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:	STRUCTURAL DAMAGE				
	21-SEP-2016 TIME: 0828 HOURS	CRANE				
		OTHER LIFTING DEVICE				
2.	OPERATOR: Energy XXI GOM, LLC	DAMAGED/DISABLED SAFETY SYS. INCIDENT >\$25K H2S/15MIN./20PPM REQUIRED MUSTER SHUTDOWN FROM GAS RELEASE				
	REPRESENTATIVE:					
	TELEPHONE:					
	CONTRACTOR: Wood Group Production Services					
	REPRESENTATIVE: TELEPHONE:					
	IELEPHONE.	OTHER				
3.	OPERATOR/CONTRACTOR REPRESENTATIVE/SUPERVISOR ON SITE AT TIME OF INCIDENT:	6. OPERATION:				
		x PRODUCTION				
		DRILLING				
4.	LEASE: 00367	WORKOVER				
	AREA: WD LATITUDE: 29.12853654	COMPLETION				
	BLOCK: 32 LONGITUDE: -89.69010213	HELICOPTER				
_		MOTOR VESSEL PIPELINE SEGMENT NO.				
5.	PLATFORM: E	OTHER				
	RIG NAME:	_ OTHER				
6.	ACTIVITY: EXPLORATION(POE)	8. CAUSE:				
	X DEVELOPMENT/PRODUCTION	X EQUIPMENT FAILURE				
7	(DOCD/POD) TYPE:	HUMAN ERROR				
		EXTERNAL DAMAGE				
	HISTORIC INJURY	SLIP/TRIP/FALL				
	REQUIRED EVACUATION	WEATHER RELATED LEAK VUPSET H20 TREATING OVERBOARD DRILLING FLUID OTHER				
	LTA (1-3 days)					
	LTA (>3 days RW/JT (1-3 days)					
	RW/JT (>3 days)					
	Other Injury	_				
		9. WATER DEPTH: 63 FT.				
	FATALITY X POLLUTION					
	FIRE	10. DISTANCE FROM SHORE: 10 MI.				
	EXPLOSION					
		11. WIND DIRECTION: SE				
	LWC HISTORIC BLOWOUT	SPEED: 5 M.P.H.				
	UNDERGROUND					
	SURFACE DEVERTER	12. CURRENT DIRECTION:				
	SURFACE EQUIPMENT FAILURE OR PROCEDURES	SPEED: 1 M.P.H.				
	COLLISION	13 SEA STATE: 1 FT				

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- 1. On Wednesday, 9/21/2016 at 8:30 am BSEE Inspectors tracked an oil sheen by helicopter, 7 miles long and 1 mile wide, back to WD 32 DAE Platform facilities. The volume estimated at 8.05 barrels of oil as reported to the USCG.
- 2. The Inspectors landed and found the facilities to be unmanned at the time of the incident. The platform was in-service and producing. There were no indications of equipment shut-in. The liquid outlet from the Freewater Knockout (MAM-100A), all wells, outflow to the LP System, pipelines KAQ-400A and KAA-500 and Compressor (CBA-900) were found in service.
- 3. Inspectors observed produced crude oil discharging out of the produced overboard water line from the WD 32 E platform into the Gulf Water's below. Thick, brown crude oil was visible at the water level and around the "E" Platform. The BSEE investigation revealed that the Fisher 2500 Overboard Water Level Controller was discharging oil and water out the overboard water outlet. In addition, the Fisher 2100 LSH 1 shut down device did not activate to initiate platform shut-in.
- 4. The Inspectors observed the (Wemco) Overboard Water Treatment Floatation Cell (ABM-410), located on the top deck, full of thick, brown, produced oil and dumping the oil out of the overboard water outlet, down to the Gulf Waters below. The Wet Oil Transfer Pump (PBA-410E) required transferring oil from the Floatation Cell's (ABM-410) oil chamber, failed to pump due to a stuck, internal pump shifting/slider valve.
- 5. Inspectors observed a work boat approaching 10 minutes later that dropped off Energy XXI personnel at the facility. The Inspectors directed personnel to immediately shut the platform in and stop the source of the oil discharge into the Gulf. BSEE Inspectors directed the Personnel In Charge (PIC) to report the pollution incident to the USCG to receive a NRC number. The NRC number issued was # 1159691 later to be updated to NRC # 1159663.
- 6. Inspectors issued the operator an E-100 Incident of Non-Compliance (INC) for this pollution event.
- 7. After follow up investigations and research, BSEE has issued an additional E-104 INC.

