

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

For Public Release

ACCIDENT INVESTIGATION REPORT

1. OCCURRED

DATE: **21-FEB-2024** TIME: **1319** HOURS

2. OPERATOR: **W & T Offshore, Inc.**

REPRESENTATIVE:

TELEPHONE:

CONTRACTOR: **Zealous Energy and Environmental**

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:

4. LEASE: **G13808**

AREA: **HI** LATITUDE:

BLOCK: **A 379** LONGITUDE:

5. PLATFORM: **B**

RIG NAME:

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

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

POLLUTION

FIRE

EXPLOSION

LWC HISTORIC BLOWOUT

UNDERGROUND

SURFACE

DEVERTER

SURFACE EQUIPMENT FAILURE OR PROCEDURES

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

8. OPERATION:

- PRODUCTION
- DRILLING
- WORKOVER
- COMPLETION
- HELICOPTER
- MOTOR VESSEL
- PIPELINE SEGMENT NO.
- DECOMMISSIONING
- PA PIPELINE SITE CLEARANCE
- TA PLATFORM
- OTHER

9. CAUSE:

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

10. WATER DEPTH: **390** FT.

11. DISTANCE FROM SHORE: **110** MI.

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

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

14. SEA STATE: FT.

15. PICTURES TAKEN:

16. STATEMENT TAKEN:

17. INVESTIGATION FINDINGS:

Incident Summary:

On February 21, 2024, at approximately 1349, the Bureau of Environmental Enforcement (BSEE) Production Operations Lead Inspector received a call from the W&T Offshore Safety Manager reporting a fire at the HI A 379 B facility operated by W & T Offshore, Inc. during construction operations.

The safety manager initially reported the fire was extinguished and provided updates as more information became available. The subsequent BSEE investigation, including a review of documents, statements, and an on-site inspection, confirmed that the fire occurred while grinding the deck as part of an approved construction operation.

Sequence of Key Events:

At approximately 1100 the Motor Vessel (M/V) Melissa was directed to return to port. At approximately 1349 a construction crew was working to replace corroded and worn deck plating. A construction fitter was utilizing an electric grinder to grind on the deck plate to smooth off freshly laid welds. During the grinding operations sparks migrated through two (2) layers of protective fire blanket barriers into a chemical/methanol storage area located just behind the protective barrier, approximately six feet (6') from the grinding area. This resulted in a fire, subsequently the Firewatch notified the construction crew, and all work was stopped. The alarm was then sounded and an Emergency Shut Down (ESD) was initiated, which shut-in the facility. The fire was extinguished using one (1) 125-pound (#) ABC wheeled fire extinguisher, two (2) 30 # fire extinguishers, and three (3) firewater hoses reels. The M/V Melissa was directed to return to the platform and was placed on standby. BSEE inspectors arrived on the platform to begin the investigation on 2/21/24. The BSEE Lake Jackson District Office directed W & T Offshore, Inc to not bring the platform back online until the cause of the fire could be determined and all hazards were mitigated.

BSEE Investigation:

The On-site BSEE investigation identified a fire did in fact occur in the area originally reported to BSEE. The BSEE investigators reported seeing fire extinguishing agent throughout the platform where the fire occurred. The BSEE investigation team noticed the fire was widespread. The initial inspection and pictures taken show two (2) poly stock tanks were melted and charred. Other areas showed a section of Continuously Corrugated Copper Weld (CLX) electrical cable was melted.

The Review of line-item number 17 of the W&T Offshore Hot Work Checklist states, "Equipment containing hydrocarbons or other flammable substances is 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 otherwise protected with flame-proof covers, shielded with metal or fire-resistant guards/curtains, or rendered inert." This line item was checked as yes. The Zealous Job Safety Analysis (JSA) clearly states "Remove all FLAMMABLE OR COMBUSTABLE ITEMS, Make sure no Hydrocarbons are present." The construction crew elected to use the third control measure of the W&T Offshore Hot Work Checklist, which was erecting fire blanket barriers between the work area and the chemical storage area, versus removing all flammable or combustible items as per the Zealous JSA. Utilizing the mentioned control measure did not eliminate the hazard.

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

Work Environment - Hazardous Workspace.

Storage and chemical tote tanks could have been moved to another area.

Human Performance Error - Not following proper procedures.

Written procedures in submitted documents clearly states to remove hydrocarbons prior to hot work commencing.

Supervision - Inadequate pre-job safety meeting.

As cited in the W&T investigation report "This is a failure in site leadership issue. Interviews with both the Zealous Foreman and the W&T PIC found that no discussion or consideration was given to the two written requirements cited in the Zealous JSA and the W&T Hot Work Safety Checklist. Both of these documents provided instructions for the removal of the flammable chemicals from the area. The JSA is not a list of recommendations or simple guidelines. It gives task specific instructions on how to complete the job safely and it is the responsibility of the PIC and Task Supervisor (Construction Foreman) to ensure control measures or in place and effective."

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

Equipment - Grinder

While grinding in the area sparks caused a fire by igniting hydrocarbons nearby.

Helicopter Operations - Incoming Helicopter

The W&T Offshore investigation report states, "In this case it would be likely that a spark generated by the grinding operation was unintentionally carried by the swirling winds generated during a helicopter landing operation, which was occurring just as the grinding work began."

20. LIST THE ADDITIONAL INFORMATION:

While reviewing W&T approved General Welding and Burning Plan this document contradicts the W&T Hot Work Checklist. W&T's approved General Welding and Burning Plan (IV. G Page 5 of 5) states in part "Equipment containing flammable substances shall be relocated at least 35 feet horizontally from the work site. If relocation is impractical, either the equipment shall be protected with flameproof covers or otherwise shielded with metal or fire-resistant guards or curtains, or the contents shall have been rendered inert." Whereas line-item number 17 on W&T's Hot Work Checklist states "Equipment containing hydrocarbons or other flammable substances is relocated at least 35 feet horizontally from the welding site or is otherwise protected with flame-proof covers, shielded with metal or fire-resistant guards/curtains, or rendered inert." The use of this should mirror 30 CFR 250.113(a) which states in part "Before you weld, you must move any equipment containing hydrocarbons or other flammable substances at least 35 feet horizontally from the welding area. If moving this equipment is impractical, you must protect that equipment with flame-proofed covers, shield it with metal or fire-resistant guards or curtains, or render the flammable substances inert."

A gap in approved welding plans may have been discovered and all approved welding and burning plans should state the proper Code of Federal Regulations "must be followed".

21. PROPERTY DAMAGED:

NATURE OF DAMAGE:

The damaged items include a Section of CLX cable (120V service), two (2) 30 # and one (1) 125 # fire extinguishers, and one (1) Poly Stock Tank.

All equipment was damaged by heat and melting of the items.

ESTIMATED AMOUNT (TOTAL): \$5,500

22. RECOMMENDATIONS TO PREVENT RECURRENCE NARRATIVE:

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT:

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

25. DATE OF ONSITE INVESTIGATION:

21-FEB-2024

26. Investigation Team Members/Panel Members:

27. OPERATOR REPORT ON FILE:

28. ACCIDENT CLASSIFICATION:

MINOR

29. ACCIDENT INVESTIGATION PANEL FORMED:

NO

OCS REPORT:

30. DISTRICT SUPERVISOR:

Stephen Martinez

APPROVED

DATE:

12-JUN-2024