

DRILLING
LAST UPDATE MAY, 2008
TRAVELING BLOCK

D-100

IS AN OPERABLE CROWN BLOCK SAFETY DEVICE INSTALLED TO PREVENT THE TRAVELING BLOCK FROM STRIKING THE CROWN BLOCK?

Authority: 404

Enforcement Action: S

DEFINITION:

Crown block safety device - Normally a device (manual or electronic) installed to prevent the block from striking the crown.

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

INSPECTION PROCEDURE:

1. Inspect the rig to verify the installation of a crown block safety device (manual or electronic).
2. Visually inspect position of manual device above cable drum to verify the distance for cable shutdown.
3. Verify that the device (manual or electronic) has been reset after drill-line slipping operations.
4. Verify that the device (manual or electronic) is in service and witness the proper operation of the device.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when:

1. The crown block safety device is not installed or operable.
2. The manual device is not installed above the cable drum a sufficient distance for cable shutdown.
3. The manual or electronic device has not been reset after drill-line slipping operations.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each drilling unit inspected.

D-101

IS THE CROWN BLOCK SAFETY DEVICE CHECKED FOR PROPER OPERATION AT LEAST ONCE EACH WEEK, AFTER EACH DRILL-LINE SLIPPING OPERATION, AND ARE THE RESULTS ENTERED INTO THE DRILLER'S REPORT?

Authority: 404

Enforcement Action: W/S

INSPECTION PROCEDURE:

Check driller's report to verify that the crown block safety device is checked for operation weekly and after each drill-line slipping operation.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if a required check is not recorded in driller's report.

Issue a rig shut-in (S) INC if the required checks are not performed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each drilling unit inspected.

MOVING DRILLING RIGS

D-120

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

Authority: 406(b)

Enforcement Action: W/C

Note: All producible wells located in the affected wellbay must be shut in below the surface and at the wellhead when:

1. A drilling rig or related equipment is moved on and off an offshore platform, this includes rigging up and rigging down activities within 500 feet of the affected platform;
2. A drilling unit is moved or skidded between wells on a platform; and
3. A MODU is within 500 feet of a platform and until the MODU is in place, secured, and ready to begin drilling operations.

INSPECTION PROCEDURE:

1. Inspect records to determine if the wells were shut-in below the surface with a pump-through-type tubing plug and at the surface with a closed master valve.
2. If moving operations are in progress during the inspection, check to see that the wells are shut-in at the surface with a closed master valve, and check records to verify the placement of a pump-through-type tubing plug below the surface.
3. The District Manager may approve other means of assuring the safety of the facility during moving operations.
4. A closed surface-controlled subsurface safety valve may be used in lieu of the pump-through-type tubing plug, provided that surface control has been locked out.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that wells were not shut-in with a pump-through-type tubing plug and at the surface with a closed master valve prior to moving drilling rigs and related equipment. Issue a component (C) shut-in INC for the drilling rig moving operation if wells in the same well bay are not shut-in with a pump-through-type tubing plug and at the surface with a closed master valve if moving operations are in progress during the inspection.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per inspection.

D-121

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

Authority: 403(a)
403(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the Operator has properly notified the District Manager 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 all rigs from the location.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the proper notification has not been given.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each drilling unit inspected.

ESD SYSTEM

D-130

IS AN OPERABLE ESD STATION LOCATED NEAR THE DRILLER'S CONSOLE ON PLATFORMS WHERE THERE ARE PRODUCING WELLS OR OTHER HYDROCARBON FLOW?

Authority: 406(a)

Enforcement Action: C

Note: The offshore operator and contractor should be advised that the ESD station at the driller's console must be tested when installed and subsequent to each rig skid for system operability. The ESD station should be tested to shut in one well during initial installation of the ESD station and for system operability after the initial test. Furthermore The ESD station near the driller's console shall be rotated and tested in order when testing other ESD stations on the platform.

INSPECTION PROCEDURE:

1. Verify that there is an ESD station near the driller's console during drilling operations.
2. Verify operation of the ESD station by testing in accordance with Appendix 10.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for drilling operation when an ESD station:

1. Does not exist at the required location.
2. Does not operate properly.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC for each complex inspected.