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

- 1. The Wet Oil Transfer Pump (PBA-410E) required to transfer oil from the Floatation Cell's (ABM-410) oil chamber, failed to pump due to a stuck, internal pump shifting/slider valve.
- 2. The oil level in the oil chamber raised up to the level with the produced water side of the floatation cell and flowed back into the overboard discharge chamber. As the Fisher 2500 Level Controller for the water discharge maintaines the preset level, oil was discharging out the overboard water outlet.
- 3. The Level Safety High (LSH 1) shut down device for the oil chamber was not installed in the oil chamber as requested by Energy XXI and approved by BSEE. As such, the high oil level in the oil chamber could not activate the shut in of: the liquid outlet from the Freewater Knockout (MAM-100A), all wells, outflow to the LP System, pipelines KAQ-400A and KAA-500 and Compressor (CBA-900).

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

The LSH 1 shut down device (Fisher 2100) was installed external to the overboard water chamber of the floatation cell and not in the oil chamber as required. The Fisher 2500 Level Controller, controlling the overboard water dump valve, discharged all fluids (water and oil) to maintain the preset level in the unit. Oil build up in the water chamber could not activate the LSH 1 shut down as the preset level was constantly maintained by the level controller.

20. LIST THE ADDITIONAL INFORMATION:

- 1. BSEE Inspectors were on their way to perform a scheduled inspection at WD 109 A when they discovered the sheen coming from WD 32 E. They flew a 10 mile area before trailing the sheen back to WD 32 DAE facility.
- 2. WD 32 DAE was an unmanned facility with 4 flowing wells. The average production rates are 95 106 Barrels Oil Per Day (BOPD) and 370 Barrels Water Per Day (BWPD).
- 3. The Level Safety Low (LSL 1) as well as the Level Safety High (LSH 1) shut down devices were not installed in the oil chamber of the floatation cell. They were installed external to the overboard water chamber.
- 4. A mystery sheen (NRC # 1159546) was reported by the operator to have been called in earlier that morning and another sheen (NRC #1159440) on the previous day, Tuesday, 9/20/2016.
- 5. Initially, Energy XXI did not identify WD 32 E as the source of the reported mystery sheen on 9/21/2016.
- 6. Energy XXI became the current designated operator in February 2014, formerly operated by Black Elk Energy Offshore Operations, LLC.
- 7. The WD DAE facility had an approved Pollution Inspection Frequency of 3 times per week; however, due to several reported nuisance overboard water upsets and sheens, and a recalculation of the pollution matrix, BSEE has rescinded the departure and requires a daily pollution inspection.
- 8. On 9/15/2016 during a Random BSEE Inspection, a small sheen from the Floatation Cell was observed by the inspectors who then requested the operator to call the NRC, NRC #1159048. The operator made adjustments to the chemical pump, no INC was issued.
- 9. Subsequently, a follow up inspection was made on 10/18/2016 by BSEE Accident Investigator and 2 Scientist with BSEE Water Quality Office of Environmental Compliance.

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None None

ESTIMATED AMOUNT (TOTAL):

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22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

BSEE New Orleans District makes no recommendations to the Office of Incident Investigations

Operator's action to prevent recurrance:

The LSH 1 (Fisher 2100) shut down device has been installed and functioned tested in the oil chamber of the floatation cell to prevent a carry-over of produced oil back into the water chamber and activate system shut in.

BSEE

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

E-100 The facility operator failed to prevent unauthorized discharge of hydrocarbons into offshore waters.

E-104 On 9/21/2016, it was discovered that the The Floatation Cell ABM-410 was not designed, installed, and operated to prevent pollution of offshore waters. The location of the LSH was not adequate to prevent hydrocarbons from entering the overboard water discharge, and the level control system was not properly maintained. This resulted in a carryover of hydrocarbons into the produced water and a discharge of pollutants into offshore waters on 9/21/2016. (LSH has been properly installed.

