

MMS

**NATIONAL
OFFICE
POTENTIAL INCIDENT
OF
NONCOMPLIANCE (PINC)
LIST**



PREFACE

The Safety and Enforcement Branch of the Engineering and Operations Division wish to extend our appreciation to all participating MMS personnel for their dedicated effort and expertise in developing this edition of the National Office PINC List.

PINC NUMBER: A unique identifier for the specific requirement.

PINC STATEMENT: The clear and concise description of the requirement.

AUTHORITY: The regulatory authority as found in the Code of Federal Regulations.

ENFORCEMENT ACTION: This is the enforcement action(s) that must be taken by the MMS for an identified violation(s) of the regulations. Enforcement action(s) may result in a complete facility shut-in (S), a component shut-in (C), or a warning (W). A substantial number of the Potential Incidents of Noncompliance (PINCs) provide enforcement actions in all three enforcement categories [W/C; W/C/S]. Multiple enforcement action(s) [W/C; W/C/S] may be issued to document severity of identified violations. When multiple enforcement actions [W/C or W/C/S] are provided in the PINC, the criteria for each level of enforcement action are provided in the "IF NONCOMPLIANCE EXISTS" section of the PINC.

RATIONALE/NOTE: Additional information describing the basis or providing background information pertinent to the requirement stated in the "PINC Statement" block.

DEFINITION: Definitions of terms used in the PINC.

INSPECTION PROCEDURE: Preferred detailed guidelines to be used by MMS personnel to ensure that the stated requirement is met. **However, the guidelines in this document are to be considered the preferable method of implementing the enforcement of each PINC and not intended as a directive or to supersede the regulatory language in the Code of Federal Regulations.**

INSPECTION COUNT: Describes the number of items checked to be entered on the inspection form. An incident of noncompliance (INC) must be issued to document any negative (no) answer to a PINC statement.

Examples:

1. Enter one item checked per facility inspected.

One (1) is entered in the "# CK" column on the inspection form and answered one [1] in the "#Y" or "#N".

2. Enter one item checked for each safety device inspected.

A total count of the number of safety devices, components, wells, etc., is entered in the "#CK" column on the inspection form. The total entries in the "#Y", "#N", and "#N/A" columns must correspond to the total count in the "#CK" column.

IF NONCOMPLIANCE EXISTS: Describes the specific enforcement action to be taken for each identified violation and the severity level of each violation of the regulations. Examples:

1. Issue a warning (W) incident of noncompliance when the situation poses no immediate danger to personnel or equipment.
2. Issue a component (C) incident of noncompliance for a specific piece of equipment or location when it is determined to be part of an unsafe situation or it poses an immediate

- danger to personnel or other equipment and it can be shut-in without affecting the overall safety of the facility.
3. Issue a structure (S) incident of noncompliance 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.

INCIDENT(S) OF NONCOMPLIANCE TO BE ISSUED/ INC COUNT: Dictates the specific number of incident(s) of noncompliance to be issued for identified violation(s) of the regulations.

Examples:

1. Issue one incident of noncompliance for each facility inspected.

One (1) incident of noncompliance is issued on each facility inspected with detailed bullet descriptions of the identified violations. Exception to the one incident of noncompliance per facility inspected rule is when multiple enforcement actions [W/C or W/C/S] are provided in the PINC. PINCs with multiple enforcement action(s) [W/C; W/C/S] may dictate that multiple incidents of noncompliance are issued per facility to document severity levels of violations. Such cases will result in the issuance of one incident of noncompliance for the appropriate selected enforcement action with detailed bullet descriptions of the identified violations.

2. Issue one incident of noncompliance for each safety device inspected.

One (1) incident of noncompliance is issued for each safety device, component, well, etc., that is determined to be in violation of the regulations.

Should an immediate shut-in increase the risk to safety or pollution, a statement on the INC shall indicate when the shut-in is to take effect. In an after-the-fact situation where no correction is possible, a warning (W) INC will normally be issued, since a shut-in would serve no useful purpose. However, an after-the-fact INC that may result in Civil Penalty Review (CPR) recommendation should be issued with the appropriate shut-in enforcement action.

ACRONYMS USED

Enforcement Actions

W - Warning

C - Component Shut-in

S - Facility (Platform/Rig/Operation) Shut-in

Other Acronyms:

APD - Application for Permit to Drill (form MMS-123)

API - American Petroleum Institute

APM - Application for Permit to Modify (form MMS-124)

CFR - Code of Federal Regulations

DOCD - Development Operations Coordination Document

DOI - Department of the Interior

EOR - End of Operations Report

G&G - Geological and Geophysical

INC - Incident of Noncompliance

MAOP - Maximum Allowable Operating Pressure

MMS - Minerals Management Service

MODU - Mobile Offshore Drilling Unit
MPMS - Manual of Petroleum Standards
MPR - Maximum Production Rate
OCS - Outer Continental Shelf
PINC - Potential Incident of Noncompliance
POE - Plan of Exploration
ROW - Right-of-Way
SAC - Safety Analysis Checklist
SAFE - Safety Analysis Function Evaluation
TIMS - Technical Information Management System
TVD - True Vertical Depth

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GENERAL

OPERATIONS

G-801

ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS?

Authority: 30 CFR 250.101

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the lease stipulation.

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.

G-802

ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED APPLICATIONS?

Authority: 30 CFR 250.410

Enforcement Action: W/C/S

30 CFR 250.802

30 CFR 250.1202(a)(1)

30 CFR 250.1204(a)

30 CFR 250.513 (a)

30 CFR 250.613 (a)

30 CFR 250.1712

30 CFR 250.1725

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved application, i.e., APD's, SAFE and SAC charts, etc.

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 application(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 if the violation(s) of the application(s) poses an immediate danger to personnel, equipment, or the environment and it can be shut-in without affecting the overall safety of the facility.

Issue one facility shut-in (S) INC if a violation of the application poses an immediate danger to the entire facility, personnel, or the environment; and the specific piece of equipment or location cannot be shut-in without affecting the overall safety of the facility.

Note: Do not issue an INC when the operator's safety devices, systems, and equipment are installed and function in accordance with an approved "IN ERROR BY THE PRODUCTION ENGINEER" SAFE chart and Flow Diagram. Approvals made in error by MMS will be communicated to the operators by the production engineer.

INSPECTION COUNT/ INC COUNT:

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

G-803

ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH APPROVED PLANS?

Authority: 30 CFR 250.200
30 CFR 254.2

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., POE's, DOCD's, Oil Spill Response Plans.

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 plan audited.

ARCHAEOLOGICAL

G-808

DOES THE ARCHAEOLOGICAL REPORT SUGGEST THAT ARCHAEOLOGICAL RESOURCES MAY BE PRESENT AND IS THE LOCATION OF THE SITE OF ANY OPERATION LOCATED SO AS TO NOT ADVERSELY AFFECT THE AREA OF THE RESOURCE?

Authority: 30 CFR 250.194(a)(1)
30 CFR 250.194(c)
30 CFR 250.1010(c)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., EP's, DOCD's, DPP, etc.

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 audit.

G-809

DOES THE LESSEE'S DISCOVERY OF ANY ARCHAEOLOGICAL RESOURCES IN THE LEASE AREA IMMEDIATELY RESULT IN HALTING OPERATIONS AND TAKING STEPS TO PROTECT SIGNIFICANT RESOURCES AND REPORTING THE DISCOVERY TO THE REGIONAL DIRECTOR?

Authority: 30 CFR 250.194(a)(1)
30 CFR 250.194(c)
30 CFR 250.1010(c)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the approved plans, e.g., EP's, DOCD's, DPP, etc.

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 audit.

RECORDS

G-811

IS REQUIRED PAPERWORK SUBMITTED IN THE TIME FRAME REQUIRED FOR ALL ACTIVITIES OR OPERATIONS AS SPECIFIED BY REGULATIONS?

Authority: 30 CFR 250.465

Enforcement Action: W/C

30 CFR 250.468

30 CFR 250.513(a)

30 CFR 250.613(a)

30 CFR 250.613(d)

30 CFR 250.1008

30 CFR 250.1202(c)(4)

30 CFR 250.1202(d)(5)

30 CFR 250.1202(f)(2)

30 CFR 250.1203(b)(8)

30 CFR 250.1203(b)(9)

30 CFR 250.1721(g)

30 CFR 251.4

30CFR 251.8(2)

INSPECTION PROCEDURE:

Verify paperwork has been submitted in the time frame required, i.e., APM, drilling reports, EOR, etc.

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 report audited.

PLATFORMS AND STRUCTURES

G-821 **HAVE THE PLATFORMS AND STRUCTURES BEEN DESIGNED, FABRICATED, INSTALLED, USED, INSPECTED, AND MAINTAINED TO ENSURE ITS STRUCTURAL INTEGRITY FOR SAFE CONDUCT OF DRILLING, WORKOVER, AND PRODUCTION OPERATIONS?**

Authority: 30 CFR 250.900(a)
30 CFR 250.900(b)

Enforcement Action: W

Note: Use this PINC where no other PINC for platforms and structures applies.

INSPECTION PROCEDURE:

Verify that the platforms and structures have been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity for safe conduct of drilling, workover, and production operations.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a facility if the platforms and structures have not been designed, fabricated, installed, used, inspected, and maintained to ensure their structural integrity.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per platform and structure audited.

G-822 **DOES THE LESSEE COMPILE, RETAIN, AND MAKE AVAILABLE PLATFORM STRUCTURAL RECORDS FOR THE LIFE OF THE PLATFORM, INCLUDING THE RESULTS OF PLATFORM STRUCTURAL INSPECTIONS?**

Authority: 30 CFR 250.912
30 CFR 250.914

Enforcement Action: W

INSPECTION PROCEDURE:

1. Review operator records to verify that the records for each platform are available.
2. Verify that the lessee maintains for the functional life of the platform the following records:
 - A. The as-built structural drawings.
 - B. The design assumptions and analyses.
 - C. A summary of the nondestructive examination records.
 - D. The inspection results from platform inspections.
3. Verify that the records for each inspection include:
 - A. The type of inspection employed (e.g., visual, magnetic particle, or ultrasonic testing).
 - B. A summary of the testing results.
 - C. What repairs, if any, were needed.
 - D. What repairs were made.
 - E. The overall structural condition of the platform.
4. Verify that the platform has been inspected at intervals required by MMS.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a facility if operator records:

1. Are not available.
2. Do not contain all of the required information.
3. Do not indicate that the inspections were performed at the required frequency.

