



T-103

**DOES THE OPERATOR ENSURE ACTIVITIES AUTHORIZED IN THIS PART ARE CARRIED OUT IN A MANNER THAT PROVIDES FOR PROTECTION OF THE ENVIRONMENT?**

**Authority: 285.102(2)**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

Visually check the waters surrounding the facility when en route to, approaching, departing, or passing a facility by boat, helicopter, or fixed wing aircraft. Look for sheens, slicks, wastes, and other pollutants originating from the facility, risers, or pipelines. During the facility inspection, check the water for signs of any pollutants.

**IF NONCOMPLIANCE EXISTS**

Issue a warning (W) INC if:

The cause of the discharge has been identified and corrected prior to the inspection or observation, and no further pollution is occurring.

Issue a component shut-in (C) INC if:

A specific component has been determined to be the cause of pollution and the pollution is ongoing at the time of the inspection or observation.

Issue a facility shut-in (S) INC if:

More than one specific component has been determined to be the cause of the pollution and the pollution is ongoing at the time of the inspection or observation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility.

T-104

**DOES THE OPERATOR ENSURE ACTIVITIES AUTHORIZED IN THIS PART ARE CARRIED OUT IN A MANNER THAT PROVIDES FOR PREVENTION OF WASTE?**

**Authority: 285.102(3)**

**Enforcement Action: W/C/S**

Verify that lessee's operating procedures includes written guidance that describe the requirements for proper disposal of materials or by- products to the environment.

**IF NONCOMPLIANCE EXISTS**

Issue a warning (W) INC if:

The cause of the discharge has been identified and corrected prior to the inspection or observation, and no further pollution is occurring.

Issue a component shut-in (C) INC if:

A specific component has been determined to be the cause of pollution and the pollution is ongoing at the time of the inspection or observation.

Issue a facility shut-in (S) INC if:

More than one specific component has been determined to be the cause of the pollution and the pollution is ongoing at the time of the inspection or observation.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility.

T-105

**DOES THE LESSEE MAINTAIN AND MAKE RECORDS AVAILABLE FOR INSPECTION BY MMS PERSONNEL?**

**Authority: 30 CFR 285.602**

**Enforcement Action: W**

**714**

**INSPECTION PROCEDURE:**

1. Verify that Lessee maintains and provides to MMS upon request all data and information related to compliance with required terms and conditions of your SAP, COP, or GAP.
2. Verify the availability of all records relative to the operation and maintenance of the facility.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the lessee:

1. Denies access to any facility covered by the lease or regulations.
2. Does not make pertinent records available for inspection.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per report audited.

## SITE ASSESSMENT PLAN (SAP)

T-106

### **ARE ACTIVITIES CONDUCTED IN ACCORDANCE WITH THE SITE ASSESSMENT PLAN (SAP) WHICH HAS BEEN APPROVED BY THE MMS?**

**Authority: 30 CFR 285.617(b)**

#### **INSPECTION PROCEDURE:**

Verify that:

- 1) Operations are being conducted in accordance with Lessee's approved SAP, and that it is available for review during the audit.
- 2) Verify that an "approval letter" from the MMS concerning acceptance of the "SAP" is available for review.

#### **IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the situation poses no immediate danger to personnel or equipment. Issue a component shut-in (C) INC for a specific piece of equipment or location when it is found to be part of an unsafe situation if it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.

Issue a facility shut-in (S) INC when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

#### **INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility, per enforcement action.

## **CONSTRUCTION AND OPERATION PLAN (COP)**

T-107

### **ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH THE CONSTRUCTION AND OPERATIONS PLAN (COP) WHICH HAS BEEN APPROVED BY THE MMS?**

**Authority: 30 CFR 285.620**

**Enforcement Action: W/C/S**

#### **INSPECTION PROCEDURE:**

Verify that:

1. Operations are being conducted in accordance with Lessee's approved COP, and that it is available for review during the audit.
- 3) Verify that an "approval letter" from the MMS concerning acceptance of the "COP" is available for review.

#### **IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the situation poses no immediate danger to personnel or equipment. Issue a component shut-in (C) INC for a specific piece of equipment or location when it is found to be part of an unsafe situation if it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.