CASING PROGRAM

D-150

IS CASING SET AS APPROVED?

Authority: 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 a warning (W) INC for each casing string not set as approved.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each casing string inspected

D-151

IS ANY PORTION OF AN ANNULUS OPPOSITE A PERMAFROST ZONE WHICH IS NOT PROTECTED BY CEMENT FILLED WITH A LIQUID WHICH HAS A FREEZING POINT BELOW THE MINIMUM PERMAFROST TEMPERATURE TO PREVENT INTERNAL FREEZEBACK AND WHICH IS TREATED TO MINIMIZE CORROSION?

Authority: 428(j)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Check APD and drilling plan to identify permafrost zones and to verify that the annulus within permafrost zones are filled with cement or liquid whose freezing point is lower than the permafrost temperature and which is treated to minimize corrosion.

2. Witness permafrost zone cementing operations.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if operations have not yet resumed and records indicate that the fluid in the annulus does not have a freezing point lower than the temperature of the permafrost or if it is not treated to minimize corrosion.

Issue a rig shut-in (S) INC if operations are in progress and the fluid or cement in the annulus does not have a freezing point lower than the temperature of the permafrost or if it is not treated to minimize corrosion, if conditions permit.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-152

HAS A PRESSURE-INTEGRITY TEST BEEN RUN BELOW THE SURFACE CASING, THE INTERMEDIATE CASING(S), AND LINER(S) USED AS INTERMEDIATE CASING(S), AFTER DRILLING AT LEAST 10 FEET BUT NO MORE THAN 50 FEET OF NEW HOLE BELOW THE CASING SHOE?

Authority: 427

Enforcement Action: W/S

INSPECTION PROCEDURE:

Inspect on-site records from the previous inspection to the current inspection date to verify that pressure tests to obtain data to be used in estimating formation fracture gradients have been performed as required.

Note:

1. Pressure-integrity tests shall be conducted either by testing to formation leak-off or to a predetermined equivalent mud weight as specified in the APD.

2. The District Manager may require a pressure-integrity test to be run at the conductor casing shoe due to local geologic conditions or planned casing setting depths.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC for each formation fracture gradient test not otherwise performed as required.

Issue a rig shut-in (S) INC if formation fracture gradient tests have not been performed and the tests can still be conducted.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each test inspected.

D-153

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: 427(b)

Enforcement Action: W/S

INSPECTION PROCEDURE:

Inspect the on-site 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 Manager.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate the safe margin has not been maintained.

Issue a rig shut-in (S) INC if, while present on the rig, the safe margin is not being maintained.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each drilling unit inspected

D-154

ARE THE RESULTS OF ALL TESTS AND OF HOLE-BEHAVIOR OBSERVATIONS MADE DURING THE COURSE OF DRILLING RELATED TO FORMATION INTEGRITY AND PORE PRESSURE RECORDED IN THE DRILLER'S REPORT?

Authority: 427(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect records to verify that the results of all tests and of hole behavior observations are recorded.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if all tests are not recorded in the driller's report.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each drilling unit inspected

D-155

IF THE HOLE FOR THE DRIVE OR STRUCTURAL CASING WAS DRILLED, WAS A QUANTITY OF CEMENT SUFFICIENT TO FILL THE ANNULAR SPACE BACK TO THE MUD LINE USED?

Authority: 421(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect records to verify that a sufficient quantity of cement was used to fill annular space back to mud line.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that the quantity of cement was insufficient.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-156

IS CEMENT FILL IN THE ANNULAR SPACES OF THE CONDUCTOR CASING VERIFIED BY OBSERVING CEMENT RETURNS, OR IS AN ADDITIONAL QUANTITY OF CEMENT USED TO ENSURE THE SPACE IS FILLED BACK TO THE MUD LINE?

Authority: 421(b)

Enforcement Action: W/S

Note: The bottom of a glory hole or the surface of an artificial island are acceptable substitutes for the mud line.