INSPECTION COUNT/ INC COUNT:

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

G-823 **HAS THE OPERATOR PERFORMED THE REQUIRED STRUCTURAL SURVEYS FOR THE PLATFORM AND SUBMITTED A REPORT OF THE RESULTS ANNUALLY BY NOVEMBER 1 TO THE REGIONAL SUPERVISOR?**

Authority: 30 CFR 250.912

Enforcement Action: W

INSPECTION PROCEDURE:

Review records in TIMS and documentation submitted by operator and others to determine if the platform is in compliance with the structural survey inspection and reporting requirements.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a records audit of a facility if records indicate that the existing platform was not in compliance with the structural survey inspection and reporting requirements.

(New Office PINC proposed by Office of Structural & Technical Support.)

INSPECTION COUNT/ INC COUNT:

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

BONDING

G-831

DOES THE LESSEE MAINTAIN THE APPROPRIATE BOND REQUIRED?

Authority: 30 CFR 256.52

Enforcement Action: W/S

30 CFR 256.53

30 CFR 256.54

INSPECTION PROCEDURE:

1. Verify that the general bond complies with the levels of development on the lease.
2. Verify that the supplemental bond complies with the MMS requirements.
3. Verify, using Treasury Circular 570, that the Surety is capable of providing a bond for the dollar amount in question.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of bonding coverage if bonding requirements are not met.

Issue one facility shut-in (S) INC for one or more facilities on a lease if bonding requirements are not met within the time specified for correction.

INSPECTION COUNT/ INC COUNT:

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

G-832

IF A BOND LAPSES OR DECREASES IN VALUE DURING THE TERM OF THE REQUIRED FINANCIAL COVERAGE, HAS THE LESSEE PROVIDED ACCEPTABLE ALTERNATIVE FINANCIAL COVERAGE TO THE REGIONAL DIRECTOR?

Authority: 30 CFR 256.52(e)

Enforcement Action: W/S

30 CFR 256.55

30 CFR 256.56

30 CFR 256.57

INSPECTION PROCEDURE:

1. If the value of a bond submitted as security to the MMS has decreased in value, verify the lessee has provided evidence of additional alternative financial security to the Regional Director within 6 months or such shorter period of time as the Regional Director may direct.
2. If a bond submitted as security to the MMS has lapsed during the required term of the coverage, verify that acceptable alternative financial security is promptly provided to the Regional Director.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of bonding coverage if acceptable alternative financial coverage was not provided, but has since been submitted.

Issue one facility shut-in (S) INC for one or more facilities covered by a required bond if acceptable alternative financial coverage was not provided within the specified time period to the Regional Director.

INSPECTION COUNT/ INC COUNT:

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

G-833

HAS THE LESSEE NOTIFIED THE REGIONAL DIRECTOR WITHIN 72 HOURS AFTER LEARNING THAT AN ACTION WAS FILED ALLEGING THAT THE LESSEE, THE SURETY, OR THE GUARANTOR PROVIDING REQUIRED FINANCIAL SECURITY ARE INSOLVENT OR BANKRUPT?

Authority: 30 CFR 256.55(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the Regional Director was notified within 72 hours after the lessee learned an action was filed alleging that the lessee, the surety, or the guarantor are bankrupt or insolvent.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of required financial coverage if the Regional Director was not notified as required.

INSPECTION COUNT/ INC COUNT:

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

TRAINING

- G-841 HAS A WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM BEEN ESTABLISHED AND IMPLEMENTED?**
Authority: 30 CFR 250.1503(a) **Enforcement Action:** S
INSPECTION PROCEDURE:
Verify that the lessee has established and implemented a training program.
IF NONCOMPLIANCE EXISTS:
Issue one facility shut-in (S) INC for an audit of a lessee's training program if the training program for well-control and production safety duties is not established and implemented.
Note: The one or more affected facilities of the lessee is the facility.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per training program audited.
- G-842 CAN THE LESSEE EXPLAIN ITS OVERALL WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAM AND PRODUCE EVIDENCE TO SUPPORT THE EXPLANATION DURING A TRAINING SYSTEM AUDIT CONDUCTED BY THE MMS OR ITS AUTHORIZED REPRESENTATIVE?**
Authority: 30 CFR 250.1507(a) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify during audit that the lessee can explain its overall training program and produce evidence to support the explanation.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for a training system audit if the lessee cannot explain its overall training program and produce evidence to support the explanation.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per training program audited.
- G-843 DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR TRAINING EMPLOYEES IN WELL-CONTROL OR PRODUCTION SAFETY PRACTICES AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?**
Authority: 30 CFR 250.1503(b)(1) **Enforcement Action:** W
30 CFR 250.1507(a)
INSPECTION PROCEDURE:
1.) Verify that lessee's training plan includes procedures for training employees in well-control and production safety practices.
2.) Verify that procedures are being followed by reviewing employee records.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for training employees in well-control or production safety practices or documentation fails to support that the procedures are being implemented.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per training plan audited.
- G-844 DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE TYPE, METHOD(S), LENGTH, FREQUENCY, AND CONTENT OF THE TRAINING FOR EMPLOYEES?**
Authority: 30 CFR 250.1503(b) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that lessee's training plan specifies the type, method(s), length, frequency, and content of the training for employees.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the type, method(s), length, frequency, and content of the training for employees.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per training plan audited.

G-845

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR ASSESSING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING NEEDS OF EMPLOYEES ON A PERIODIC BASIS AND IS THERE EVIDENCE THAT THE PROCEDURES ARE BEING FOLLOWED?

Authority: 30 CFR 250.1503(b)(4)
30 CFR 250.1507(a)

Enforcement Action: W

INSPECTION PROCEDURE:

- 1.) Verify that lessee's training plan includes procedures for assessing the training needs of employees on a periodic basis.
- 2.) Verify through records review that the procedures are being implemented.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for assessing the training needs of employees on a periodic basis or documentation fails to support that the procedures are being implemented.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-846

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR EVALUATING THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PROGRAMS OF CONTRACTORS AND IS THERE EVIDENCE THAT THE EVALUATIONS ARE BEING CONDUCTED AS PER THE PROCEDURES?

Authority: 30 CFR 250.1503(b)(2)
30 CFR 250.1507(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify

- 1.) Verify that lessee's training plan includes procedures for evaluating the training programs of contractors.
- 2.) Verify through records review that evaluations are being conducted as per the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for evaluating the training programs of contractors or documentation fails to indicate that the contractor evaluations are being conducted?

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-847

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR INTERNAL AUDITS AND IS THERE EVIDENCE THAT THE INTERNAL AUDITS ARE BEING CONDUCTED AS PER PROCEDURES?

Authority: 30 CFR 250.1503(b)(6)
30 CFR 250.1507(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify

- 1.) Verify that lessee's training plan includes procedures for internal audits.
- 2.) Verify through records review that the internal audits are being conducted as per the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to include procedures for internal audits or documentation fails to indicate that the internal audits are being conducted.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-848

DOES THE LESSEE PROVIDE A COPY OF ITS TRAINING PLAN WHEN REQUESTED BY THE MMS REGIONAL OR DISTRICT SUPERVISOR?

Authority: 30 CFR 250.1503(c)(2)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that a training plan is provided when requested by the MMS Regional or District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one facilities shut-in (S) INC for an audit of a lessee's training program if the lessee fails to provide the training plan when requested by the MMS Regional or District Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited..

G-849

DOES THE WELL-CONTROL AND PRODUCTION SAFETY TRAINING PLAN SPECIFY THE METHOD(S) OF VERIFYING EMPLOYEES' UNDERSTANDING AND PERFORMANCE?

Authority: 30 CFR 250.1503(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that lessee's training plan specifies the method(s) of verifying employees' understanding and performance.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan being reviewed fails to specify the method(s) of verifying employees' understanding and performance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-850

ARE PROCEDURES ESTABLISHED TO VERIFY ADEQUATE RETENTION OF THE KNOWLEDGE AND SKILLS THAT EMPLOYEES NEED TO PERFORM THEIR ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES AND IS THERE EVIDENCE INDICATING THAT THE KNOWLEDGE AND SKILLS ARE BEING VERIFIED?

Authority: 30 CFR 250.1506(b)

Enforcement Action: W

30 CFR 250.1507(a)

INSPECTION PROCEDURE:

1.) Verify that procedures are established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties.

2.) Verify through records review that procedures are being followed.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if procedures are not established to verify adequate retention of the knowledge and skills that employees need to perform their assigned well-control or production safety duties or documentation fails to indicate that procedures are being followed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

G-851

DOES THE LESSEE ENSURE (EITHER THROUGH THE CONTRACTOR EVALUATION OR OTHER METHOD THAT THE CONTRACTOR'S TRAINING PROGRAM PROVIDE FOR PERIODIC TRAINING AND VERIFICATION OF WELL-CONTROL OR PRODUCTION SAFETY KNOWLEDGE AND SKILLS?

Authority: 30 CFR 250.1506(c)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the lessee has ensured that contractor's training program provides for periodic training and verification of well-control or production safety knowledge and skills.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the lessee has not insured either through the contractor evaluation or other method that the contractor's training plan if contractor's training program does not provide for periodic training and verification of well-control or production safety knowledge and skills.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

G-852

DOES THE TRAINING PLAN INCLUDE PROCEDURES FOR VERIFYING THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL ENGAGED IN WELL-CONTROL AND PRODUCTION SAFETY OPERATIONS CAN PERFORM THEIR ASSIGNED DUTIES AND IS THERE EVIDENCE THAT ALL EMPLOYEES AND CONTRACTOR PERSONNEL HAVE BEEN VERIFIED IN ACCORDANCE WITH THE PROCEDURES?

