

WELL-COMPLETIONS

(Last update - December 2000)

WELL-COMPLETION OPERATIONS

(Last update - December 2000)

C-100

HAVE ALL WELLS IN THE SAME WELLBAY WHICH ARE CAPABLE OF PRODUCING HYDROCARBONS BEEN SHUT-IN BELOW THE SURFACE WITH A PUMP-THROUGH-TYPE TUBING PLUG OR SCSSV AND AT THE SURFACE WITH A CLOSED MASTER VALVE PRIOR TO MOVING WELL-COMPLETION RIGS AND RELATED EQUIPMENT (OR AS OTHERWISE APPROVED BY THE DISTRICT SUPERVISOR)?

Authority: 502

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Check the facility/operator's records to verify that the wells capable of producing hydrocarbons were shut-in as follows prior to moving well-completion equipment:
 - A. Below the surface with a pump-through-type tubing plug or SSSV.
 - B. At the surface with a closed master valve.
 - C. As otherwise approved by the District Supervisor.
2. A closed surface-controlled subsurface safety valve of the pump-through-type may be used in lieu of the pump-through-type tubing plug, provided that the surface control has been locked out of operation.
3. If the inspection is conducted while well-completion equipment is being moved, inspect each well capable of producing hydrocarbons to verify that it is shut-in as described above.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that wells capable of producing hydrocarbons in the same wellbay have not been shut-in below the surface and at the surface.

Issue a component shut-in (C) INC for the moving operation if moving operations are in progress and wells capable of producing hydrocarbons in the same wellbay have not been shut-in below the surface and at the surface.

INSPECTION FORM:

Enter one item checked per facility.

C-101

IS THE WELL, FROM WHICH THE RIG OR RELATED EQUIPMENT IS TO BE MOVED, EQUIPPED WITH A SHUT-IN BACK PRESSURE VALVE PRIOR TO REMOVING THE BOP SYSTEM AND INSTALLING THE TREE?

Authority: 502

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Check the operator's records to verify that the well from which the well-completion equipment was moved was equipped with a back-pressure valve prior to removing the BOP and installing the tree.
2. If moving operations are in progress during the inspection, verify that the back-pressure valve is in place.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that a back-pressure valve was not installed in the well prior to moving the completion equipment.

Issue a component shut-in (C) INC for the moving operation if moving operations are in progress and a back-pressure valve is not installed in the well prior to moving the completion equipment.

INSPECTION FORM:

Enter one item checked per facility.

C-102

HAVE CREW MEMBERS BEEN INSTRUCTED IN THE SAFETY REQUIREMENTS OF THE OPERATIONS TO BE PERFORMED, POSSIBLE HAZARDS TO BE ENCOUNTERED, AND GENERAL SAFETY CONSIDERATIONS TO PROTECT PERSONNEL, EQUIPMENT, AND THE ENVIRONMENT PRIOR TO ENGAGING IN WELL-COMPLETION OPERATIONS; AND HAVE THE DATE AND TIME OF THE SAFETY MEETINGS BEEN RECORDED?

Authority: 506

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that all crew members have received instruction at safety meetings in the following prior to commencing well-completion operations and that the date and time of the meetings have been recorded:

1. Safety requirements of the operation to be performed.
2. Possible hazards to be encountered.
3. General safety considerations to protect:
 - A. Personnel
 - B. Equipment
 - C. Environment

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if:

1. The safety meeting was not held prior to commencing well-completion operations.
2. The time and date of the safety meetings were not recorded.

INSPECTION FORM:

Enter one item checked per facility.

C-104

HAVE ALL UNITS BEING USED FOR WELL-COMPLETION OPERATIONS WHICH HAVE BOTH A TRAVELING BLOCK AND A CROWN BLOCK BEEN EQUIPPED WITH A SAFETY DEVICE WHICH IS DESIGNED TO PREVENT THE TRAVELING BLOCK FROM STRIKING THE CROWN BLOCK?

Authority: 511

Enforcement Action: C

DEFINITION:

Traveling block safety device - Normally a device (toggle) installed above the cable drum which, when struck, disengages the drum clutch and sets the brake (also known as a "Crown-o-matic").

INSPECTION PROCEDURE:

1. Visually inspect the completion unit to verify the presence of a traveling block safety device.
2. Visually inspect the position of the toggle above the cable drum to verify the distance for cable shut-down.
3. If completion operations are in progress, verify that the device is in service and witness the proper operation of the device.