Issue a facility shut-in (S) INC when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

#### **INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility, per enforcement action.

**GENERAL ACTIVITY PLAN (GAP)**

**T-108**

**DOES THE LESSEE'S GENERAL ACTIVITIES PLAN (GAP) INCLUDE REQUIREMENTS FOR LIMITED LEASES, ROW GRANTS AND RUE GRANTS?**

**Authority: 30 CFR 285.640  
285.641  
650**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE**

Verify that:

1. GAP describes all proposed construction, activities, and conceptual decommissioning plans for all planned facilities, including testing of technology devices and onshore and support facilities that Lessee will construct and use for their project, including any project easements for the assessment and development of limited lease or grant.
2. MMS approved the COP before operator began any of the approved activities on the lease.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (**W**) INC when the situation poses no immediate danger to personnel or equipment. Issue a component shut-in (**C**) INC for a specific piece of equipment or location when it is found to be part of an unsafe situation if it poses an immediate danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.

Issue a facility shut-in (**S**) INC when the unsafe situation poses an immediate danger to the entire facility or personnel and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility, per enforcement action.

**T-109**

**DID THE LESSEE NOTIFY MMS IN WRITING BEFORE CONDUCTING ANY ACTIVITIES NOT DESCRIBED IN APPROVED GENERAL ACTIVITIES PLAN (GAP)?**

**Authority: 30 CFR 285.655**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

1. Verify that lessee notified MMS in writing before conducting any activities not described in their approved GAP.
2. Verify that Lessee describes in detail the type of activities they are proposing to conduct.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (**W**) INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted.

Issue one component shut-in (**C**) INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review without notifying MMS.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility.





T-114

**DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE THEIR EMERGENCY RESPONSE PROCEDURES?**

**Authority: 30 CFR 285.810(c)**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

Verify that Lessee's SMS include procedures for emergency action plans such as:

1. Spills of hazardous substances
2. Collisions
3. Fire
4. Oil spill contingency plan.
5. Safety and environmental information

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in (C) INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in (S) INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility, per enforcement action.

T-115

**DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE THEIR FIRE SUPPRESSION EQUIPMENT ?**

**Authority: 30 CFR 285.810(d)**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

Verify that Lessee's SMS include procedures for fire suppression equipment such as:

1. Firewater system (if needed)
  - A. Visually inspect to verify that firewater systems are installed.
  - B. Request that operator initiate actuation test of all fire water systems and pumps on facility.
2. Chemical system - Visually inspect to verify that chemical systems are installed.
3. Verify that a diagram of the firefighting system showing the location of all firefighting equipment is posted in a prominent place on the facility.
4. Visually inspect to verify that fire (flame, heat, or smoke) sensors are installed.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in (C) INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in (S) INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility, per enforcement action.

T-116

**DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE HOW AND WHEN THE SAFETY MANAGEMENT SYSTEM WILL BE TESTED?**

**Authority: 30 CFR 285.810(e)**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

1. Verify that Lessee's SMS include a test program and procedures that covers:
  - a. The activities and areas to be considered in tests.
  - b. The frequency of tests
  - c. The test team
  - d. How test will be conducted
  - e. Test reporting
2. Verify through records review that SMS is being tested.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (**W**) INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in (**C**) INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in (**S**) INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility, per enforcement action.

T-117

**DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE HOW LESSEE WILL ENSURE PERSONNEL WHO OPERATE THEIR FACILITY ARE PROPERLY TRAINED?**

**Authority: 30 CFR 285.810(f)**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

Verify that

1. Procedures are developed to ensure that persons assigned to operate and maintain the facility possess the required knowledge and skills to carry out their duties and responsibilities.
2. Lessee's training plan includes procedures on verifying that employees received training once any alterations in facilities require new or modification of existing operating procedures.
3. Lessee's training plan includes procedures on verifying that employees received training on operating procedures, safe work practices, and emergency response and control measures.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (**W**) INC when the situation poses no immediate danger to personnel, equipment, or the environment.

Issue a component shut-in (**C**) INC for a specific piece of equipment or location when it is found to be part of an unsafe situation and poses an immediate danger to personnel, equipment, or the environment.

Issue a facility shut-in (**S**) INC when the unsafe situation poses an immediate danger to the entire facility or personnel, and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility, per enforcement action.