Authority: 30 CFR 250.1503(b)(3)

Enforcement Action: W

30 CFR 250.1507(a)

INSPECTION PROCEDURE:

Verify

1.) Verify that the lessee's training plan includes procedures to verify that employees and contractor personnel can perform their assigned well-control and production safety duties.

2.) Verify through records review that all employees and contractor personnel have been verified in accordance with the procedures.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform well-control and production safety operations, can perform their assigned duties or documentation does not indicate that the verification procedures are being followed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not include procedures to verify that employees and contractor personnel, required to perform well-control and production safety operations, can perform their assigned duties.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-853

ARE ALTERNATIVE WELL-CONTROL AND PRODUCTION SAFETY TRAINING METHODS CONDUCTED IN ACCORDANCE WITH, AND MEET, THE OBJECTIVES OF THE TRAINING PLAN?

Authority: 30 CFR 250.1503(a)

Enforcement Action: W

30 CFR 250.1504

Note: Alternative methods may include computer-based learning, films, or their equivalent. This type of training should be reinforced by appropriate demonstrations and hands-on training.

INSPECTION PROCEDURE:

Verify that alternative methods conducted are in accordance with, and meet, the objectives of the training plan.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if alternative training methods conducted are not in accordance with, and meet, the objectives of the training plan.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-854

IS WELL-CONTROL AND PRODUCTION SAFETY TRAINING FOR EMPLOYEES PROVIDED FROM SOURCES THAT MEET THE REQUIREMENTS OF THE TRAINING PLAN?

Authority: 30 CFR 250.1503(a)

Enforcement Action: W

30 CFR 250.1505

INSPECTION PROCEDURE:

Verify that training for employees is from sources that meet the requirements of the training plan.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if training for employees is not provided from sources that meet the requirements of the training plan.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

G-855

IS PERIODIC TRAINING PROVIDED TO ENSURE THAT EMPLOYEES MAINTAIN UNDERSTANDING OF, AND COMPETENCY IN, WELL-CONTROL OR PRODUCTION SAFETY PRACTICES?

Authority: 30 CFR 250.1506(a)
INSPECTION PROCEDURE:

Enforcement Action: W/C

1. Verify that the training plan provides for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.
2. Verify through record reviews that periodic training is conducted to ensure that employees maintain understanding of and competency in, well-control or production safety practices.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if the training plan does not provide for periodic training to ensure that employees maintain understanding of, and competency in, well-control or production safety practices.

Issue one component shut-in (C) INC for each employee that has not received is not provided periodic training (in accordance with plan) to ensure that the employee maintains understanding of, and competency in, well-control or production safety practices.

Note: The employee is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited.

G-856

DOES EACH EMPLOYEE OR CONTRACT PERSONNEL UNDERSTAND AND PERFORM THE ASSIGNED WELL-CONTROL OR PRODUCTION SAFETY DUTIES?

Authority: 30 CFR 250.1503(a)
30 CFR 250.1503(b)(3)
30 CFR 250.1504
30 CFR 250.1506(b)
30 CFR 250.1507(c)
30 CFR 250.1507(d)

Enforcement Action: W/C

INSPECTION PROCEDURE:

- 1.) Verify that lessee's training plan provides a process to ensure that employees and contract personnel understand and can perform their assigned well-control or production safety duties.
- 2.) Verify (either through written, hands-on, or oral testing) that employees understand and can perform their assigned well-control or production safety duties.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more employees/contract personnel if the training plan fails to provide a process to ensure that employees understand and can perform assigned well-control or production safety duties. Issue one component shut-in (C) INC for one or more employees/contract personnel that fail to demonstrate either through written, hands-on, or oral testing, their ability to perform the assigned well-control or production duties.

Note: The employee/contract personnel is the component.

INSPECTION COUNT/INC COUNT:

Enter one item checked/issue on INC per training plan audited.

G-857

DOES THE LESSEE ALLOW MMS OR ITS AUTHORIZED REPRESENTATIVE TO ADMINISTER WRITTEN, ORAL, HANDS-ON WELL-CONTROL OR PRODUCTION SAFETY TESTS AT THE WORK SITE OR ONSHORE LOCATION?

Authority: 30 CFR 250.1507(c)
30 CFR 250.1508(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that MMS or its authorized representative is allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program if MMS or it's authorized representative is not allowed to administer written, oral, or hands-on tests at the lessee's work site or onshore location.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited..

PERSONNEL INVOLVED IN WELL-CONTROL OR PRODUCTION SAFETY OPERATIONS FOR THE PAST FIVE YEARS WHEN REQUESTED BY THE MMS REGIONAL OR DISTRICT SUPERVISOR?

Authority: 30 CFR 250.1503(c)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that training documentation was provided when requested by the MMS Regional or District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of a lessee's training program for each request if the lessee failed to provide the training documentation when requested by the MMS Regional or District Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

PRODUCTION REPORTING

G-881

HAS THE OPERATOR SUBMITTED A REPORT TO THE DISTRICT SUPERVISOR OF INITIAL PRODUCTION FROM A LEASE?

Authority: 30 CFR 250.180(a)(1)
30 CFR 250.180(i)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify from records that initial production has started and that the District Supervisor has been notified of initial production from each lease within 5 days of initial production.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the District Supervisor has not been notified within 5 days after initial production has been initiated on the lease.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease.

G-882

HAS THE OPERATOR SUBMITTED A REPORT TO THE DISTRICT SUPERVISOR OF CESSATION OF PRODUCTION ON A LEASE?

Authority: 30 CFR 250.180(a)(1)
30 CFR 250.180(i)(2)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify from records that when production has ceased from a lease, the District Supervisor has been notified within 15 days after the first full month of zero production.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the District Supervisor has not been notified within 15 days after the first full month of zero production on the lease.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per lease.

ACCIDENT REPORTING

G-891

HAS THE DISTRICT MANAGER BEEN NOTIFIED WITH A WRITTEN REPORT WITHIN 15 DAYS OF THE INCIDENT INVOLVING ALL: FATALITIES, INJURIES INVOLVING LOST TIME AND EVACUATION, LOSS OF WELL CONTROL, FIRES, EXPLOSIONS, H₂S RELEASES AS DEFINED BY 30 CFR 250.490(1), COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS, SAFETY SYSTEM DAMAGES, GAS RELEASES THAT INITIATE EQUIPMENT OR PROCESS SHUTDOWN, ALL INCIDENTS THAT RESULT IN DAMAGES GREATER THAT \$25,000, AND ALL INCIDENTS THAT REQUIRE PERSONNEL TO MUSTER FOR EVACUATION?

**Authority: 30 CFR 250.187
30 CFR 250.188
30 CFR 250.190
30 CFR 250.191
30 CFR 250.490**

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the DM 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 250. 187,188,190,191,490 have been included and submitted to the DM 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 District Manager has not been notified by the lessee as required.

INSPECTION COUNT/ INC COUNT:

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

G-892

HAS THE DISTRICT MANGER BEEN VERBALLY NOTIFIED COMMUNICATION IMMEDIATELY FOLLOWING INCIDENTS INVOLVING ALL: FATALITIES, INJURIES REQUIRING EVACUATION, LOSS OF WELL CONTROL, FIRES, EXPLOSIONS,H₂S RELEASES AS DEFINED IN 30 CFR 250.490(1), COLLISIONS, STRUCTURAL DAMAGES, CRANE INCIDENTS AND SAFETY SYSTEM DAMAGES CONNECTED WITH ANY OPERATIONS OR ACTIVITIES ON A LEASE, RIGHT-OF-USE AND EASEMENT, PIPELINE RIGHT-OF-WAY, OR OTHER PERMIT ISSUED BY MMS?

**Authority: 30 CFR 250.187
30 CFR 250.188
30 CFR 250.189
30 CFR 250.191
30 CFR 250.490**

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the District Manager 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 250.187,188,189,191,490 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 District Manager 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.

SAND & GRAVEL

G-900

ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS?

Authority: 30 CFR 282.14

Enforcement Action: W/C

INSPECTION PROCEDURE:

Verify that projects are being conducted in accordance with the lease stipulations.

IF NONCOMPLIANCE EXISTS:

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

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

INSPECTION COUNT/ INC COUNT:

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

ENVIRONMENTAL PROTECTION

OIL SPILL RESPONSE PLANS

E-801

IS THE FACILITY OR PIPELINE COVERED BY AN APPROVED OIL SPILL RESPONSE PLAN OR A CERTIFICATION OF CAPABILITY TO RESPOND TO A WORST CASE DISCHARGE?

Authority:

254.2(a)

254.1(a)

Enforcem

254.2(b)

INSPECTION PROCEDURE

Verify that the facility or pipeline is covered by an approved Oil Spill Response Plan, or that a certification of capability to respond to a worse case discharge has been submitted to the Regional Supervisor.

IF NONCOMPLIANCE EXISTS

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

1. The facility or pipeline is not covered by an approved Oil Spill Response Plan, or a certification of capability to respond to a worse case discharge has not been submitted to the Regional Supervisor.

INSPECTION COUNT/ INC COUNT:

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

HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED OF RESULTS OF AN OIL SPILL PLAN REVIEW AND/OR RECEIVED REQUIRED REVISIONS TO THE OIL SPILL RESPONSE PLAN?

Authority: 254.2(a)

Enforcement Action: W/S

254.30(a)

254.30(b)

254.30(c)

254.30(d)

254.30(e)

INSPECTION PROCEDURE

Verify that the Oil Spill Response Plan:

1. Has been reviewed within two years from the last plan submittal date and that:

- a) Necessary revisions were submitted to the Regional Supervisor or;
- b) A finding of “no changes required” was submitted in writing to the Regional Supervisor.