Note: The traveling block safety device is not to be actuation tested when the traveling block is loaded with drill pipe or work string.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion unit if:

1. The traveling block safety device is not installed.
2. The toggle is not installed above the cable drum a sufficient distance for cable shut-down.
3. The device does not operate properly.

INSPECTION FORM:

Enter one item checked per facility.

C-105

HAS THE TRAVELING-BLOCK SAFETY DEVICE BEEN CHECKED FOR PROPER OPERATION WEEKLY AND AFTER EACH DRILL-LINE SLIPPING OPERATION, AND HAVE THE RESULTS OF THE OPERATIONAL CHECK BEEN RECORDED IN THE OPERATIONS LOG?

Authority: 511

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that the traveling-block safety device has been checked for proper operation:
 - A. Weekly; and
 - B. After each drill-line slipping operation.
2. Verify that the toggle has been reset after each drill line slipping operation.
3. Verify that the results of the operational checks have been recorded in the operations log.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if:

1. The safety device has not been checked for proper operation as required.
2. The results were not recorded in the operations log.

INSPECTION FORM:

Enter one item checked per facility.

C-115

DOES THE BOP SYSTEM FOR WELL-COMPLETION OPERATIONS INCLUDE FOUR PREVENTERS WHEN THE EXPECTED SURFACE PRESSURE IS 5,000 PSI OR GREATER?

Authority: 515(b)(2)

Enforcement Action: C

INSPECTION PROCEDURE:

1. For completion operations where the anticipated surface pressure is equal to or greater than 5000 psi, visually inspect the BOP system to verify the installation of the following as a minimum:
 - A. One annular preventer,
 - B. Two sets of pipe rams, and
 - C. One set of blind or blind-shear rams.
2. For subsea BOP stacks, visually check the control station for the above configuration or, if available, check via the television camera.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if the BOP system is not as required.

INSPECTION FORM:

Enter one item checked for each device inspected.

C-116

DOES THE BOP SYSTEM FOR WELL-COMPLETION OPERATIONS INCLUDE DUAL PIPE RAMS INSTALLED ON ONE OF THE PIPE-RAM PREVENTERS WHEN DUAL TUBING STRINGS ARE BEING HANDLED SIMULTANEOUSLY?

Authority: 515(b)(2)

Enforcement Action: C

INSPECTION PROCEDURE:

For completion operations when dual tubing strings are being handled simultaneously, visually inspect the BOP system to verify that dual pipe rams are installed in one of the pipe ram preventers.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if dual pipe rams are not installed in one of the pipe ram preventers when dual tubing strings are being handled simultaneously.

INSPECTION FORM:

Enter one item checked per facility.

C-117

WHEN TAPERED DRILL STRING IS USED, DOES THE BOP SYSTEM INCLUDE AT LEAST FOUR PREVENTERS WHEN THE EXPECTED SURFACE PRESSURE IS LESS THAN 5,000 PSI?

Authority: 515(b)(3)(i)

Enforcement Action: C

INSPECTION PROCEDURE:

For completion operations using tapered drill string where the anticipated surface pressure is less than 5,000 psi, visually inspect the BOP system to verify the installation of at least four preventers as follows:

1. One annular preventer.
2. Two sets of pipe rams as follows:
 - A. One set capable of sealing around the larger size drill string, and
 - B. One set capable of sealing around the smaller size drill string.

Note: One set of variable bore rams may be substituted for the two sets of pipe rams.
3. One set of blind or blind-shear rams.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if the BOP system is not configured as described above.

INSPECTION FORM:

Enter one item checked per facility.

C-118

WHEN TAPERED DRILL STRING IS USED, DOES THE BOP SYSTEM INCLUDE AT LEAST FIVE PREVENTERS, WHEN THE EXPECTED SURFACE PRESSURE IS 5,000 PSI OR GREATER?

Authority: 515(b)(3)(ii)

Enforcement Action: C

INSPECTION PROCEDURE:

For completion operations using tapered drill string where the anticipated surface pressure is equal to or greater than 5,000 psi, visually inspect the BOP system to verify the installation of at least five preventers as follows:

1. One annular preventer.
2. Two sets of pipe rams capable of sealing around the larger size drill string.
3. One set of pipe rams capable of sealing around the smaller size drill string.
4. One set of blind or blind-shear rams.

Note: One set of variable bore pipe rams may be substituted for one set of pipe rams for the larger size drill string and one set of pipe rams for the smaller size drill string.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if the BOP system is not configured as described above.

