

***MMS***  
**NATIONAL  
FIELD  
POTENTIAL INCIDENT  
OF  
NONCOMPLIANCE (PINC)  
AND  
GUIDELINE LIST**



## **PREFACE**

The Performance and Safety Branch of the Engineering and Operations Division wish to extend our appreciation to all participating MMS personnel and especially the District representatives for their dedicated effort and expertise in providing the MMS Inspection Program with this edition of the National PINC and Guideline List.

### **Revisions to Guidelines for the National PINC List**

The following format is presented as a means for MMS personnel to suggest revisions to the Guidelines to the National PINC List. All suggested revisions will be reviewed by the PINC List Revision Work Group. Before revisions are included in the National PINC List they will be routed to the Regional Supervisors/Field Operations, or their staff, for review and comment. Please submit suggested revisions directly to:

Minerals Management Service  
PINC List Revision Work Group  
Performance and Safety Branch  
Mail Stop 4023  
381 Elden Street  
Herndon, Virginia 20170

### **Suggested Revision Format:**

PINC Number:  
Enforcement Action:  
Definition:  
Inspection Procedure:  
If Noncompliance Exists:  
Inspection Form:  
Rationale:

### **Please be advised:**

**The guidelines in this document are to be considered the most preferable way of implementing the inspection and enforcement of each PINC and not intended as a directive or to supersede the regulatory language of Title 30 of the Code of Federal Regulations.**

**Also, the enforcement status of a Facility Shut-in (S) INC or a Component Shut-in (C) INC may not necessarily require the full extent of the enforcement specified. The Inspector has full authority to use their discretion when issuing a Component Shut-in (C) INC. However, when issuing a Facility Shut-in INC the Inspector must solicit approval from the District Supervisor prior to the actual shut-in of a facility. The only exception to this requirement is when there is an imminent danger to personnel, property, or the environment, exacting a more immediate MMS response.**

## **DESCRIPTION OF THE GUIDELINES TO THE NATIONAL PINC LIST**

The Guidelines to the National PINC List establish the procedures for the inspection of lessee operations and facilities by MMS personnel. The use of these guidelines for all inspections will result in an inspection program that is both fair and consistent in all OCS waters. The information provided in the Guidelines to the National PINC List is shown in the following outline of the format:

**PINC NUMBER:** A unique identifier for the specific characteristic to be inspected.

**PINC STATEMENT:** The description of the characteristic to be inspected.

**AUTHORITY:** The regulatory authority as found in Title 30 of the Code of Federal Regulations, part 250 (and part 254 when referring to oil spill response requirement PINC's).

**ENFORCEMENT ACTION:** The action to be taken by the MMS inspector for an identified violation. These actions are a complete facility shut-in (S), a component shut-in (C), or a warning (W). When more than one enforcement is listed for some characteristics, the criteria for each enforcement action is given in the "IF NONCOMPLIANCE EXISTS:" block.

**RATIONALE:** Describes the reason for the requirement and may indicate the possible results of a violation.

**DEFINITION:** Used only if needed.

**INSPECTION PROCEDURE:** Preferred detailed guidelines to be used by the MMS Inspectors during the performance of their inspection responsibilities. **However, as stated at the bottom of the previous page, the guidelines in this document are to be considered the most preferable way of implementing the enforcement of each PINC and not intended as a directive or to supersede the regulatory language of 30 CFR.**

**IF NONCOMPLIANCE EXISTS:** Describes the specific enforcement action to be taken when a violation of the regulations is determined and an Incident of Noncompliance (INC) is issued. An INC must be issued to document any negative (no) answer to a PINC statement. The number of INC's issued must correspond to the items number count addressed in the "Inspection Form" instructions.

**INSPECTION FORM:** Describes the number of items checked to be entered on the inspection form.

Examples:

**1. Enter one item checked per each facility.**

One (1) is entered in the "# CK" column on the inspection form and answered one (1) in the "#Y" or "#N" column. Bullet descriptions of each discrepancy may be used to identify the violation.

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

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

**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 is issued, since a shut-in would serve no useful purpose.**

## ACRONYMS USED

### Enforcement Actions

**W** Warning

**C** Component Shut-in

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

### Documents Referenced

ASME Boiler and Pressure Vessel Code

**ANSI/ASME SPPE-1** Quality Assurance and Certification of Safety and Pollution Prevention Equipment Used in Oil and Gas Operations

**ANSI Z88.2** Practices for Respiratory Protection

**API SPEC 2C** API Specification for Offshore Cranes

**API RP 2D** API Recommended Practice for Operation and Maintenance of Offshore Cranes

**API RP 13B** API Recommended Practice Standard Procedure for Field Testing Drilling Fluids

**API RP 14B** API Recommended Practice for Design, Installation, Repair and Operation of Subsurface Safety Valve Systems