2. Revisions have been submitted within 15 days whenever:

- a. A change occurs which significantly reduces the response capabilities.
- b. A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored, or transported at the facility.
- c. A change in the name(s) or capabilities of the oil spill removal organization cited in the plan.
- d. A significant change is made to the Area Contingency Plan(s).

3. Has been revised to include changes requested by the Regional Supervisor.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. The Regional Supervisor has not been notified of the biennial Oil Spill Response Plan review through either the receipt of plan revisions or correspondence stating that no changes to the plan were required.

2. Revisions to the Oil Spill Response Plan have not been submitted to the Regional Supervisor for approval within 15 days after significant changes which affect the plan have occurred.

3. Changes requested by the Regional Supervisor have not been made.

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

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance within the timeframe as specified in the Warning INC.

INSPECTION COUNT/ INC COUNT:

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

TRAINING

E-821

HAS THE SPILL RESPONSE OPERATING TEAM COMPLETED REQUIRED TRAINING, AND ARE RECORDS BEING MAINTAINED?

Authority: 254.2(a)

Enforcement Action: W/S

254.5(a)

254.40

254.41(a)

254.41(d)

254.42(e)

INSPECTION PROCEDURE

Review the training records for members of the Spill Response Operating Team listed in the Oil Spill Response Plan to verify that:

1. Team members have attended annual hands-on training, including deployment and operation of the response equipment to be used.
2. Supervisory personnel have attended annual training in directing the deployment and use of the response equipment.
3. Records are being maintained for at least two years and are located at the site designated in the plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Members of the Spill Response Operating Team or Supervisory Personnel have not timely received the required training.
2. Training records are not being maintained as required.

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

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

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

E-822

HAS THE SPILL MANAGEMENT TEAM COMPLETED REQUIRED TRAINING, AND ARE RECORDS BEING MAINTAINED?

Authority: 254.2(a)

Enforcement Action: W/S

254.5(a)

254.40

254.41(b)

254.41(c)

254.41(d)

254.42(e)

INSPECTION PROCEDURE

Review the training records of members of the Spill Management Team listed in the Oil Spill Response Plan to verify that:

1. Team members have attended annual training on locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment; spill reporting procedures; oil-spill trajectory analysis and predicting spill movement; any other responsibilities the spill management team may have.
2. Records are being maintained and are located at the site designated in the plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Members of the Spill Management Team have not timely received the required training.
2. Training records are not being maintained as required.

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

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training program audited .

EXERCISES

E-831

WAS THE REGIONAL SUPERVISOR INFORMED 30 DAYS IN ADVANCE OF THE DATE OF THE SCHEDULED THE EXERCISE?

Authority: 254.2(a)
254.5(a)
254.42(f)

Enforcement Action: W/S

INSPECTION PROCEDURE

Verify that the Regional Supervisor was informed at least 30 days before the date of the following scheduled exercises:

1. Annual spill management team tabletop.
2. Annual deployment exercise of response equipment identified in the plan and that is staged at onshore locations.
3. Semiannual deployment exercise of any response equipment which the Regional Supervisor requires the operator to maintain at the facility or on dedicated vessels.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. The Regional Supervisor was not notified at least 30 days in advance of the scheduled exercise.

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

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

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

E-832

ARE EXERCISES FOR ALL PARTS OF THE OIL SPILL RESPONSE PLAN CONDUCTED AT LEAST ONCE EVERY THREE YEARS, AND ARE RECORDS BEING MAINTAINED?

Authority: 254.2(a)
254.5(a)
254.40
254.42(a)
254.42(b)
254.42(c)
254.42(d)
254.42(e)

Enforcement Action: W/S

INSPECTION PROCEDURE

Review records to determine if:

1. The following annual exercises were conducted.
 - a. Spill Management Team table-top.
 - b. Response equipment deployment.
 - c. Manned facility notification.
2. A semi-annual equipment deployment exercise for equipment on dedicated vessels or that required at a facility by the Regional Supervisor.
3. All parts of the entire Oil Spill Response Plan have been exercised during the triennial period.
4. Records are being maintained for at least the three-year cycle and are located at the site designated in the plan.

Note: Individual parts of the Oil Spill Response Plan may be exercised separately over the 3-year period.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Exercises were not conducted within required time frames.
2. All parts of the Oil Spill Response Plan were not exercised at least once every 3years.
3. Records are not being maintained.

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

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

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

DURING AN UNANNOUNCED OIL SPILL DRILL, DID THE OPERATOR SUCCESSFULLY DEMONSTRATE THE ABILITY TO IMMEDIATELY CARRY OUT PROVISIONS OF THE APPROVED OIL SPILL RESPONSE PLAN?

Authority: 250.132(a)

Enforcement Action: W/S

- 250.132(b)
- 254.2(a)
- 254.41(a)
- 254.41(b)
- 254.41(c)
- 254.41(d)
- 254.42(g)
- 254.42(h)

INSPECTION PROCEDURE

While conducting an on-site unannounced oil spill drill, use performance criterion from the National Preparedness for Response Exercise Program and evaluate the actions of the members of the spill management team, spill response operating team, and qualified individual; assess knowledge of the approved Oil Spill Response Plan; and compare actions taken during the drill to those listed in the approved Oil Spill Response Plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if during the exercise the operator:

1. Did not take immediate action to abate, control, contain, and remove the simulated oil discharge.
2. Did not immediately carry out the provisions of the approved Oil Spill Response Plan.
3. Failed to take all appropriate actions necessary to immediately abate the source of the simulated spill and remove any spills of oil.
4. Created conditions that would have posed unreasonable risk to the public health, life, property, aquatic life, wildlife, recreation, navigation, commercial fishing, or other uses of the ocean.

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

1. A warning (W) INC has been previously issued; the operator has not responded to MMS requirements to correct the area of non-compliance; or the violation posed an immediate or imminent threat to life, property, or the built or natural environments.
2. In two successive unannounced drills, a warning (W) INC was issued after evaluation of the first drill and analysis of the second drill would have resulted in issuance of a warning (W) INC.

INSPECTION COUNT/ INC COUNT:

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

OIL SPILL REPORTS

E-841

ARE OBSERVED OIL DISCHARGES REPORTED BY THE OPERATOR?

Authority: 254.2(a)

Enforcement Action: W/S

254.46(a)

254.46(b)

254.46(c)

INSPECTION PROCEDURE

Verify that all oil discharges:

1. Regardless of origin or size, were immediately reported to the National Response Center.
2. Of one barrel or more, from the operator's facility or pipeline, were orally reported without delay to the Regional Supervisor and that a written report was submitted within 15 calendar days after the discharge had stopped.
3. From another offshore facility were immediately reported to the Regional Supervisor and the responsible party.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if:

1. Records indicate that an oil discharge was observed and not reported or not reported timely as required.
2. A written follow-up report for an oil spill of one barrel or more from the facility was not submitted to the Regional Supervisor within 15 days after the spillage has been stopped.
3. The operator failed to report spills of one barrel or more to the Regional Supervisor without delay.

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

1. A warning (W) INC has been previously issued and the operator has not responded to MMS requirements to correct the area of non-compliance.

INSPECTION COUNT/ INC COUNT:

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

DURING AND FOLLOWING AN OIL DISCHARGE FROM A FACILITY AND/OR PIPELINE, WERE IMMEDIATE RESPONSE ACTIONS TAKEN AND WERE THEY CONSISTENT WITH THE APPROVED OIL SPILL RESPONSE PLAN?

Authority: 250.132(a)
 250.132(b)
 250.107(b)
 250.300(a)(1)
 254.2(a)
 254.5(a)
 254.5(c)
 254.23(a)
 254.23(b)
 254.23(c)
 254.23(d)
 254.23(e)
 254.23(f)
 254.23(g)
 254.40

Enforcement Action: W/S

INSPECTION PROCEDURE

After an oil discharge has occurred, review MMS and responsible party-generated spill response reports, discuss response actions with representatives of the Federal On-Scene coordinator, obtain information from oil spill removal organizations, and obtain additional data from the responsible party and/or members of the Incident Command Team, as required. If deployed to the Incident Command Post during the response, prepare detailed observations of real-time response activities. Compare collected data to that contained in the approved Oil Spill Response Plan.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC if the operator:

1. Did not take immediate action to abate, control, contain, and remove the oil discharge.
2. Did not immediately carry out the provisions of the approved Oil Spill Response Plan.
3. Failed to take all appropriate actions necessary to immediately abate the source of the spill and remove any spills of oil.
4. Created conditions that posed unreasonable risk to the public health, life, property, aquatic life, wildlife, recreation, navigation, commercial fishing, or other uses of the ocean.

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

1. A warning (W) INC has been previously issued; the operator has not timely responded to MMS requirements to correct the area of non-compliance; or the violation resulted in damage to or posed an immediate or imminent threat to life, property, or the built or natural environments.