INSPECTION FORM:

Enter one item checked per facility.

C-119

DOES THE ACCUMULATOR SYSTEM PROVIDE SUFFICIENT CAPACITY TO SUPPLY 1.5 TIMES THE VOLUME NECESSARY TO CLOSE AND HOLD CLOSED ALL BOP EQUIPMENT UNITS WITH A MINIMUM PRESSURE OF 200 PSI ABOVE THE PRECHARGE PRESSURE, WITHOUT ASSISTANCE FROM A CHARGING SYSTEM?

Authority: 515(c)(1)

Enforcement Action: C

INSPECTION PROCEDURE:

1. Verify that the BOP actuating system is installed as approved.
2. Verify that the complete system is free of leaks and that all components are in service (not bypassed).
3. Witness automatic operation of the charging system.

Note: Refer to Appendix 23 for typical surface stack accumulator size calculations.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if the hydraulic BOP actuating system does not provide sufficient capacity to supply 1.5 times the volume necessary to close all BOP components with a minimum pressure of 200 psi above the precharge pressure.

INSPECTION FORM:

Enter one item checked per facility.

C-120

DOES THE BOP SYSTEM FOR WELL-COMPLETION OPERATIONS CONTAIN A SECONDARY POWER SOURCE, INDEPENDENT FROM THE PRIMARY POWER SOURCE, WITH SUFFICIENT CAPACITY TO CLOSE ALL BOP SYSTEM COMPONENTS AND HOLD THEM CLOSED?

Authority: 515(c)(2)

Enforcement Action: C

INSPECTION PROCEDURE:

1. Verify that the backup power source is independent from the primary power source.
2. Witness operation of the accumulator backup system and verify that the backup system automatically charges the accumulators sufficiently to close and hold closed all BOP system components.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the workover rig if:

1. The backup power system is not independent from the primary power source.
2. The accumulator backup does not automatically charge the accumulator system sufficiently to close and hold closed all system components.

INSPECTION FORM:

Enter one item checked per facility.

C-121

DOES THE BOP SYSTEM FOR WELL-COMPLETION OPERATIONS CONTAIN LOCKING DEVICES FOR THE RAM TYPE PREVENTERS?

Authority: 515(c)(3)

Enforcement Action: C

DEFINITION:

Locking devices - Surface BOP systems shall have dogs provided on the ram-type preventers. Subsurface BOP systems shall have ram lock-out indicator lights or other indication method as approved.

INSPECTION PROCEDURE:

1. Visually inspect surface BOP systems and subsea BOP panels to verify that locking devices have been provided on ram-type preventers.
2. If conditions permit, witness operation of locking devices.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if operable locking devices are not provided.

INSPECTION FORM:

Enter one item checked for each ram-type preventer inspected.

C-122

DOES THE BOP SYSTEM FOR WELL-COMPLETION OPERATIONS CONTAIN AT LEAST ONE REMOTE BOP CONTROL STATION AND ONE BOP CONTROL STATION ON THE RIG FLOOR?

Authority: 515(c)(4)

Enforcement Action: C

DEFINITION:

Remote BOP control station - A control panel located such that the operation of each preventer and control valve can be controlled from a readily accessible point at a safe distance from the rig floor.

INSPECTION PROCEDURE:

1. Verify that a readily accessible remote BOP control station exists at the rig site.
2. Verify that a BOP control station exists on the rig floor.
3. Witness the operation of both control stations or inspect the control panel gauge for presence of operating control pressure.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if:

1. An operable remote BOP control station is not installed.
2. An operable BOP control station is not installed on the rig floor.

INSPECTION FORM:

Enter one item checked for each control station inspected.

C-123

DOES THE BOP SYSTEM FOR WELL-COMPLETION OPERATIONS CONTAIN A CHOKE LINE AND A KILL LINE EACH EQUIPPED WITH TWO FULL OPENING VALVES AND A CHOKE MANIFOLD?

Authority: 515(c)(5)

Enforcement Action: C

INSPECTION PROCEDURE:

1. Visually verify that each choke and kill line is equipped with two full-opening valves and a choke manifold.
2. Conditions permitting, witness the operation of the valves.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if:

1. The choke and kill lines are not equipped with two operable full opening valves.
2. There is no manifold.

INSPECTION FORM:

Enter one item checked for each line inspected.