INSPECTION PROCEDURE:

1. Check records to verify that cement returns were observed.

2. If possible, observe the cement returns.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if operations are not in progress and:

1. Records do not indicate that returns were observed at the mud line.

2. Sufficient quantities of cement were not used.

Issue a rig shut-in (S) INC if operations are in progress, cement returns were not observed, and an additional quantity of cement was not used to assure fill to the mud line.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-157

IS SURFACE CASING CEMENTED WITH A QUANTITY OF CEMENT THAT FILLS THE CALCULATED ANNULAR SPACE TO AT LEAST 200 FEET INSIDE THE CONDUCTOR CASING (OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER)?

Authority: 421(c)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Check records to verify that sufficient quantities of cement were used to fill the annular space to at least 200 feet inside the conductor casing.
2. When geologic conditions such as near-surface fractures and faulting exist, verify that surface casing is cemented with a quantity of cement that fills the calculated annular space to the mud line, or as approved or prescribed by the District Manager.
3. For floating drilling operations, a lesser volume of cement may be used to prevent sealing the annular space between the conductor casing and surface casing if the District Manager determines that the uncemented space is necessary to provide protection from burst and collapse pressures which may be applied inadvertently to the annulus between casings during blowout preventer (BOP) testing operations.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if insufficient quantities of cement were used and the casing shoe has been drilled out.

Issue a rig shut-in (S) INC if the shoe has not been drilled out and records indicate that insufficient quantities of cement were used to fill the annular space to at least 200 feet inside the conductor casing.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-158

HAVE THE SURFACE, INTERMEDIATE, AND PRODUCTION CASINGS BEEN PRESSURE TESTED TO 70 PERCENT OF THE MINIMUM INTERNAL YIELD PRESSURE OF THE CASING, AND HAS THE CONDUCTOR CASING BEEN TESTED TO A MINIMUM OF 200 PSI FOR 30 MINUTES, WITH NO MORE THAN 10 PERCENT PRESSURE DROP DURING THE TESTS, OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER?

Authority: 423

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Inspect the on-site records from the previous inspection to the current inspection date to verify that proper casing pressure tests have been performed.
2. Verify remedial action taken if pressure declines more than 10 percent in 30 minutes or if there were other indications of leaks.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the Operator has performed a remedial test after drilling out the shoe.

Issue a rig shut-in (S) INC if the Operator has drilled out the shoe and not performed a test.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each casing string inspected

D-159

ARE ALL CASING AND LINER PRESSURE TESTS RECORDED ON A CHART CERTIFIED (SIGNED AND DATED) BY THE ONSITE REPRESENTATIVE WITH THE TIME, DATE, AND RESULTS?

Authority: 426

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that required pressure tests are recorded on a chart certified as correct.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC for each casing string pressure test, including liner tests, not recorded as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each casing string inspected

D-160

IS EACH PRODUCTION LINER (AND LINER-LAP) TESTED TO A MINIMUM OF 500 PSI ABOVE FORMATION FRACTURE PRESSURE AT THE SHOE OF THE CASING INTO WHICH THE LINER IS LAPPED (OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER)?

Authority: 425(b)

Enforcement Action: W/S

INSPECTION PROCEDURE:

Inspect on-site records from the previous inspection to the current inspection date to verify that pressure tests have been performed on the production liners that are set. Verify by witnessing actual liner seal tests if performed during inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC for previous liner seal test not performed or when proper tests cannot be conducted. Issue a rig shut-in (S) INC, if present when testing the liner lap, and the test was to less than 500 psi or was otherwise unacceptable.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-161

IS THE DRILLING LINER (AND LINER LAP) TESTED TO A PRESSURE AT LEAST EQUAL TO THE ANTICIPATED PRESSURE TO WHICH IT WILL BE SUBJECTED DURING THE FORMATION PRESSURE INTEGRITY TEST BELOW THAT LINER SHOE OR SUBSEQUENT LINER SHOE IF SET?