INSPECTION COUNT/ INC COUNT:

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

DRILLING

PLAN APPROVAL

- D-801** **HAS WRITTEN APPROVAL TO DRILL, SIDETRACK, BYPASS, OR DEEPEN A WELL BEEN RECEIVED?**
Authority: 30 CFR 250.410 **Enforcement Action:** C
INSPECTION PROCEDURE:
Verify that approval to drill, sidetrack, or deepen a well was received from the District Supervisor.
IF NONCOMPLIANCE EXISTS:
Issue one component shut-in (C) INC for an audit of a drilling operation if drilling, sidetracking, bypassing, or deepening approval has not been received.
Note: The well is the component.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.
- D-802** **DOES THE LESSEE HAVE WRITTEN OR ORAL APPROVAL TO CHANGE PLANS, MAKE CHANGES IN MAJOR DRILLING EQUIPMENT OR PLUG BACK A WELL?**
Authority: 30 CFR 250.465(a)(1) **Enforcement Action:** C
INSPECTION PROCEDURE:
Verify that any changes from the approved plans have been received and approved by the District Supervisor.
IF NONCOMPLIANCE EXISTS:
Issue one component shut-in (C) INC for an audit of a drilling operation if the records indicate that approval has not been received for any changes from the approved plans.
Note: The well is the component.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.
- D-803** **IS THE DISTRICT SUPERVISOR GIVEN AT LEAST 24 HOURS NOTICE BEFORE STARTING A WELL TEST?**
Authority: 30 CFR 250.460(b) **Enforcement Action:** W
Note: For a well test to be conducted, it must be included in the projected plans for the test in the APD (form MMS-123) or in the APM (form MMS-124).
INSPECTION PROCEDURE:
Verify that the District Supervisor was notified as required.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a drilling operation if the District Supervisor was not notified as required before the start of a well test.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

CASING PROGRAM

- D-821** **IS CASING SET AS APPROVED?**
Authority: 30 CFR 250.420 **Enforcement Action:** W
INSPECTION PROCEDURE:
Compare APD approved proposed casing setting depths to on-site records of actual casing setting depths for all strings of casing set.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a well's casing setting depths if the casing was not set as approved in the APD.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.
- D-822** **IF THE CASING SETTING DEPTHS ARE MORE THAN 100 FEET TVD FROM THE APPROVED APD, HAS THE CHANGE BEEN APPROVED?**
Authority: 30 CFR 250.428(b) **Enforcement Action:** W
INSPECTION PROCEDURE:
Inspect records to verify that casings are set as approved by the District Supervisor.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a drilling operation if the casing was set deeper without approval.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

WELL CONTROL

- D-831** **ARE DRILLING OPERATIONS SUSPENDED WHEN THE SAFE MARGIN, AS APPROVED IN THE APD, BETWEEN THE DRILLING FLUID WEIGHT IN USE AND THE EQUIVALENT DRILLING FLUID WEIGHT AT THE CASING SHOE IS NOT MAINTAINED?**
Authority: 30 CFR 250.427(b) **Enforcement Action:** W
INSPECTION PROCEDURE:
Inspect the records to determine if the drilling fluid weight is within a safe margin of the equivalent drilling fluid weight. A safe margin is to be approved by the District Supervisor.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for an audit of a drilling operation if records indicate the safe margin has not been maintained.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per well audited.

RIG MOVEMENT

D-841

IS THE MOVEMENT OF ALL DRILLING UNITS ON AND OFF LOCATION REPORTED TO THE DISTRICT SUPERVISOR 24 HOURS PRIOR TO THE MOVEMENT, INCLUDING THE RIG NAME, LEASE NUMBER, WELL NUMBER, AND THE EXPECTED TIME OF ARRIVAL OR DEPARTURE?

**Authority: 30 CFR 250.403(a)
30 CFR 250.403(b)**

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the Operator has properly notified the District Supervisor of:

1. Arrival of the MODU on location.
2. Movement of a platform rig to a platform.
3. Movement of a platform rig to another slot.
4. Movement of a MODU to another slot.
5. Departure of a MODU from the location.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a drilling unit relocation if the proper notification of the drilling unit movement has not been submitted to the District Supervisor.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per drilling unit audited.

WELL-COMPLETIONS

C-801

HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT SUPERVISOR PRIOR TO CONDUCTING WELL-COMPLETION OPERATIONS?

Authority: 30 CFR 250.505

Enforcement Action: C

30 CFR 250.513(a)

INSPECTION PROCEDURE:

Verify from office records that prior written approval was received from the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for an audit of a well-completion operation if the operator does not have written approval to conduct well-completion operations.

Note: The well is the component.

INSPECTION COUNT/ INC COUNT:

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

WELL-WORKOVERS

W-801

**HAS THE LESSEE RECEIVED WRITTEN APPROVAL FROM THE DISTRICT SUPERVISOR
PRIOR TO CONDUCTING NON-ROUTINE WELL-WORKOVER OPERATIONS?**

Authority 30 CFR 250.601

Enforcement Action: C

30 CFR 250.605

30 CFR 250.613(a)

INSPECTION PROCEDURE:

Verify from office records that prior written approval was received from the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one component shut-in (C) INC for an audit of a well-workover operation if the operator does not have written approval to conduct non-routine well-workover operations.

Note: The well is the component.

INSPECTION COUNT/ INC COUNT:

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

DECOMMISSIONING

A-801

IS ISOLATION OF ZONES IN OPEN HOLE ACHIEVED?

Authority: 30 CFR 250.1715(a)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that cement plugs were placed to extend from a minimum of 100 feet below the bottom to 100 feet above the top of any oil, gas, or freshwater zones.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of well plugging operations if the cement plugs were not placed as required.

INSPECTION COUNT/ INC COUNT:

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

PRODUCTION

P-801

HAS APPROVAL BEEN RECEIVED WHEN THE OPERATOR HAS FLARED OR VENTED OIL-WELL GAS IN EXCESS OF 48 CONTINUOUS HOURS OR 144 CUMULATIVE HOURS DURING ANY MONTH?

Authority: 30 CFR 250.1105(a)(2)(i)

Enforcement Action: W/C

30 CFR 250.1105(a)(2)(ii)

INSPECTION PROCEDURE:

Review flaring or venting records to determine if continuous flaring or venting of oil-well gas has exceeded 48 hours of cumulative flaring or venting of oil well gas has exceeded 144 hours during any month without prior approval of the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of flaring or venting operations if flaring or venting has ceased but records indicate that 48 continuous hours or the 144 cumulative hours have been exceeded during a month without approval.

Issue one component shut-in (C) INC for one or more affected wells if flaring or venting is ongoing and records indicate that, in the current month, 48 continuous hours or the 144 cumulative hours have been exceeded without approval.

Note: The affected well is the component.

INSPECTION COUNT/ INC COUNT:

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

Note: Temporary cessation or suspension of pipeline operations shall not cause the ROW grant to expire.

INSPECTION PROCEDURE:

Review office file records, TIMS data, and any pertinent information received to determine if the pipeline is:

1. In operation;
2. Properly maintained; and
3. Used for the purpose for which the ROW was granted.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a pipeline audit if the pipeline is not used for the purpose for which the ROW was granted.

Issue one component shut-in (**C**) INC for a pipeline audit if the pipeline is not adequately maintained and poses an immediate danger to personnel, the environment, or a facility.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

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

TESTING

L-811

HAS THE REGIONAL SUPERVISOR BEEN NOTIFIED PRIOR TO A PRESSURE TEST ON A PIPELINE?

Authority: 30 CFR 250.1008(a)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to conducting a pressure test on a pipeline.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a pipeline audit if the lessee or the ROW holder did not notified the Regional Supervisor at least 48 hours prior to conducting a pressure test on a pipeline.

Issue one component shut-in (**C**) INC for a pipeline audit if a pressure test on the pipeline is currently being conducted and the lessee or the ROW holder has not notified the Regional Supervisor prior to commencing the operation.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

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

L-812

HAVE THE RESULTS AND CONCLUSIONS OF MEASUREMENTS OF PIPE-TO-ELECTROLYTE POTENTIAL MEASUREMENTS TAKEN ANNUALLY ON EACH DOI PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1000(e)(1)

Enforcement Action: C

30 CFR 250.1005(b)

30 CFR 250.1008(h)

INSPECTION PROCEDURE:

Verify that the results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually on each DOI pipeline were submitted to the Regional Supervisor before March of each year.

IF NONCOMPLIANCE EXISTS:

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

1. Results and conclusions of measurements of pipe-to-electrolyte potential measurements taken annually are not reported to the Regional Supervisor before March of each year.
2. Measurements of pipe-to-electrolyte potential measurements are not taken annually on a DOI pipeline.
1. Measurements of pipe-to-electrolyte potential measurements taken annually on a DOI pipeline are not analyzed.
2. After a review of the report, the Regional Supervisor cannot determine that continued activity 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 pipeline is the component.

INSPECTION COUNT/ INC COUNT:

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

L-813

HAVE PIPELINES THAT WERE INSTALLED, RELOCATED, UPRATED, OR REACTIVATED AFTER BEING OUT OF SERVICE FOR MORE THAN 1 YEAR, BEEN HYDROSTATICALLY TESTED WITH WATER TO A STABILIZED PRESSURE OF AT LEAST 1.25 TIMES THE MAOP FOR AT LEAST 8 HOURS?

Authority: 30 CFR 250.1003(b)(1)

Enforcement Action: W/C

30 CFR 250.1003(b)(3)

INSPECTION PROCEDURE:

1. Review the construction report to determine if a hydrostatic pressure test was performed on the pipeline for 8 hours and if the appropriate instruments (i.e., dead weight gauge, temperature recorder, and pressure recorder) were utilized.
2. Check dead weight test readings, temperature chart, and pressure chart.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline construction report audit if:

1. Any of the appropriate instruments were not utilized.
2. Collected data is not available.

Issue one component shut-in (C) INC for a pipeline construction audit if the pipeline was not tested for the required pressure and time period.

Note: The pipeline is the component.

INSPECTION COUNT/ INC COUNT:

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

REPAIR

- L-831 HAS THE LESSEE OR THE ROW HOLDER NOTIFIED THE REGIONAL SUPERVISOR PRIOR TO THE REPAIR OF A PIPELINE OR AS SOON AS PRACTICABLE THEREAFTER?**
Authority: 30 CFR 250.1008(e) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that the lessee or the ROW holder has notified the Regional Supervisor prior to the repair of a pipeline or as soon as practicable thereafter.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for a pipeline repair if the Regional Supervisor was not notified prior to the repair of a pipeline or as soon as practicable thereafter.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per pipeline audited.
- L-832 HAS A DETAILED REPORT ON THE REPAIR OF A PIPELINE OR PIPELINE COMPONENT BEEN SUBMITTED TO THE REGIONAL SUPERVISOR?**
Authority: 30 CFR 250.1000(e)(1) **Enforcement Action:** W/C
30 CFR 250.1008(e)
INSPECTION PROCEDURE:
1. Verify that a detailed report on the repair of a pipeline or pipeline component was submitted to the Regional Supervisor within 30 days after completion of the repairs.
2. Verify that the detailed report includes the required information.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for a pipeline or pipeline component repair if a detailed report on the repair does not include:
1. Description of the repairs;
2. Results of pressure test; and
3. Date the pipeline or pipeline component was returned to service.
Issue one component shut-in (C) INC for a pipeline or pipeline component repair if:
1. A detailed report on the repair was not submitted to the Regional Supervisor within 30 days after completion of the repairs.
2. After a review of the report, the Regional Supervisor cannot determine that continued activity 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 pipeline is the component.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per pipeline audited.
- L-833 HAS THE LESSEE SUBMITTED TO THE REGIONAL SUPERVISOR A COMPREHENSIVE WRITTEN REPORT OF ANY PIPELINE FAILURE ANALYZED?**
Authority: 30 CFR 250.1008(f) **Enforcement Action:** W
INSPECTION PROCEDURE:
Verify that a comprehensive written report of the analysis of any pipeline failure was submitted by the lessee to the Regional Supervisor when requested.
IF NONCOMPLIANCE EXISTS:
Issue one warning (W) INC for a pipeline failure audit if a comprehensive written report of the analysis of the pipeline failure was not submitted to the Regional Supervisor within the time frame specified.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per pipeline audited.

L-834

HAS A PLAN OF CORRECTIVE ACTION FOR OBSERVED DETRIMENTAL ENVIRONMENTAL FACTORS AFFECTING A PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR FOR APPROVAL?

Authority: 30 CFR 250.1000(e)(1)
30 CFR 250.1008(g)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Verify that a plan of corrective action of observed detrimental environmental factors affecting a pipeline was submitted to the Regional Supervisor for approval 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 Regional Supervisor 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 pipeline.
2. After a review of the report, the Regional Supervisor 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 pipeline is the component.

INSPECTION COUNT/ INC COUNT:

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

L-835

HAS A REPORT OF REMEDIAL ACTION TAKEN FOR DETRIMENTAL ENVIRONMENTAL FACTORS AFFECTING A PIPELINE BEEN SUBMITTED TO THE REGIONAL SUPERVISOR BY THE LESSEE OR ROW HOLDER?

Authority: 30 CFR 250.1000(e)(1)
30 CFR 250.1008(g)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Verify that a report of remedial action taken for detrimental environmental factors affecting a pipeline has been submitted to the Regional Supervisor within 30 days after completion of the remedial action.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a remedial action report audit if the report of remedial action taken for detrimental environmental factors affecting a pipeline was not submitted by the lessee or ROW holder to the Regional Supervisor within 30 calendar days after completion of the remedial action.

Issue one component shut-in (C) INC for a remedial action report audit if, after a review of the remedial action taken report, the Regional Supervisor cannot determine that continued activity 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 pipeline is the component.

INSPECTION COUNT/ INC COUNT:

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

DECOMMISSIONING

L-841

ARE PIPELINES OUT OF SERVICE FOR 5 YEARS, OR MORE, REMOVED IF THE PIPELINES ARE DETERMINED BY THE REGIONAL SUPERVISOR TO BE OBSTRUCTIONS?

Authority: 30 CFR 250.1006(b)(3)

Enforcement Action: W

30 CFR 250.1752

30 CFR 250.1754

INSPECTION PROCEDURE:

1. Verify that pipelines out of service for 5 years, or more, and that the Regional Supervisor determines constitute obstructions, are removed.
2. Verify that out-of-service pipelines that are removed are:
 - A. Pigged, unless the Regional Supervisor determines that pigging is not practical.
 - B. Flushed.
 - C. Removed in accordance with the removal procedures and schedule approved by the Regional Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a pipeline audit if the out-of-service pipelines are not removed as required.

INSPECTION COUNT/ INC COUNT:

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

COMPANY INFORMATION

L-851

HAS THE ROW HOLDER KEPT THE REGIONAL SUPERVISOR INFORMED OF THE COMPANY'S OFFICE ADDRESS, AND THE NAME AND ADDRESS OF OFFICER OR AGENT AUTHORIZED TO BE SERVED WITH PROCESS?

Authority: 30 CFR 250.1010(d)

Enforcement Action: W

INSPECTION PROCEDURE:

Review the MMS office file records to determine if the company information and the information for the officer or agent authorized to be served with process is current and correct.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each company file audit if the information is not correct or current.

INSPECTION COUNT/ INC COUNT:

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

**APPROVAL OF THIS REVISION BEFORE BYPASSING A RESERVOIR
REQUIRED BY DEVELOPMENT IN THE ORIGINAL CID?**

Authority: 296(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Review well and reservoir records and approved wellbore utility charts to determine whether a reservoir required for development by an approved CID has been bypassed without prior approval of a revision to the operators' CID.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if lessee did not receive an approval for revisions done to the existing Conservation Information Document from the MMS Regional Supervisor before bypassing a reservoir.

INSPECTION COUNT/ INC COUNT:

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

ENHANCED RECOVERY

R-811 HAS THE LESSEE RECEIVED APPROVAL FROM THE REGIONAL SUPERVISOR PRIOR TO INITIATING AN ENHANCED OIL AND GAS RECOVERY PROJECT OR OTHER TYPE OF INJECTION PROJECT?

Authority: 30 CFR 250.1107(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if the enhanced oil and gas recovery operations were approved by the Regional Supervisor prior to their initiation.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the enhanced oil and gas operations were initiated prior to receiving approval of the Regional Supervisor.

INSPECTION COUNT/ INC COUNT:

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

R-812 HAS THE LESSEE INITIATED ENHANCED OIL AND GAS RECOVERY OPERATIONS IN A TIMELY MANNER FOR COMPETITIVE AND NONCOMPETITIVE RESERVOIRS?

Authority: 30 CFR 250.1107(a)

30 CFR 250.118

30

CFR 251.4

30CFR 251.8(2)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records in TIMS and other documentation to determine if enhanced oil and gas recovery operations were initiated in a timely manner where such operations would result in an increased ultimate recovery of oil and gas.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the audit shows that enhanced oil and gas operations were not:

1. Initiated in a timely manner.
2. Based upon sound engineering and economic principles.

INSPECTION COUNT/ INC COUNT:

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

R-813

ARE REPORTS OF THE VOLUMES OF OIL, GAS, AND OTHER SUBSTANCES INJECTED INTO, PRODUCED FROM, OR REPRODUCED FROM A RESERVOIR SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?

Authority: 30 CFR 250.1107(c)

30 CFR 251.4

30 CFR 251.8(2)

30 CFR 250.118

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if reports of the volumes of oil, gas, and other substances injected into, produced from, or reproduced from a reservoir are submitted to the Regional Supervisor when requested.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a records audit if the required reports were not submitted to the Regional Supervisor when requested.

INSPECTION COUNT/ INC COUNT:

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

PRODUCTION RATE

R-821

HAS THE LESSEE CONDUCTED A WELL-FLOW POTENTIAL TEST WITHIN 30 DAYS AFTER THE DATE OF FIRST CONTINUOUS PRODUCTION ON A NEW, RECOMPLETED, OR REWORKED WELL COMPLETION?

Authority: 30 CFR 250.1102(b)(2)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if a well-flow potential test was completed within 30 days after the date of the first continuous production on a new, recompleted, or reworked well completion.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for the well test audit if the well-flow potential test was not completed within the required time frame.

INSPECTION COUNT/ INC COUNT:

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

R-822

HAS THE LESSEE SUBMITTED, FOR APPROVAL BY THE REGIONAL SUPERVISOR, A PROPOSED MPR WITH THE WELL-FLOW POTENTIAL TEST DATA, ON FORM MMS-126, WELL POTENTIAL TEST REPORT, WITHIN 15 CALENDAR DAYS AFTER THE END OF THE TEST PERIOD?

Authority: 30 CFR 250.1102(b)(2)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if a proposed MPR with the associated well-flow potential test data for each individual well completion was submitted for approval to the Regional Supervisor, within 15 days after the end of the well test period.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the proposed MPR with the associated well test data, on a Form MMS-126, has not been submitted for approval to the Regional Supervisor within the required time frame.

INSPECTION COUNT/ INC COUNT:

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

R-823

ARE THE WELLS AND RESERVOIRS BEING PRODUCED AT RATES THAT WILL DEplete THE HYDROCARBON RESOURCES IN A MANNER THAT MAXIMIZES ULTIMATE RECOVERY WITHOUT ADVERSELY AFFECTING CORRELATIVE RIGHTS?

Authority: 30 CFR 250.1101(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Review well and reservoir records to determine if hydrocarbon resources are produced in a manner that will maximize their ultimate recovery without adversely affecting correlative rights.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if the records show that:

1. Ultimately recovery of hydrocarbon resources will be significantly adversely impacted by current production operations.
2. Correlative rights are adversely affected.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per reservoir and/or well audited.

WELL TESTS

R-831

HAS THE LESSEE CONDUCTED AT LEAST ONE WELL TEST FOR PRODUCING OIL-WELL OR GAS-WELL COMPLETIONS, DURING A HALF-CALENDAR YEAR?

Authority: 30 CFR 250.1102(b)(3)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if the lessee has conducted at least one well test for producing oil-well or gas-well completions during a half-calendar year.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if at least one well test was not conducted for the completion during the current half-calendar year.

INSPECTION COUNT/ INC COUNT:

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

R-832

HAS THE LESSEE SUBMITTED WELL TEST RESULTS FOR EACH PRODUCING OIL-WELL AND GAS-WELL COMPLETION TO THE REGIONAL SUPERVISOR ON FORM MMS-128, SEMI-ANNUAL WELL TEST REPORT, WITHIN 45 DAYS AFTER THE TEST WAS CONDUCTED?

Authority: 30 CFR 250.1102(b)(3)

Enforcement Action: W

INSPECTION PROCEDURE:

Review records to determine if the lessee well test data was submitted well test results for each producing oil-well and gas-well completion to the Regional Supervisor within 45 calendar days after the test was conducted.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a production audit if well test results for a producing oil-well or gas-well completion has not been submitted to the Regional Supervisor within the required time frame.

INSPECTION COUNT/ INC COUNT:

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

R-833

HAS THE OPERATOR SUBMITTED A REQUEST FOR A SUSPENSION BEFORE THE END OF THE LEASE TERM, END OF THE 180-DAY PERIOD FOLLOWING THE LAST LEASE HOLDING ACTIVITY, OR END OF A CURRENT SUSPENSION?

Authority: 30 CFR 250.171

Enforcement Action: W

INSPECTION PROCEDURE:

Review the request, official documentation and other records to determine if the request was received before the end of the lease term, end of the 180-day period following the last lease holding activity, or end of a current suspension.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for a suspension request if the request was not received before the end of the lease term, end of the 180-day period following the last lease holding activity, or end of a current suspension.

INSPECTION COUNT/ INC COUNT:

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

PRODUCTION MEASUREMENT AND SITE SECURITY

CALIBRATION

M-801

IS EACH MECHANICAL DISPLACEMENT PROVER AND TANK PROVER CALIBRATED AT LEAST ONCE EVERY 5 YEARS AND A COPY OF THE CALIBRATION REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1202(f)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that each mechanical displacement prover and tank prover has been calibrated in accordance with API MPMS at least once every 5 years.
2. Verify that each calibration report has been submitted to the Regional Supervisor within 15 days after the calibration.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for the calibration verification of one or more provers if:

1. The calibration did not occur at least once every 5 years.
2. The calibration report was not submitted to the Regional Supervisor within 15 days after the calibration.

INSPECTION COUNT/ INC COUNT:

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

M-802

IS EACH OPERATING ROYALTY METER PROVED MONTHLY TO DETERMINE THE METER FACTOR AND IS THE PROVING REPORT SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1202(d)(3)

Enforcement Action: W/C

30 CFR 250.1202(d)(4)

30 CFR 250.1202(d)(5)

INSPECTION PROCEDURE:

1. Verify that each royalty meter is proved to determine the meter factor monthly, but not to exceed 42 days, unless another proving schedule has been approved by the Regional Supervisor.
2. Verify that a copy of each royalty meter proving report is submitted to the Regional Supervisor within 15 days after the end of the month.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a proving audit of one or more royalty meters if the current provings have exceeded the approved proving schedule.

Issue one component shut-in (C) INC for a proving audit of a royalty meter if the current proving report was not submitted to the Regional Supervisor within 15 days after the end of the month.

Note: The royalty meter is the component.

INSPECTION COUNT/ INC COUNT:

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

M-803

IS THE RUN TICKET FOR EACH ROYALTY METER AND ROYALTY TANK COMPLETE, WAS IT PULLED WHEN REQUIRED, AND WAS IT SUBMITTED TO THE REGIONAL SUPERVISOR?

Authority: 30 CFR 250.1202(c)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Review the royalty meter or royalty tank run tickets to verify that they clearly identify all observed data, all correction factors, on/off seal numbers (royalty tanks only), and the net standard volume.
2. Verify that a run ticket was pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.
3. Verify that a copy of each run ticket is submitted to the Regional Supervisor within 15 days after the end of the month.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a run ticket audit of one or more royalty meter and royalty tank if:

1. The current run ticket does not clearly identify all observed data, all correction factors, on/off seal numbers (royalty tank only), and the net standard volume.
2. The current run ticket was not pulled at the beginning of the month and immediately after establishing the monthly meter factor or a malfunction meter factor.

Issue one component shut-in (C) INC for a run ticket audit of a royalty meter or royalty tank if the current run ticket was not submitted to the Regional Supervisor within 15 days after the end of the month.

Note: The royalty meter or the royalty tank is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per meter or tank audited.

LIQUID ROYALTY METER

M-821

ARE LIQUID HYDROCARBON ROYALTY METERS TAKEN OUT OF SERVICE, REPAIRED OR REPLACED, AND REPROVEN IF THE DIFFERENCE BETWEEN THE METER FACTOR AND THE PREVIOUS METER FACTOR EXCEEDS 0.0025?

Authority: 30 CFR 250.1202(i)(1)

Enforcement Action: W

INSPECTION PROCEDURE:

1. If a malfunction occurs:
 - A. Ensure that the meter remains out of service until the malfunction is corrected.
 - B. Ensure that the average of the malfunction factor and the previous factor is applied to the production measured through the meter between the date of the previous factor and the date of the malfunction factor.
 - C. Ensure that proving reports indicate that a malfunction occurred and show all appropriate remarks regarding subsequent repairs or adjustments.

Note: If A through C above is accomplished, an INC is not warranted.

2. Check proving reports for previous meter malfunctions.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a proving report audit if the proving report indicates that:

1. A previous meter malfunction occurred, the meter was taken out of service, repaired or replaced, and reproved; but information as to production averaging and meter repair or replacement is not available.
2. If proving reports indicate that a previous meter malfunction occurred and the meter was not taken out of service, repaired or replaced, and reproved.

INSPECTION COUNT/ INC COUNT:

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

GAS ROYALTY METER

M-831

ARE GAS VOLUME AND QUALITY STATEMENT DISPOSITIONS ON GAS ROYALTY METERS SUBMITTED TO THE REGIONAL SUPERVISOR WHEN REQUESTED?

Authority: 30 CFR 250.1203(b)(6)

Enforcement Action: W/C

30 CFR 250.1203(b)(7)

30 CFR 250.1203(b)(8)

30 CFR 250.1203(b)(9)

INSPECTION PROCEDURE:

1. Verify that the gas volume and quality statements and additional information were submitted when requested.
3. Verify that the gas volume and quality statements clearly identify all required data.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a gas volume audit of one or more gas royalty meters if the gas volume and quality statements and additional information do not clearly identify all required data.

Issue one component shut-in (C) INC for a gas volume audit of a gas royalty meter if the requested gas volume and quality statements and additional information requested by the Regional Supervisor are not submitted within the time frame specified.

Note: The gas royalty meter is the component.

INSPECTION COUNT/ INC COUNT:

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

DATA

O-811

ARE REQUIRED GEOLOGICAL AND GEOPHYSICAL DATA AND INFORMATION SUBMITTED TO MMS WITHIN THE TIME FRAME SPECIFIED BY REGULATION AND PERMIT?

Authority: 30 CFR 251.1
30 CFR 251.10
30 CFR 251.11
30 CFR 251.12

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that required data and information are submitted in the timeframe required by regulations and a G&G permit.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a G&G activity audit if the G&G data and information has not been submitted as specified by regulation and permit.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per G&G activity audited.

RENEWABLE ENERGY

GENERAL PROVISIONS

T-800

ARE OPERATIONS CONDUCTED IN ACCORDANCE WITH LEASE STIPULATIONS?

Authority: 30 CFR 285.100

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that operations are being conducted in accordance with the lease stipulation.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when the violation of the stipulation 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 the violation of the stipulation poses an immediate danger to personnel, equipment, or the environment and it can be shut-in without affecting the overall safety of the facility.

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

T-801

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-802

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.

COMPANY INFORMATION

T-803 HAS THE LESSEE NOTIFIED MMS INFORMED OF THE COMPANY’S MERGER, NAME CHANGE, OR CHANGE OF BUSINESS FORM?

Authority: 30 CFR 285.109

Enforcement Action: W

INSPECTION PROCEDURE:

Review the MMS office file records to determine if the company information and the information for the officer or agent authorized to be served with process is current and correct.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for each company file audit if the information is not correct or current.

INSPECTION COUNT/ INC COUNT:

Issue one warning (W) INC for not notifying the MMS within 120 days of any company mergers, name changes, or change of business form.

BONDING

T-804 DOES THE LESSEE MAINTAIN THE APPROPRIATE BOND OR FINANCIAL ASSURANCE INSTRUMENT AS REQUIRED?

Authority: 30 CFR 285.525

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Verify that the lease specific bond complies with each stage of the lease.
2. Verify that the supplemental bond or other financial assurance complies with the MMS requirements.
3. Verify, using Treasury Circular 570, that the Surety is capable of providing a bond of the requested financial assurance amount.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of bonding coverage if bonding requirements are not met.

Issue one facility shut-in (S) INC for one or more facilities on a lease if bonding requirements are not met within the time specified for correction.

INSPECTION COUNT/ INC COUNT:

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

T-805 HAS THE LESSEE NOTIFIED MMS WITHIN 3-BUSINESS DAYS AFTER LEARNING THAT AN ACTION WAS FILED ALLEGING THAT THE LESSEE, THE SURETY, OR THE GUARANTOR PROVIDING REQUIRED FINANCIAL SECURITY ARE INSOLVENT OR BANKRUPT?

Authority: 30 CFR 285.530

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the MMS was notified within 3-business days after the lessee learned an action was filed alleging that the lessee, the surety, or the guarantor are bankrupt or insolvent.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of required financial coverage if the MMS was not notified as required.

INSPECTION COUNT/ INC COUNT:

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

T-806

IF THE LESSEE’S BOND OR FINANCIAL ASSURANCE IS REDUCED IN VALUE DURING THE TERM OF THE REQUIRED FINANCIAL COVERAGE, HAS THE LESSEE PROVIDED ACCEPTABLE ALTERNATIVE FINANCIAL COVERAGE TO THE MMS?

Authority: 30 CFR 285.531

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. If the value of a bond submitted as security to the MMS has decreased in value, verify the lessee has provided evidence of additional alternative financial security to the MMS within 45 days or such shorter period of time as the MMS may direct.