**API RP 14C** API Recommended Practice for Analysis, Design, Installation and Testing of Basic Surface Safety Systems for Offshore Production Platforms

**API RP 14F** API Recommended Practice for Design and Installation of Electrical Systems for Offshore Production Platforms

**API RP 14FZ** API Recommended Practice for Design and Installation of Electrical Systems for Fixed and Floating Offshore Petroleum Facilities for Unclassified and Class I, Zone 0, Zone 1, and Zone 2 Locations

**API RP 14G** API Recommended Practice for Fire Prevention and Control on Open Type Offshore Production Platforms

**API RP 500** API Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Division 1 and Division 2

## Documents Referenced (cont.)

<b>API RP 505</b>	API Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Zone 0, Zone 1, and Zone 2
<b>API RP T2</b>	API Recommended Practice for Qualification Programs for Offshore Production Personnel Who Work with Anti-pollution Safety Devices
<b>ASME B30.4c</b>	Portal, Tower, and Pedestal Cranes

## Other Acronyms:

<b>ANSI</b>	- American National Standards Institute
<b>APD</b>	- Application for Permit to Drill
<b>API</b>	- American Petroleum Institute
<b>APM</b>	- Application for Permit to Modify
<b>ASME</b>	- American Society of Mechanical Engineers
<b>ATC</b>	- Automatic Temperature Compensator
<b>ATG</b>	- Automatic Temperature Gravity
<b>bar</b>	- $1 \times 10^6$ dynes per square centimeter
<b>bbbl</b>	- barrel
<b>BDV</b>	- Blowdown Valve
<b>BOP</b>	- Blowout Preventer
<b>BSL</b>	- Burner Flame Detector (burner safety low)
<b>ccs</b>	- cubic centimeters per second
<b>CFR</b>	- Code of Federal Regulations
<b>DOCD</b>	- Development Operations Coordination Document
<b>EOR</b>	- End of Operations Report
<b>ESD</b>	- Emergency Shutdown
<b>FSL</b>	- Low Flow Sensor (flow safety low)
<b>FSV</b>	- Flow Safety Valve (check valve)
<b>gpm</b>	- gallons per minute
<b>hp</b>	- horsepower
<b>H<sub>2</sub>S</b>	- Hydrogen Sulfide
<b>ID</b>	- Identification
<b>INC</b>	- Incident of Noncompliance
<b>PINC</b>	- Potential Incident of Noncompliance
<b>LEL</b>	- Lower Explosive Limit
<b>LSH</b>	- Level Safety High (high level sensor)
<b>LSL</b>	- Level Safety Low (low level sensor)
<b>MAOP</b>	- Maximum Allowable Operating Pressure
<b>MASP</b>	- Maximum Anticipated Surface Pressure
<b>MMS</b>	- Minerals Management Service

## **Other Acronyms (cont.):**

**MODU** - Mobile Offshore Drilling Unit  
**MPMS** - Manual of Petroleum Standards  
**MWD** - Measurement-while-drilling  
**OCS** - Outer Continental Shelf  
**od** - outside diameter  
**°F** - degrees Fahrenheit  
**pcf** - pounds per cubic foot  
**PFD** - Personal Flotation Device  
**pH** - measure of acidity and alkalinity (potential of hydrogen)  
**POE** - Plan of Exploration  
**ppg** - pounds per gallon  
**ppm** - parts per million  
**PSH** - Pressure Safety High (high pressure sensor)  
**psi** - pounds per square inch  
**psig** - pounds per square inch gauge  
**PSL** - Pressure Safety Low (low pressure sensor)  
**PSV** - Pressure Safety Valve (pressure relief valve)  
**PTO** - Power Take off  
**SAC** - Safety Analysis Checklist  
**SAFE** - Safety Analysis Function Evaluation  
**SCADA** - Supervisory Control and Data Acquisition  
**SCSSV** - Surface Controlled Subsurface Safety Valve  
**SDV** - Shutdown Valve  
**SITP** - Shut-in Tubing Pressure  
**SO<sub>2</sub>** - Sulfur Dioxide  
**SSCSV** - Subsurface Controlled Subsurface Safety Valve  
**SSSV** - Subsurface Safety Valve  
**SSV** - Surface Safety Valve  
**TSE** - Temperature Safety Element (fusible material)  
**TSH** - Temperature Safety High (high temperature sensor)  
**TSL** - Temperature Safety Low (low temperature sensor)  
**TVD** - True Vertical Depth  
**USV** - Underwater Safety Valve  
**UV** - Ultraviolet  
**WOC** - Waiting On Cement  
**WP** - Working Pressure

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