Authority: 425(a)

Enforcement Action: W/S

425(c)

INSPECTION PROCEDURE:

1. Inspect on-site records from the previous inspection to the current inspection date to verify that pressure tests have been performed on the drilling liners that are set. Verify by witnessing actual liner seal tests if performed during inspection.
2. If the test indicated an improper seal, verify that remedial action was taken to provide a proper seal as demonstrated by a satisfactory pressure test.
3. Check records to determine whether or not the District Manager has approved or required other tests.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if drilling has not commenced and proper tests cannot be conducted.

Issue a rig shut-in (S) INC if further drilling has commenced and:

1. Liner seal test was not performed.
2. Remedial action has not been taken if seal is improper.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-163

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

Authority: 424(a)

Enforcement Action: W/S

424(b)

DEFINITION:

Prolonged operations - Operations that may cause wear or damage to the casing such as milling, fishing, jarring, or washing over.

30 days - 30 working days. Downtime does not count toward the limit.

INSPECTION PROCEDURE:

Inspect records to determine if casing evaluations are being performed during prolonged operations.

Note: The following are required:

1. Caliper or pressure test the casing.
2. Reporting the results of the evaluation to the District Manager and obtaining approval of the results before resumption of operations.
3. If casing integrity has deteriorated to a level below minimum safety factors, has:
 - A. The casing been repaired or another casing string run.
 - B. Approval been obtained from the District Manager before repairs were begun.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate casing was not evaluated during a 30-day period of prolonged operations and a subsequent evaluation has been performed.

Issue a rig shut-in (S) INC if prolonged operations are in progress and 30 days have elapsed since the casing has been evaluated.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-164

AFTER CEMENTING CASING (OR LINERS), WAS THE CEMENT HELD UNDER PRESSURE FOR THE REQUIRED LENGTH OF TIME?

Authority: 422(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect on-site records of all strings of casing set from the previous inspection date to the current inspection date to verify waiting-on-cement (WOC) time. WOC time may be verified by computing the time interval from the time cement was placed to the time the casing shoe was drilled out. The following minimum requirements must be met:

1. Conductor 8 hours.
2. All others 12 hours.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC for each incident where WOC time failed to meet minimum requirements.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-165

WERE CEMENTING JOBS CONDUCTED AS DESIGNED SO THAT CEMENT COMPOSITION, PLACEMENT TECHNIQUES, AND WAIT TIMES ENSURE THAT THE CEMENT PLACED BEHIND THE BOTTOM 500 FEET OF CASING ATTAINS A MINIMUM COMPRESSIVE STRENGTH OF 500 PSI BEFORE DRILLING OUT OF THE CASING OR BEFORE COMMENCING COMPLETION OPERATIONS?

Authority: 420(c)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect on site records of all casing strings set from the previous inspection to the present to verify that cementing jobs were conducted as designed.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC for each incident where the cementing job was not conducted as designed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-166

IS THE INTERMEDIATE CASING CEMENTED WITH AT LEAST A MINIMUM AMOUNT OF CEMENT TO FILL THE ANNULAR SPACE 500 FEET ABOVE THE CASING SHOE AND 500 FEET ABOVE EACH ZONE TO BE ISOLATED?

Authority: 421(d)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect on site records to verify that the intermediate casing was cemented with the required amount of cement.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC for each incident where the required amount of cement was not utilized.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-167

IF A LINER IS USED AS CONDUCTOR OR SURFACE CASING, IS THE TOP OF THE LINER SET AT LEAST 200 FEET ABOVE THE PREVIOUS CASING/LINER SHOE?

Authority: 421(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect on site records to verify that liners are set as required.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC for each incident where the liner was not set as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-168 **IF A LINER IS USED AS AN INTERMEDIATE STRING BELOW A SURFACE STRING, OR PRODUCTION STRING BELOW AN INTERMEDIATE STRING, IS THE TOP OF THE LINER SET AT LEAST 100 FEET ABOVE THE PREVIOUS CASING STRING SHOE?**
Authority: 421(f) **Enforcement Action:** W
INSPECTION PROCEDURE:
Inspect on-site records to verify that liners are set as required.
IF NONCOMPLIANCE EXISTS:
Issue a warning (W) INC for each incident where the liner was not set as required.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC for each well inspected