C-124

DOES THE BOP SYSTEM FOR WELL-COMPLETION OPERATIONS CONTAIN AT LEAST ONE REMOTELY-CONTROLLED VALVE EACH ON THE CHOKE LINE AND ON THE KILL LINE?

Authority: 515(c)(5)

Enforcement Action: C

INSPECTION PROCEDURE:

Visually inspect the choke and kill lines to determine if they are each equipped with at least one remotely-controlled valve.

Note: For the kill line (surface systems only), a check valve may be installed on the kill line in lieu of the remotely-controlled valve provided two readily accessible manual valves are in place, and the check valve is placed between the manual valves and the pump.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if:

1. The choke line is not equipped with at least one remotely-controlled valve.
2. The kill line is not equipped with at least one remotely-controlled valve.

INSPECTION FORM:

Enter one item checked for each line inspected.

C-125

IS THE PRESSURE RATING OF THE CHOKE AND KILL LINE AND ASSOCIATED EQUIPMENT AT LEAST EQUIVALENT TO THE PRESSURE RATING OF THE RAM PREVENTERS?

Authority: 515(c)(5)

Enforcement Action: C

INSPECTION PROCEDURE:

Visually verify that all equipment has a rated working pressure at least equal to the rated working pressure of the ram preventers by examining the rating tags.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if any equipment does not have a rated working pressure at least equal to the rated working pressure of the ram type preventers.

INSPECTION FORM:

Enter one item checked per facility.

C-126

IS AN INSIDE BOP OR SPRING-LOADED, BACK-PRESSURE SAFETY VALVE AND AN ESSENTIALLY FULL-OPENING, WORK-STRING SAFETY VALVE IN THE OPEN POSITION BEING MAINTAINED ON THE RIG FLOOR AT ALL TIMES DURING WELL-COMPLETION OPERATIONS?

Authority: 515(d)

Enforcement Action: C

INSPECTION PROCEDURE:

1. Verify that the inside BOP and drill-string safety valves fitting all sizes of pipe in the drill-string are available on the rig floor and are operable.
2. Verify that the inside BOP and drill-string safety valves have a rated working pressure equal to or greater than the rated working pressure of the BOP stack in use.
3. Visually confirm that the inside BOP and drill-string safety valves are in the open position.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if:

1. The required inside BOP and drill-string safety valve are not available on the rig floor.
2. The valves are not maintained in the open position.
3. The valves do not have a rated working pressure equal to or greater than the rated working pressure of the BOP stack in use.

INSPECTION FORM:

Enter one item checked for each valve inspected.

C-127

IS A WRENCH FITTING THE WORK-STRING SAFETY VALVE(S) READILY AVAILABLE?

Authority: 515(d)

Enforcement Action: C

INSPECTION PROCEDURE:

Verify that wrenches to fit each valve in use are available in the rig floor area.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the completion rig if the wrenches are not readily available.

INSPECTION FORM:

Enter one item checked for each valve inspected.

C-132

HAVE SURFACE BOP SYSTEMS BEEN PRESSURE TESTED WITH WATER?

Authority: 516(d)(1)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that pressure tests on surface BOP systems were conducted with water.
2. Witness the test if it is conducted during inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that the surface BOP system was not pressure tested with water in the past, but subsequent test was conducted with water.

Issue a component shut-in (C) INC for the completion rig if the surface BOP system has not been tested with water.

INSPECTION FORM:

Enter one item checked per facility.

C-133

HAS THE ANNULAR-TYPE BOP BEEN SUCCESSFULLY TESTED AT 70 PERCENT OF ITS RATED WORKING PRESSURE (OR AS OTHERWISE APPROVED BY THE DISTRICT SUPERVISOR)?

Authority: 516(b)(3)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Determine the rated working pressure of the annular-type BOP by visually inspecting the body of the preventer for a rating stamping or tag.
2. Inspect the operator's log to verify that the annular-type preventers were pressure tested to 70 percent of the rated working pressure, or as otherwise approved by the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that pressure test was not performed to 70 percent of the rated working pressure of the annular-type preventer, but subsequent test was performed to 70 percent of the rated working pressure.

Issue a component shut-in (C) INC for the completion rig if the annular-type preventers were not tested to 70 percent of the rated working pressure.

INSPECTION FORM:

Enter one item checked per facility.

C-134

HAS EACH VALVE IN THE CHOKE AND KILL MANIFOLDS BEEN SUCCESSFULLY, SEQUENTIALLY PRESSURE TESTED TO THE RAM-TYPE BOP TEST PRESSURE?

