

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: 20-JUN-2012 TIME: 1255 HOURS

2. OPERATOR: **Tarpon Operating & Development, L.**

REPRESENTATIVE:

TELEPHONE:

CONTRACTOR: **Hercules Offshore Drilling**

REPRESENTATIVE:

TELEPHONE:

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

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

6. OPERATION:

4. LEASE: **G27083**

AREA: **SM** LATITUDE:

BLOCK: **50** LONGITUDE:

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

5. PLATFORM:

RIG NAME: **HERCULES 204**

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 1
  - LTA (1-3 days)
  - LTA (>3 days) 1
  - 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: 105 FT.
10. DISTANCE FROM SHORE: 68 MI.
11. WIND DIRECTION: **ESE**  
SPEED: 17 M.P.H.
12. CURRENT DIRECTION:  
SPEED: M.P.H.
13. SEA STATE: FT.

17. INVESTIGATION FINDINGS: -

At approximately 1255 hours on 20 June 2012, a third-party contractor, employed by Gulf Copper, was injured while performing repair and construction activities in the mud pits on board the Hercules 204 rig located in the South Marsh Island Block 50 leased by Tarpon Operating and Development (Tarpon).

The accident occurred when the Injured Party (IP) returned from getting supplies from the rig deck when he re-entered the mud pit area. He did not recognize that the floor grating had been removed thus falling approximately 8 feet. The IP landed on the metal floor injuring his left hip and striking the left side of his head on a metal pipe ladder; however, he did not suffer loss of consciousness nor had any lacerations. He received medical attention at the rig and was flown to Terrebonne General Hospital located in Houma, LA for further treatment.

The IP was not aware that the grating had been removed when he returned from getting the supplies nor were there any physical barriers to warn personnel that the mud pit floor grating had been removed.

The Permit to Work (PTW) and Job Safety Analysis (JSA) written for construction operations in the mud pit area as well as procedures outlined in the Hercules Fall Protection Policy (Policy No. HSE 100.16) were not adhered to by the third-party contractor. The JSA did address the need for fall protection by requiring 100% tie-off at all times while working in the pits; however, it was not implemented by the third-party contractor. However, the JSA did not address that as work progressed in the mud pits, environmental conditions would change; thus, requiring all workers to remain in continuous communication with each other.

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

The IP was not aware that the mud pit floor grating had been removed when he returned from getting supplies nor were there any engineering controls such as a physical barrier to warn him that the mud pit floor grating had been removed.

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

The PTW was not adhered to by the third party contractor, -  
The JSA was not implemented by the third part contractor, -  
The JSA did not address the need for continuous communication. -

20. LIST THE ADDITIONAL INFORMATION:

The BSEE Lafayette District recommends that Hercules Offshore provide refresher and continuous training for rig personnel and site-specific training to third party contractors addressing specific elements listed in Permit to Work forms and Job Safety Analysis (JSA). Training should include the review of Hercules policies, such as fall protection, that applicable to a given job assignments. In addition, training should include methods of continuous communication between workers and the situational awareness of environmental changes.

21. PROPERTY DAMAGED: NATURE OF DAMAGE:  
No property damage occurred during this accident. None

ESTIMATED AMOUNT (TOTAL): N/A

22. RECOMMENDATIONS TO PREVENT RECURRANCE NARRATIVE:

The BSEE Lafayette District make no recomendations to the agency.

23. POSSIBLE OCS VIOLATIONS RELATED TO ACCIDENT: YES

24. SPECIFY VIOLATIONS DIRECTLY OR INDIRECTLY CONTRIBUTING. NARRATIVE:

The BSEE issued a G-110 Incident of Noncompliance to Tarpon on June 22, 2012, for the failure to protect the health and safety of employees by not property barricading open holes and insuring that employees were adhering to fall protection procedures.

On July 17, 2012, the BSEE received an INC rescission request from Tarpon based on that at the time the INC was issued; Tarpon was not conducting any well operations on the lease. The Hercules 204 rig was jacked-up on Tarpon's lease performing only construction and maintenance activities.

The INC rescission request was forwarded to the Office of the Solicitor within the U.S. Department of Interior, Division of Mineral Resources for jurisdictional interpretation. The Office of the Solicitor recommended that the INC should be rescinded for two reasons both based on the OCS Lands Act: 1) the rig was not latched up to a well and 2) at the time of the accident, the rig was not jacked up "for the purpose of exploring for, developing, or producing resources therefrom." Therefore, the BSEE rescinded the G-110 INC per the Office of Solicitor's conclusion and forwarded the incident to the U.S. Coast Guard.

25. DATE OF ONSITE INVESTIGATION:

22-JUN-2012

26. ONSITE TEAM MEMBERS:

Ernest Carmouche / Troy Naquin /

29. ACCIDENT INVESTIGATION

PANEL FORMED: NO

OCS REPORT:

30. DISTRICT SUPERVISOR:

Elliott S. Smith

APPROVED  
DATE:

08-AUG-2012

# INJURY/FATALITY/WITNESS ATTACHMENT

OPERATOR REPRESENTATIVE

INJURY

CONTRACTOR REPRESENTATIVE

FATALITY

OTHER Third Party Contractor

WITNESS

NAME:

HOME ADDRESS:

CITY:

STATE:

WORK PHONE:

TOTAL OFFSHORE EXPERIENCE:

YEARS

EMPLOYED BY:

BUSINESS ADDRESS:

CITY:

STATE:

ZIP CODE:

OPERATOR REPRESENTATIVE

INJURY

CONTRACTOR REPRESENTATIVE

FATALITY

OTHER Third Party Contractor

WITNESS

NAME:

HOME ADDRESS:

CITY:

STATE:

WORK PHONE:

TOTAL OFFSHORE EXPERIENCE:

YEARS

EMPLOYED BY:

BUSINESS ADDRESS:

CITY:

STATE:

ZIP CODE:

# INJURY/FATALITY/WITNESS ATTACHMENT

OPERATOR REPRESENTATIVE

INJURY

CONTRACTOR REPRESENTATIVE

FATALITY

OTHER Third Party Contractor

WITNESS

NAME:

HOME ADDRESS:

CITY:

STATE:

WORK PHONE:

TOTAL OFFSHORE EXPERIENCE:

YEARS

EMPLOYED BY:

BUSINESS ADDRESS:

CITY:

STATE:

ZIP CODE:

