISOR
ON SITE AT TIME OF INCIDENT:

6. OPERATION:

4. LEASE: **G17565**

AREA: **AC** LATITUDE:

BLOCK: **857** LONGITUDE:

- PRODUCTION
- DRILLING
- WORKOVER
- COMPLETION
- HELICOPTER
- MOTOR VESSEL
- PIPELINE SEGMENT NO.
- OTHER

5. PLATFORM: **A(Perdido)**

RIG NAME: **H&P 205**

6. ACTIVITY: EXPLORATION (POE)
 DEVELOPMENT/PRODUCTION
(DOCD/POD)

8. CAUSE:

- EQUIPMENT FAILURE
- HUMAN ERROR
- EXTERNAL DAMAGE
- SLIP/TRIP/FALL
- WEATHER RELATED
- LEAK
- UPSET H2O TREATING
- OVERBOARD DRILLING FLUID
- OTHER

7. TYPE:

- HISTORIC INJURY
 - REQUIRED EVACUATION
 - LTA (1-3 days)
 - LTA (>3 days)
 - RW/JT (1-3 days)
 - RW/JT (>3 days)
 - Other Injury

- FATALITY
- POLLUTION
- FIRE
- EXPLOSION

- LWC HISTORIC BLOWOUT
- UNDERGROUND
 - SURFACE
 - DEVERTER
 - SURFACE EQUIPMENT FAILURE OR PROCEDURES

COLLISION HISTORIC >\$25K <=\$25K

9. WATER DEPTH: **7835** FT.

10. DISTANCE FROM SHORE: **140** MI.

11. WIND DIRECTION:
SPEED: **29** M.P.H.

12. CURRENT DIRECTION:
SPEED: M.P.H.

13. SEA STATE: **12** FT.

17. INVESTIGATION FINDINGS: -

Incident occurred on 11 February 2014 at AC 857 operated by Shell. Estimated spill was 144BBLs. The JSA dated February 12, 2014, titled Transferring mud from reserve pit to active pits utilized for the mud transferring operation during the time of incident occurring on February 11, 2014, does not make any mention for a procedure assuring the proper alignment of all dump valves on the mud pits after they were cleaned and before they were refilled.

Not all persons responsible for opening and closing the mud pit valves had signed the JSA for the mud transferring operation.

The JSA was not properly completed or executed due to incorrect date when the document was generated. Date Generated indicates 2-12-2014; the incident occurred 2-11-2014 during the JSA applicable operation.

The JSA was not properly completed or executed due to all personnel performing the job tasks during the time of incident failed to review the proper Lock Out/ Tag Out safety steps to be taken in order to properly identify the #3 Dump Valve was still in the open position as also documented in the H&P LO/TO/TRY Record Sheet.

The Lessee failed to properly gather a sample for the Static Sheen Test at the correct sample location prior to releasing pit fluids to gulf waters during the pit cleaning operation. Samples were gathered from the #4 Auxiliary Tank and the Trip Tank, but not the #3 Active Pit. The Dump Valve on the #3 Active Pit was utilized to discharge the pit fluids into the gulf waters. The #4 Auxiliary Tank was utilized in order to pre-stage the washing fluid for cleaning purposes.

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

Contractor did not follow JSA in place for opening and closing overboard discharge valves.

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

Piping layout design did have an isolation valve which would have provided another barrier against accidental discharge of mud into the Gulf of Mexico. See Attachment for Diagram.

20. LIST THE ADDITIONAL INFORMATION:

Witness statements detailing the events of the Synthetic Base Mud spill are contradictory in the date of the incident given in the reports. The Alleged Incident Report given by the Toolpusher states the incident occurred on February 11, 2014. The Alleged Incident Report given by the Tank Hand states the incident occurred on February 12, 2014. The Alleged Incident Report given by the Floorman states the incident occurred on February 12, 2014. In the official Timeline given by the lessee, the date of the incident is February 11, 2014. The Driller's Report states the date of the incident occurred on February 12, 2014.

Shell Offshore INC. has changed their operational procedures taken by H&P personnel for moving fluids between the mud tanks along with the planned installation of an additional valve downstream to eliminate the possibility of the issue happening again. Also Shell Offshore INC. has added procedures for reporting incidents to BSEE to prevent the incident from happening again.

21. PROPERTY DAMAGED:

none

NATURE OF DAMAGE:

none -

ESTIMATED AMOUNT (TOTAL):

22. RECOMMENDATIONS TO PREVENT RECURRENCE NARRATIVE:

The Lake Jackson District does not have any recommendation to the Regional OSM group related to this incident. See item 20 for recommendation to Shell.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: YES

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

G-110 AT THE TIME OF THE INVESTIGATION, THE LESSEE FAILED TO PERFORM ALL OPERATIONS IN A SAFE AND WORKMANLIKE MANNER AND PROVIDE FOR THE PRESERVATION AND CONSERVATION OF PROPERTY AND THE ENVIRONMENT.

E-841 AT THE TIME OF THE INVESTIGATION THE OPERATOR FAILED TO ORALLY REPORT WITHOUT DELAY TO BSEE.

E-100 During the investigation it was discovered the operator failed to prevent the unauthorized discharge of pollutants into offshore waters.

25. DATE OF ONSITE INVESTIGATION:

07-MAR-2014

26. ONSITE TEAM MEMBERS:

John Orsini / James Holmes /

29. ACCIDENT INVESTIGATION

PANEL FORMED: NO

OCS REPORT:

30. DISTRICT SUPERVISOR:

John McCarroll

APPROVED

DATE: 15-MAY-2014