

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: 27-NOV-2021 TIME: 0930 HOURS

2. OPERATOR: Talos Third Coast LLC

REPRESENTATIVE:

TELEPHONE:

CONTRACTOR: Performance Energy Service, LLC

REPRESENTATIVE:

TELEPHONE:

- STRUCTURAL DAMAGE
- CRANE
- OTHER LIFTING
- 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:

8. OPERATION:

4. LEASE: G23740

AREA: WC LATITUDE:

BLOCK: 96 LONGITUDE:

5. PLATFORM: B

RIG NAME:

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

6. ACTIVITY:

- EXPLORATION(POE)
- DEVELOPMENT/PRODUCTION (DOCD/POD)

9. CAUSE:

7. TYPE:

INJURIES:

HISTORIC INJURY

OPERATOR CONTRACTOR

REQUIRED EVACUATION

LTA (1-3 days)

LTA (>3 days)

RW/JT (1-3 days)

RW/JT (>3 days)

FATALITY

Other Injury

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

POLLUTION

FIRE

EXPLOSION

LWC HISTORIC BLOWOUT

UNDERGROUND

SURFACE

DEVERTER

SURFACE EQUIPMENT FAILURE OR PROCEDURES

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

10. WATER DEPTH: 42 FT.

11. DISTANCE FROM SHORE: 14 MI.

12. WIND DIRECTION: NE
SPEED: 10 M.P.H.

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

14. SEA STATE: 3 FT.

15. PICTURES TAKEN:

16. STATEMENT TAKEN:

On November 27, 2021, at approximately 09:30am, a flash fire occurred while removing skid pads with a torch on the top deck at West Cameron (WC) Block 96 platform B, operated by Talos Third Coast LLC (Talos). The flash fire occurred at the 24-inch manway cover of the water skimmer (MBM-0500). Talos hired Performance Energy Services (PES) as the construction crew, Tiger Rentals as the Health and Safety Advisor (HSE) and had a Talos company representative on board at the time of the incident.

On the morning of the incident at the 06:00am safety meeting, the Person in Charge (PIC) and the HSE held a daily safety meeting to review the job tasks and potential hazards. During the meeting, the PES supervisor, the PIC, the Talos company representative, and the HSE created the Job Safety Environmental Analysis (JSEA) and the Hot Work Permit (HWP) needed for the day's job tasks. All forms were approved during the 06:00am meeting without visiting the jobsite to verify all hazards were remediated. At approximately 09:30am the fire watch noticed slag falling from hot work operations on the deck above onto the water skimmer manway cover. The fire watch secured a fire extinguisher and stepped back when the flash fire occurred on the manway cover. The fire self-extinguished immediately. The fire watch notified the PES supervisor. The PES supervisor notified the Talos company representative and the HSE who responded to the site and Stop Work Authority was initiated. All personnel mustered on the Lift Boat New Orleans where all personnel were accounted for.

On November 29, 2021, The Bureau of Safety and Environmental Enforcement (BSEE) conducted an on-site incident follow-up. During the incident follow-up, BSEE investigators collected all available documents and made a request for all unavailable documents associated with the incident. BSEE investigators noted Trussco Inc (Trussco), a vessel cleaning crew arrived on November 20, 2021, cleaned the water skimmer on November 23, 2021, and departed before PES began hot work. A detailed cleaning procedure for the water skimmer was not developed by Talos for Trussco or available to BSEE investigators or PES during hot work activities. The BSEE investigators took pictures of the water skimmer and the area where hot work was being performed during the flash fire. BSEE Investigators discovered all the tarps used for hot work activities before and during the fire had been removed from the platform and sent to shore prior to the investigators arrival.