25. DATE OF ONSITE INVESTIGATION:

21-SEP-2016

26. ONSITE TEAM MEMBERS:

Gerald Taylor - Accident
Investigator / James Carrier Engineer / Steven Stonaker Engineer / Carl Bohling- Civil
Penalty Case Developer /

29. ACCIDENT INVESTIGATION PANEL FORMED: NO

OCS REPORT:

30. DISTRICT SUPERVISOR:

David Trocquet

APPROVED

DATE: 08-DEC-2016

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For Public Release INJURY/FATALITY/WITNESS ATTACHMENT

OPERATOR REPRESENTATE CONTRACTOR REPRESENT OTHER		
NAME: Lead O	perator	
HOME ADDRESS:		
CITY:	STATE:	
WORK PHONE:	TOTAL OFFSHORE EXPERIENCE:	YEA
EMPLOYED BY: Wood Gr	oup Production Services / 21503	
BUSINESS ADDRESS:		
CITY:	STATE:	
ZIP CODE:		
OPERATOR REPRESENTAT X CONTRACTOR REPRESENT	TIVE INJURY	
OPERATOR REPRESENTAT X CONTRACTOR REPRESENT	FIVE INJURY FATALITY X WITNESS	
OPERATOR REPRESENTAT CONTRACTOR REPRESENT OTHER	FIVE INJURY FATALITY X WITNESS	
OPERATOR REPRESENTAT CONTRACTOR REPRESENT OTHER NAME: A- Ope	FIVE INJURY FATALITY X WITNESS	
OPERATOR REPRESENTAT CONTRACTOR REPRESENT OTHER NAME: A- Ope HOME ADDRESS:	FIVE INJURY FATALITY X WITNESS	YEA
OPERATOR REPRESENTAT CONTRACTOR REPRESENT OTHER NAME: A- Ope HOME ADDRESS: CITY: WORK PHONE:	TIVE INJURY TATIVE FATALITY X WITNESS TRATE:	YEA
OPERATOR REPRESENTAT CONTRACTOR REPRESENT OTHER NAME: A- Ope HOME ADDRESS: CITY: WORK PHONE:	FIVE INJURY FATALITY X WITNESS TATE: TOTAL OFFSHORE EXPERIENCE:	YEA
OPERATOR REPRESENTAT CONTRACTOR REPRESENT OTHER NAME: A- Ope HOME ADDRESS: CITY: WORK PHONE: EMPLOYED BY: Wood Gr	FIVE INJURY FATALITY X WITNESS TATE: TOTAL OFFSHORE EXPERIENCE:	YEA

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POLLUTION ATTACHMENT

1.	VOLUME: G	GAL 8	3.05	BBL				
	12320 Y	YARDS LONG X	1760	YARDS	WIDE			
APPEARANCE: DARK BROWN								
2.	TYPE OF HYDROCARBO	N RELEASED: X	- -					
		L	DIESE	L				
		L	CONDE	NSATE				
			HYDRA	ULIC				
			NATUR	AL GAS				
			OTHER					
3.	SOURCE OF HYDROCAR	BON RELEASED:			er Float	Cell	(ABM-410)	overboard
4.	WERE SAMPLES TAKEN	? NO	water 1	line.				
5.	5. WAS CLEANUP EQUIPMENT ACTIVATED? NO							
	IF SO, TYPE:	SKIMMER						
	CONTAINMENT BOOM							
	ABSORPTION EQUIPMENT							
		DISPERSANTS						
		OTHER					_	
6.	ESTIMATED RECOVERY	: (GAL			BBL		
7.	RESPONSE TIME:	HOURS						
8.	IS THE POLLUTION IN ENVIRONMENTALLY SEN)? NO				
9.	HAS REGION OIL SPII	LL TASK FORCE	BEEN NO	rified?	? NO			
10.	CONTACTED SHORE:	NO IF YES	, WHERE	:				
11.	WERE ANY LIVE ANIMA	ALS OBSERVED N	EAR: NO					
12.	WERE ANY OILED OR I	DEAD ANIMALS O	BSERVED	NEAR S	SPILL:	NO		

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