Authority: 515(c)(5)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that each valve in the choke and kill manifolds has been sequentially tested to the ram-type BOP test pressure.
2. Witness actual tests if being performed during inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the valves have been tested to less than the BOP test pressure, but were later tested to the BOP test pressure.

Issue a component shut-in (C) INC for the completion rig if the valves have not been tested to the ram-type test pressure.

INSPECTION FORM:

Enter one item checked for each valve inspected.

C-135

HAVE THE BOP SYSTEMS BEEN TESTED WHEN INSTALLED?

Authority: 516(a)(1)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that tests were performed when the BOP system was initially installed.
2. Witness the tests if they are being performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if operations have commenced without the initial tests but subsequent tests have been performed.

Issue a component shut-in (C) INC for the completion rig if installation has been accomplished and no tests have been performed.

INSPECTION FORM:

Enter one item checked for each system inspected.

C-136

HAVE THE BOP SYSTEMS BEEN TESTED BEFORE 14 DAYS HAD ELAPSED SINCE THE LAST BOP PRESSURE TEST?

Authority: 516(a)(2)

Enforcement Action: W/C

INSPECTION PROCEDURE:

Inspect operations log to verify that tests were performed at least every 14 days.

Note:

1. More than 14 days between tests is allowed when:
 - A. Well operations prevent testing due to problems such as:
 - 1 Stuck pipe.
 2. Pressure control operations.
 3. Remedial well efforts.
 - B. The tests shall be conducted as soon as possible after the problem is solved but before normal operations resume.
2. The reason for postponing testing shall be entered into the operations log.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that tests other than most recent test exceeded the 14-day interval required without acceptable explanation in the operator's log.

Issue a component shut-in (C) INC for the completion rig if the date of most recent test exceeds the 14 days and acceptable explanation is not entered in the operator's log.

INSPECTION FORM:

Enter one item checked for each system inspected.

C-137

HAVE THE BLIND/BLIND-SHEAR RAMS BEEN PRESSURE TESTED AT LEAST ONCE EVERY 30 DAYS?

Authority: 516(d)(4)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that the blind or blind-shear rams have been tested at least once every 30 days.
2. If inspection is being performed during testing of the blind or blind-shear rams, witness the test.

Note: A longer period between blowout preventer tests is allowed when there is a stuck pipe or pressure-control operation and remedial efforts are being performed. The tests shall be conducted as soon as possible and before normal operations resume. The reason for postponing testing shall be entered into the operations log.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that tests other than most recent test exceeded the 30-day requirement.

Issue a component shut-in (C) INC for the completion rig if a test has not been conducted in the last 30 days.

INSPECTION FORM:

Enter one item checked for each system inspected.

C-138

HAVE THE BOP SYSTEMS BEEN TESTED FOLLOWING REPAIRS THAT REQUIRE DISCONNECTING A PRESSURE SEAL IN THE ASSEMBLY?

Authority: 516(d)(7)

Enforcement Action: W/C

Note: Only the affected seal need be pressure tested.

INSPECTION PROCEDURE:

Inspect operator's log to verify that, where repairs required disconnection of pressure seals, tests on affected seals were conducted.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that operations commenced without tests being conducted on the seals, but subsequent BOP tests were conducted.

Issue a component shut-in (C) INC for the completion rig if no tests were conducted on the seals following repairs.

INSPECTION FORM:

Enter one item checked for each system inspected.

C-139

DO THE TESTS ALTERNATE BETWEEN CONTROL STATIONS AND AT STAGGERED INTERVALS TO ALLOW EACH CREW TO OPERATE THE EQUIPMENT?

Authority: 516(d)(3)

Enforcement Action: W/C

INSPECTION PROCEDURE:

1. Inspect operator's log to verify that each crew has been allowed to operate the equipment during tests.
2. Verify that all control stations are functional.
3. Conditions permitting, witness operation of the BOP equipment by the crew on tour.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that each crew has not operated the BOP equipment during tests. Issue a component shut-in (C) INC for the completion rig if either control station is found to be inoperable.

INSPECTION FORM:

Enter one item checked for each control station inspected.

C-140

ARE ALL PERSONNEL ENGAGED IN WELL-COMPLETION OPERATIONS PARTICIPATING IN A WEEKLY BOP DRILL TO FAMILIARIZE CREW MEMBERS WITH APPROPRIATE SAFETY MEASURES?