D-169 **IS ENOUGH CEMENT USED TO COVER OR ISOLATE ALL HYDROCARBON BEARING ZONES, AT LEAST 500 FEET OF ANNULAR SPACE ABOVE THE CASING SHOE AND 500 FEET ABOVE THE UPPERMOST HYDROCARBON BEARING ZONE?**
Authority: 421(e) **Enforcement Action:** W
INSPECTION PROCEDURE:
Inspect on site records to verify that enough cement was utilized.
IF NONCOMPLIANCE EXISTS:
Issue a warning (W) INC for each incident where enough cement was not utilized.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC for each well inspected

D-170 **IF THE DIVERTER OR BOP ARE NIPPLED DOWN DURING THE WAITING PERIOD FOR CEMENTING, HAS IT BEEN DETERMINED SAFE TO DO SO BEFORE NIPPLING DOWN?**
Authority: 422(b) **Enforcement Action:** W
Note: Determination must be based on a knowledge of formation conditions, cement composition, effects of nippleing down, presence of potential drilling hazards, well conditions, cementing, and experience.
INSPECTION PROCEDURE:
Review records.
IF NONCOMPLIANCE EXISTS:
Issue a warning (W) INC if the waiting period is deemed insufficient.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC for each well inspected

D-171 **IF THE CASING SETTING DEPTHS ARE MORE THAN 100 FEET TVD FROM THE DEPTH APPROVED IN THE APD, HAS THE CHANGE BEEN APPROVED BY THE DISTRICT MANAGER?**
Authority: 428(b) **Enforcement Action:** W/S
INSPECTION PROCEDURE:
Inspect on-site records to verify that casings are set as approved.
IF NONCOMPLIANCE EXISTS:
Issue a warning (W) INC if the casing was set deeper without approval.
Issue a rig shut-in (S) INC if drilling has continued deeper than approved.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC for each well inspected

D-172 **WERE REMEDIAL ACTIONS, APPROVED BY THE DISTRICT MANAGER, TAKEN IF THERE WERE INDICATIONS OF AN INADEQUATE CEMENTING JOB?**
Authority: 428(c) **Enforcement Action:** W
428(d)
Note: Methods to determine an inadequate cementing job are:
1. Pressure test the casing shoe.
2. Run a temperature survey.
3. Run a cement bond log.
4. Use a combination of these techniques.
INSPECTION PROCEDURE:
Inspect on-site records to verify that an adequate remedy was utilized.
IF NONCOMPLIANCE EXISTS:
Issue a warning (W) INC if an inadequate remedy was utilized.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC for each well inspected

D-173

WAS REMEDIAL ACTION TAKEN IF THE PRIMARY CEMENT JOB DID NOT ISOLATE ABNORMAL PRESSURE INTERVALS?

Authority: 428(e)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect on-site records to verify that proper remedial action was taken.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the proper remedial action was not taken.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-175

IS CEMENT THAT SETS BEFORE IT FREEZES, AND THAT HAS A LOW HEAT OF HYDRATION, USED TO CEMENT ACROSS A PERMAFROST ZONE?

Authority: 428(i)

Enforcement Action: W

INSPECTION PROCEDURE:

Inspect on-site records to verify that the proper cement was utilized.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the proper cement was not utilized.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

BOP SYSTEMS AND COMPONENTS

D-200 DOES THE WORKING-PRESSURE RATING OF ALL BOP COMPONENTS EXCEED THE MASP TO WHICH THEY MAY BE SUBJECTED?

Authority: 440

Enforcement Action: S

INSPECTION PROCEDURE:

Check APD and approved plans for verification of MASP and working pressure components of BOP systems.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) if the working pressure rating of BOP components does not exceed the MASP to which the components are subjected, with the exclusion of the annular preventer.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected.

D-201 DOES THE ACCUMULATOR SYSTEM PROVIDE SUFFICIENT CAPACITY TO SUPPLY 1.5 TIMES THE VOLUME OF FLUID NECESSARY TO CLOSE AND HOLD CLOSED ALL BOP SYSTEM COMPONENTS WITH A MINIMUM PRESSURE OF 200 PSI ABOVE THE PRECHARGE PRESSURE WITHOUT ASSISTANCE FROM A CHARGING SYSTEM?