## **MAINTENANCE AND SHUTDOWNS**

**T-118**

**HAS THE MMS BEEN NOTIFIED WITHIN 24 HOURS WHEN EQUIPMENT IS REMOVED FROM SERVICE FOR MORE THAN 12 HOURS?**

**Authority: 30 CFR 285.813**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

1. Verify that the lessee or the ROW holder has reported any equipment taken out of service to the MMS.
2. Verify from office records that a written report was submitted to MMS within three business days prior to equipment removal for more than 12 hours.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility.

## **EQUIPMENT FAILURE AND ADVERSE ENVIRONMENTAL EFFECTS**

**T-119**

**HAS A PLAN OF CORRECTIVE ACTION FOR ENVIRONMENTAL OR OTHER CONDITIONS ADVERSELY AFFECTING A CABLE, PIPELINE, OR FACILITY BEEN SUBMITTED TO THE MMS?**

**Authority: 30 CFR 285.816(a)**

**Enforcement Action: W/C**

**INSPECTION PROCEDURE:**

Verify that a plan of corrective action of observed detrimental environmental factors affecting a cable, pipeline, or facility was submitted to the MMS within 30 days of the observation.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for a corrective plan audit if a plan of corrective action for observed detrimental environmental factors affecting a pipeline was not submitted to the MMS for approval within 30 calendar days of the observation.

Issue one component shut-in (C) INC for a corrective plan audit if:

1. A plan of corrective action was not prepared for known detrimental environmental factors that would affect a cable, pipeline, or facility.
2. After a review of the report, the MMS cannot determine that proposed corrective action would not threaten or result in serious, irreparable, or immediate harm or damage to life (including fish or other aquatic life), property, mineral deposits, or the marine, coastal, or human environment.

**Note:** The cable, pipeline, or facility is the component.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per component audited.

T-120

**DOES LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DETERMINE WHETHER PROPER SAFETY EQUIPMENT HAS BEEN INSTALLED AND IS OPERATING SAFELY?**

**Authority: 30 CFR 285.820(b)**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

Verify that safety equipment is installed and operated in accordance with Lessee's safety management system program.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more activities or operations on a facility if paperwork has not been submitted within the required time frame and activity or operation is not currently being conducted. Issue one component shut-in (C) INC for an audit of one or more activities or operations on a facility if the activity or operation is being conducted at the time of the review.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility.

T-121

**DOES THE LESSEE MAKE ALL FACILITIES AND DESIGNATED RECORDS AVAILABLE FOR INSPECTION BY MMS PERSONNEL?**

**Authority: 30 CFR 285.822**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

Verify

1. The availability for inspection by MMS representatives, all facilities and other installations located on offshore leases.  
for installations equipped with helicopter and boat landing sites verify the availability of the use of these facilities for use by MMS.
2. The availability of all records relative to the operation and maintenance of the facility.
3. All records of design, construction, operation, maintenance, repairs, or investigations on or related to the area.

**IF NONCOMPLIANCE EXISTS:**

Issue a warning (W) INC when the lessee:

1. Denies access to any facility covered by the lease or regulations.
2. Does not make pertinent records available for inspection.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility inspected.

T-122

**DOES LESSEE CONDUCT COMPREHENSIVE ANNUAL SELF-INSPECTIONS ON ALL OF THEIR FACILITIES?**

**Authority: 30 CFR 285.824**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

Verify that

1. Lessee developed a comprehensive annual self-inspection plan covering all facilities.
2. Self- inspections are being conducted at prescribed or approved intervals.
3. Weather conditions, e.g. fog, solid ice, that prevent self-inspections are recorded in the inspection log.
4. Inspection records are being maintained at the facility or a nearby manned facility.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility.

T-123

**DOES LESSEE DEVELOP A COMPREHENSIVE SELF-INSPECTION PLAN THAT ADDRESS SELF- INSPECTIONS ABOVE – WATER AND BELOW -WATER FOR ALL OF THEIR FACILITIES?**

**Authority: 30 CFR 285.824 (a)(1)&(2)**

**Enforcement Action: W/C/S**

**INSPECTION PROCEDURE:**

Verify that lessee's inspection plan addresses

1. The type, extent, and frequency of in-place inspections conduct for both the above-water and the below-  
water structures of all facilities and pertinent components of the mooring systems for any floating facilities;
2. Monitoring the corrosion protection for both the above-water and below-water structures.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more operations if the violation(s) of the plan poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations if the violation(s) of the plan poses an immediate danger to personnel, equipment, or the environment and the operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the plan poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per facility.

## ACCIDENT REPORTING

T-124

**HAS THE MMS BEEN NOTIFIED WITH A WRITTEN REPORT WITHIN 15 DAYS OF THE INCIDENT INVOLVING ALL: FATALITIES, INJURIES INVOLVING LOST TIME AND EVACUATION, FIRES, EXPLOSIONS, COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS, SAFETY SYSTEM DAMAGES, PERSONNEL/MATERIAL HANDLING ACTIVITIES, FIREFIGHTING SYSTEMS, ALL INCIDENTS THAT RESULT IN DAMAGES GREATER THAT \$25,000, AND ALL INCIDENTS THAT REQUIRE PERSONNEL TO MUSTER FOR EVACUATION?**

**Authority: 30 CFR 250.831  
30 CFR 250.832**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Verify that the MMS has been notified of all the above listed incidents connected with any activities on a lease.
2. Verify that all reporting requirements listed in 30 CFR 285. 831, 833 have been included and submitted to the MMS in a written report within 15 days of the incident.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an incident/accident on a lease if the MMS has not been notified by the lessee as required.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per incident audited.

T-125

**HAS THE MMS BEEN ORALLY NOTIFIED COMMUNICATION IMMEDIATELY FOLLOWING INCIDENTS INVOLVING ALL: FATALITIES, INJURIES REQUIRING EVACUATION, FIRES, EXPLOSIONS, COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS AND SAFETY SYSTEM DAMAGES, PERSONNEL/MATERIAL HANDLING ACTIVITIES, FIREFIGHTING SYSTEMS, ALL INCIDENTS THAT RESULT IN DAMAGES GREATER THAT \$25,000, AND ALL INCIDENTS THAT REQUIRE PERSONNEL TO MUSTER FOR EVACUATION?**

**Authority: 30 CFR 250.831  
250.832  
250.833**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Verify that the MMS has been notified of all the above listed incidents connected with any activities on a lease.
2. Verify that all reporting requirements listed in 30 CFR 285.831, 832 have been included and submitted to the District Manager via oral communication immediately following the above incident.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an incident/accident on a lease and/or OCS facility if the MMS has not been notified by the lessee or operator as required.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per incident audited.

## DECOMMISSIONING

**T-126 ARE PROJECTS, FACILITIES, CABLES, AND PIPELINES OUT OF SERVICE FOR 2 YEARS, OR MORE,**

**REMOVED IF THE MMS DETERMINES THEM TO BE OBSTRUCTIONS?**

**Authority: 30 CFR 285.902**

**Enforcement Action: W**

**INSPECTION PROCEDURE:**

1. Verify that facilities, projects, cables, and pipelines out of service for 2 years, or more are removed if MMS determines them as obstructions.

2. Verify that the seafloor is cleared of all obstructions created by activities out-of-service.

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC if the out-of-service facilities, projects, cables, and pipelines are not removed as required.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per cable, pipeline or facility audited.

**T-127 DID LESSEE SUBMIT DECOMMISSIONING APPLICATION AND RECEIVE APPROVAL FROM MMS BEFORE DECOMMISSIONING?**

**Authority: 30 CFR 285.902(b)&(c)**

**Enforcement Action:**

**W/C/S**

**INSPECTION PROCEDURE:**

Verify that decommissioning operations are being conducted after submitting and receiving approval from MMS on decommissioning application.

**Note:** The approval of the decommissioning concept in the SAP, COP, or GAP is not an approval of a decommissioning application

**IF NONCOMPLIANCE EXISTS:**

Issue one warning (W) INC for an audit of one or more operations on a facility if the violation(s) of the stipulation(s) poses no immediate danger to personnel, equipment, or the environment.

Issue one component shut-in (C) INC for an audit of one or more operations on a facility if the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment; and operation(s) can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the stipulation poses an immediate danger to the entire facility, personnel, or the environment and the operation(s) cannot be shut-in without affecting the overall safety of the facility.

**INSPECTION COUNT/ INC COUNT:**

Enter one item checked/ issue one INC per lease audited.