BSEE investigators interviewed personnel onboard the platform on the events leading up to the flash fire. After reviewing documents, statements, personnel comments, and a physical inspection of the work area, BSEE investigators found that the Talos company representative believed the water skimmer was rendered an inert vessel by the Trussco cleaning crew. BSEE investigators determined the vessel had only been cleaned of sand and sludge, leaving an undetermined amount of condensate in the oil bucket of the vessel thus not rendering it inert. Because the construction crew had additional work to do inside the water skimmer, the Talos company representative allowed the 24-inch manway cover to be loosely secured to the vessel with only 4 bolts. This allowed gas vapors from the condensate remaining in the water skimmer to escape through the unsealed manway. The manway cover of the water skimmer was not surveyed with the gas detector prior to the hot work beginning on the deck above. During the cutting of the skid pads, though the cutting area moved, the PES construction crew did not move the fire-retardant tarps from the previous work area. This allowed slag and sparks to fall directly onto the water skimmer manway cover igniting the combustible gas.

Through the interviews and documents collected, BSEE determined there was a lack of site-specific procedures for the vessel clean-out combined with a failure to follow through with a detailed description of work performed by the third-party Trussco cleaning crew led to a critical uninformed decision to leave the water skimmer manway hatch loose on the vessel.

BSEE investigators also noticed the JSEA and HWP were signed each day at 6:00am,

during the interview one of the personnel was asked if the work area was inspected before permits were signed, he stated, "no, because nothing changed from day to day". Jobsite walkthroughs each morning to identify hazards and discuss mitigations were not being performed. BSEE investigators did not get a clear response from the HSE, Talos company representative, or onsite production contract operator regarding where tarps were installed during the hot work. However, BSEE investigators did find totes with flammable contents and a flammable storage locker that were not shielded or moved 35 feet away from the hot work area.

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

BSEE investigators determined the vessel had only been cleaned of sand and sludge, leaving an undetermined amount of condensate in the oil bucket of the vessel. This allowed gas vapors to escape from the condensate through the unsealed manway cover. Slag and sparks fell directly onto the water skimmer and the manway cover igniting the combustible gas.

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

Communication - Talos company representative believed the water skimmer was rendered inert and allowed the manway cover to be loosely secured. The water skimmer contained condensate and combustible gas.

Supervision - Jobsite walkthroughs each morning to identify hazards and discuss mitigations were not being performed prior to hot work permits being approved.

Fire Watch - The manway cover of the water skimmer was not surveyed with the gas detector prior to the hot work beginning on the deck above.

20. LIST THE ADDITIONAL INFORMATION:

N/A

21. PROPERTY DAMAGED: NATURE OF DAMAGE:

N/A

ESTIMATED AMOUNT (TOTAL):

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

The BSEE Lake Charles 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:

G-303

IS EQUIPMENT CONTAINING HYDROCARBONS OR OTHER FLAMMABLE SUBSTANCES RELOCATED AT LEAST 35 FEET HORIZONTALLY FROM THE WELDING SITE, 35 FEET HORIZONTALLY FROM THE POINT OF IMPACT OF SLAG, SPARKS, OR BURNING MATERIALS AT A LOWER ELEVATION, OR IS IT OTHERWISE PROTECTED?
Authority: 30 CFR 250.113(a) Enforcement Actions: C

On November 27, 2021, at approximately 09:30 am, a flash fire occurred when slag fell onto the unsealed 24-inch manway cover of the water skimmer (MBM-0500).

A construction crew conducted "hot-work" with an oxygen-acetylene torch on the top deck of the platform, directly above the water skimmer, which was not rendered inert and remained open to the atmosphere.

25. DATE OF ONSITE INVESTIGATION:

29-NOV-2021

28. ACCIDENT CLASSIFICATION:

For Public Release

26. INVESTIGATION TEAM MEMBERS:

**Marcus Mouton / Mitchell Klumpp / Joey
Adams /**

29. ACCIDENT INVESTIGATION

PANEL FORMED: **NO**

OCS REPORT:

27. OPERATOR REPORT ON FILE:

30. DISTRICT SUPERVISOR: **Kim**

Jackson

APPROVED

DATE:

22-FEB-2022