2. If a bond submitted as security to the MMS has lapsed during the required term of the coverage, verify that acceptable alternative financial security is promptly provided to the MMS.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of bonding coverage if acceptable alternative financial coverage was not provided, but has since been submitted.

Issue one facility shut-in (S) INC for one or more facilities covered by a required bond if acceptable alternative financial coverage was not provided within the specified time period to the MMS.

INSPECTION COUNT/ INC COUNT:

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

PLANS AND INFORMATION REQUIREMENTS

T-807

HAVE REQUIRED PLANS AND REPORTS BEEN RECEIVED AND ANY NECESSARY APPROVALS OBTAINED PRIOR TO CONDUCTING AN ACTIVITY OR OPERATION WITHIN THE TIME FRAME SPECIFIED BY REGULATIONS?

Authority: 30 CFR 285.600

Enforcement Action: W/C/S

601(a)

601(b)

601(c)

615(a)

700

702

711

902(a)

902(d)

824(a)

824(b)

912

INSPECTION PROCEDURE:

Verify that submittals (i.e., SAP, COP, GAP, Facility Design Report, Fabrication and Installation Report etc.) have been provided in the time frame required, and that required applications have been submitted and approvals obtained prior to conducting an activity or operation, i.e. plans for resource data gathering, self-inspections, operations, and the testing of technology devices, surveys and activities.

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-808

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

**Authority: 30 CFR 285.602
714**

Enforcement Action: W

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-809

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.
1. 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-810

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.
2. 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-811

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

Authority: 30 CFR 285.640

Enforcement Action: W/C/S

641

650

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-812

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.

CERTIFIED VERIFICATION AGENT

T-813

DID THE LESSEE UTILIZE A CERTIFIED VERIFICATION AGENT (CVA) AS REQUIRED BY MMS TO REVIEW AND CERTIFY THE FACILITY DESIGN REPORT, THE FABRICATION AND INSTALLATION REPORT, AND THE PROJECT MODIFICATIONS AND REPAIR REPORT?

Authority: 30 CFR 285.705

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify from office records that a certified verification agent (CVA) reviewed and certified the following reports:

1. Facility design report
2. Fabrication and installation report
3. Project modification and repair report

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 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.

T-814

HAS THE LESSEE MET THE REQUIREMENTS AND RECEIVED APPROVAL TO HAVE MMS WAIVE THE CERTIFIED VERIFICATION AGENT (CVA)?

Authority: 30 CFR 285.705(b)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify from office records that a written approval was received from the MMS to waive a certified verification agent (CVA).

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 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.

ENVIRONMENTAL AND SAFETY MANAGEMENT,
INSPECTIONS, AND FACILITY ASSESSMENTS

T-815

DOES THE OPERATOR CONDUCT ACTIVITIES ON THEIR LEASE OR GRANT USING TRAINED PERSONNEL AND TECHNOLOGIES, PRECAUTIONS, AND TECHNIQUES THAT WILL NOT CAUSE UNDUE HARM OR DAMAGE TO NATURAL RESOURCES??

Authority: 30 CFR 285.800

Enforcement Action: W/C

INSPECTION PROCEDURE:

Verify that

1. Lessee's training plan provides a process to ensure that employees understand and can perform their assigned job duties safely.
2. Lessee's is utilizing the best available and safest technology (BAST) technologies, precautions, and techniques that will not cause undue harm or damage to natural resources

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for an audit of one or more employees if the training plan fails to provide a process to ensure that employees understand and can perform their assigned job duties.

Issue one component shut-in (C) INC for one or more employees that do not understand or cannot perform their assigned job duties.

Note: The employee is the component.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per training plan audited.

T-816

DOES THE OPERATOR REPORT TO MMS THE POTENTIAL ARCHAEOLOGICAL RESOURCES WHILE CONDUCTING APPROVED ACTIVITIES?

Authority: 30 CFR 285.802a (1)&(2)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that

1. All reporting requirements listed in 30 CFR 285. 802 have been included and submitted to the MMS upon discovery of a potential archaeological resource.
2. Lessee notified MMS within 72 hours of an archaeological discovery and that all seafloor disturbances activities within the area of discovery were halted.

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 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 audit.

SAFETY MANAGEMENT SYSTEMS

T-817

DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE HOW THEY WILL ENSURE SAFETY OF PERSONNEL OR ANYONE ON OR NEAR THEIR FACILITIES?

Authority: 30 CFR 285.810 (a)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

1. Verify that lessee's SMS plan includes procedures, which directly address human factors issues associated with the interaction between facility and personnel.
2. Verify that these procedures address safe and environmentally sound operations.

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-818

DOES THE LESSEE'S SAFETY MANAGEMENT SYSTEM (SMS) DESCRIBE THEIR REMOTE MONITORING, CONTROL, AND SHUT DOWN CAPABILITIES?

Authority: 30 CFR 285.810(b)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that Lessee's SMS include procedures for sound operation of each facility that are consistent with the safety and environmental information including but not limited to startup, normal operations, temporary operations, simultaneously operations, remote monitoring operations, emergency shutdown and isolation, and normal shutdown.

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-819

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-820

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-821

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-822

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-823

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 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.

T-824

HAS THE MMS BEEN NOTIFIED WHEN EQUIPMENT IS RETURNED TO SERVICE?

Authority: 30 CFR 250.813 (3)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the lessee or the ROW holder has reported to the MMS when equipment is returned to service.

IF NONCOMPLIANCE EXISTS:

Issue one warning (**W**) INC for failure to notify the MMS when equipment is returned to service.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

EQUIPMENT FAILURE AND ADVERSE ENVIRONMENTAL EFFECTS

T-825

HAS THE LESSEE SUBMITTED TO THE MMS A REPORT ON THE MAJOR REPAIR OF FACILITY DAMAGE OR THE FAILURE OF PIPELINE, CABLE, OR OTHER EQUIPMENT?

Authority: 30 CFR 250.815 (a)

Enforcement Action: W/C

Definition: Major Repair is a corrective action involving structural members affecting the structural integrity of a portion of or all the facility.

INSPECTION PROCEDURE:

1. Verify that a detailed report on the repair of equipment was submitted to the MMS after completion of the repairs.
2. Verify that the detailed report includes the required information.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for equipment repair if a detailed report on the repair does not include:

1. Description of the repairs;
2. Results of test; and
3. Date equipment was returned to service.

Issue one component shut-in (C) INC for a pipeline or pipeline component repair if:

1. A detailed report on the repair was not submitted to the MMS after completion of the repairs.
2. After a review of the report, the MMS cannot determine that continued activity 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.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per equipment audit.

T-826

IF REQUESTED BY MMS HAS THE LESSEE SUBMIT A COMPREHENSIVE WRITTEN REPORT OF ANY CABLE, PIPELINE, OR FACILITY DAMAGE ANALYZED?

Authority: 30 CFR 250.815(c)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that a comprehensive written report of the analysis of any cable, pipeline, or facility damage or failure was submitted by the lessee to the MMS when requested.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC for a cable, pipeline, or facility damage or failure audit if a comprehensive written report of the analysis of the cable, pipeline, or facility damage or failure was not submitted to the MMS within the time frame specified.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per audit.

T-827

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-828

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-829

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-830

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.

T-831

DID LESSEE ANNUALLY SUBMIT TO THE MMS A REPORT ON THEIR COMPREHENSIVE ANNUAL SELF-INSPECTIONS NO LATER THEN NOVEMBER 1ST EACH YEAR?

Authority: 30 CFR 285.824(b)

Enforcement Action: W/C/S

INSPECTION PROCEDURE

Verify that lessee's report includes

1. A list of facilities inspected in the preceding 12 months;
2. Type of inspection employed, (i.e., visual, magnetic particle, ultrasonic testing)
3. A summary of the inspection indicating what repairs, if any, were needed and the overall structural condition of the 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 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-832

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

Enforcement Action: W

30 CFR 250.832

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-833

HAS 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

Enforcement Action: W

250.832

250.833

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-834

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.

T-835

DID LESSEE SUBMIT A DECOMMISSIONING NOTICE TO THE MMS FOLLOWING THE APPROVAL OF THE DECOMMISSIONING APPLICATION?

Authority: 30 CFR 285.905

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that lessee submitted a decommissioning notice to the MMS at least 60 days before commencing decommissioning activities.

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 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.

T-836

DID LESSEE SUBMIT A DECOMMISSIONING APPLICATION IN THE SPECIFIED TIMEFRAME?

Authority: 30 CFR 285.905

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Verify that lessee submitted a decommissioning application upon the earliest of the following dates:

1. 2 years before the expiration of lease.
2. 90 days after completion of your commercial activities on a commercial lease.
3. 90 days after completion of approved activities under a limited lease on a ROW grant or RUE grant.
4. 90 days after cancellation, relinquishment, or other termination of lease or grant.

IF NONCOMPLIANCE EXISTS:

Issue one warning (W) INC if lessee did not submit a decommissioning application in the specified timeframe.

INSPECTION COUNT/ INC COUNT:

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

T-837

IS THE FACILITY DECOMMISSIONED AS REQUIRED AND HAS ALL APPROPRIATE APPLICATION INFORMATION BEEN PROVIDED TO MMS?

Authority: 285.906

Enforcement Action: W

908

909

910

INSPECTION PROCEDURE:

1. Verify (witness or from records) that facilities are removed to a depth of at least 15 feet below the mud line.
2. Verify that required information is correct on all applications

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the facility is not removed as required.

INSPECTION COUNT/ INC COUNT:

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

T-838

DID LESSEE AFTER REMOVAL OF THE FACILITY, CABLE OR PIPELINE SUBMIT A WRITTEN REPORT TO THE MMS WITHIN THE SPECIFIED TIME FRAME?

Authority: 285.912

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that lessee submitted to MMS a written report within 60 days after removal of the facility, cable, or pipeline.
2. Verify that the written report meets the requirements listed in 285.912

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the lessee did not submit a written report with the required information to the MMS within the specified timeframe.

INSPECTION COUNT/ INC COUNT:

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