Authority: 516(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect operator's log to verify that all personnel are participating in weekly well-control drills and that they have been recorded.

Note: The operator may be instructed to conduct a BOP drill at any time during the inspection while operations are in progress after consulting with the company representative.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if weekly BOP drills have not been conducted or recorded.

INSPECTION FORM:

Enter one item checked per facility.

C-141

ARE THE TIME, DATE, AND RESULTS OF ALL PRESSURE TESTS, ACTUATION, INSPECTIONS, AND CREW DRILLS OF THE BOP SYSTEM, SYSTEM COMPONENTS, AND MARINE RISERS RECORDED IN THE DRILLERS REPORT OR REFERENCED DOCUMENT?

Authority: 516(i)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Check the operations log to verify that the time, date, and results of all pressure tests, actuation, inspections, and crew drills of BOP systems, system components, and marine risers are recorded.
2. As an alternative, the documentation required to be entered in the operations log may be referenced there. If the time, date, and results of the pressure tests, actuation, inspections, and crew drills of BOP systems, system components, and marine risers is referenced in the operations log, check the referenced document to verify that the documentation is there.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the time, date and results of all pressure tests, actuation, inspections, and crew drills of the BOP system, system components, and marine risers are not entered in the operations log or referenced document.

INSPECTION FORM:

Enter one item checked per inspection.

C-142

HAS THE CASING BEEN PRESSURE-TESTED, CALIPERED, OR OTHERWISE EVALUATED EVERY 30 DAYS DURING PROLONGED OPERATIONS?

Authority: 517(b)

Enforcement Action: W

Note: This PINC applies to prolonged operations that could damage the casing, such as milling, fishing, jarring, or washing over.

INSPECTION PROCEDURE:

1. Inspect the operator's log to determine if prolonged operations that could damage the casing have been conducted.
2. If such prolonged operations have been conducted, verify that the casing has been pressure tested, calipered, or otherwise evaluated every 30 days.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the operator's log indicates that the casing has not been evaluated every 30 days during prolonged operations that could damage the casing.

INSPECTION FORM:

Enter one item checked per facility.

C-143

ARE BOP TEST PRESSURES RECORDED ON A PRESSURE CHART?

Authority: 516(i)(1)

Enforcement Action: W

516(j)

INSPECTION PROCEDURE:

1. Verify that the BOP test pressures have been recorded on a pressure chart by requesting to view the actual chart.
2. Prior to inspection, check office records to determine if the District Supervisor has approved an alternate method of recording BOP test pressures.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the BOP test pressures have not been recorded on a pressure chart or alternative method approved by the District Supervisor.

INSPECTION FORM:

Enter one item checked per inspection.

C-144

IS THE TEST INTERVAL FOR EACH BOP COMPONENT TESTED FOR A MINIMUM OF 5 MINUTES TO DEMONSTRATE THAT THE COMPONENT IS EFFECTIVELY HOLDING PRESSURE?

Authority: 516(c)

Enforcement Action: W

516(c)(1)

INSPECTION PROCEDURE:

Verify that each BOP component held pressure for at least five minutes or other time period approved by the District Supervisor by checking the pressure charts or alternative documentation as approved by the District Supervisor.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the pressure charts or other documentation indicate that each BOP component did not hold pressure for at least five minutes or other time period approved by the District Supervisor.

INSPECTION FORM:

Enter one item checked per inspection.

C-145

ARE BOP TEST PRESSURE CHARTS CERTIFIED AS CORRECT BY THE OPERATOR'S REPRESENTATIVE AT THE FACILITY?

Authority: 516(i)(2)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that each pressure chart contains a written certification (signature and date) by the operator's representative at the facility.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if any pressure chart does not contain a written certification by the operator's representative at the facility.

INSPECTION FORM:

Enter one item checked per inspection.

C-146

DOES THE DOCUMENTATION INDICATE THE SEQUENTIAL ORDER OF BOP AND AUXILIARY EQUIPMENT TESTING AND THE PRESSURE AND DURATION OF EACH TEST?

Authority: 516(i)(3)

Enforcement Action: W

INSPECTION PROCEDURE:

Check the operations log or referenced document to verify that the sequential order of BOP and auxiliary equipment testing and the pressure and duration of each test is recorded.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the documentation does not indicate the sequential order of BOP and auxiliary equipment testing and the pressure and duration of each test.

INSPECTION FORM:

Enter one item checked per inspection.