Authority: 441(c)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify that the BOP actuating system which is installed is in compliance with that which has been approved.

2. Witness the proper automatic operation of the charging system.

3. Check the system for leaks.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when an operable accumulator system of sufficient capacity is not installed.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected.

D-202 HAVE ACCUMULATOR REGULATORS, SUPPLIED BY RIG AIR AND WITHOUT A SECONDARY SOURCE OF PNEUMATIC SUPPLY, BEEN EQUIPPED WITH MANUAL OVERRIDES OR OTHER DEVICES PROVIDED TO ENSURE CAPABILITY OF HYDRAULIC OPERATIONS IF RIG AIR IS LOST?

Authority: 441(c)

Enforcement Action: S

INSPECTION PROCEDURE:

Visually check to see if the accumulator unit is equipped with a fail safe pneumatically operated regulator or a manually operated regulator to ensure uninterrupted functional capability.

IF NONCOMPLIANCE EXISTS:

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

1. A manual override is not installed on the air operated regulator, or

2. The regulator is not equipped with a secondary source of air.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected.

D-203 IS AN AUTOMATIC BACKUP ACCUMULATOR-CHARGING SYSTEM, SUPPLIED BY A POWER SOURCE INDEPENDENT FROM THE POWER SOURCE TO THE PRIMARY ACCUMULATOR-CHARGING SYSTEM, AND POSSESSING SUFFICIENT CAPABILITY TO CLOSE ALL BOP COMPONENTS AND HOLD THEM CLOSED, PROVIDED?

Authority: 443(a)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify that the backup system is supplied by an independent power source.

2. Witness operation of the accumulator backup system and verify that the backup system automatically charges the accumulators.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when an operable automatic accumulator back-up system is not installed.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected.

D-204 **IS AT LEAST ONE OPERABLE REMOTE BOP CONTROL STATION, IN ADDITION TO THE ONE ON THE DRILLING FLOOR, PROVIDED IN A READILY ACCESSIBLE LOCATION AWAY FROM THE DRILLING FLOOR?**
Authority: 443(b) **Enforcement Action:** S
INSPECTION PROCEDURE:
1. Verify that a readily accessible remote BOP control station is installed.
2. Witness the operation of the remote station, or inspect control panel gauge for presence of operating control pressure.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC when an operable remote BOP control station is not installed.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per station inspected

D-205 **IS A DRILLING SPOOL WITH SIDE OUTLETS PROVIDED IF SIDE OUTLETS ARE NOT PROVIDED IN THE BODY OF THE BOP STACK TO PROVIDE FOR SEPARATE KILL AND CHOKE LINES?**
Authority: 443(c) **Enforcement Action:** S
INSPECTION PROCEDURE:
Visually confirm that side outlets are provided for separate choke and kill lines.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC when separate choke and kill line outlets and lines are not installed.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per BOP system inspected

D-207 **IS EACH CHOKE AND KILL LINE EQUIPPED WITH TWO FULL OPENING VALVES, WITH AT LEAST ONE REMOTE CONTROLLED VALVE FOR SURFACE AND ALL REMOTE CONTROLLED VALVES FOR SUBSEA?**
Authority: 443(d) **Enforcement Action:** S
INSPECTION PROCEDURE:
1. Visually inspect the choke and kill lines to determine if they are each equipped with at least one remotely-controlled valve.
2. Exception 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 rig shut-in (S) INC if the choke and kill lines are not each equipped with at least one remotely-controlled valve or as excepted above.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC for each line inspected.

D-208 **IS A FILL-UP LINE INSTALLED ABOVE THE UPPERMOST BOP?**
Authority: 443(e) **Enforcement Action:** S
INSPECTION PROCEDURE:
Verify that the fill-up line is installed above the uppermost BOP. Kill lines are not acceptable as fill-up lines.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC when a fill-up line has not been installed above the uppermost BOP.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per BOP system inspected

D-209

DO THE CHOKE MANIFOLD COMPONENTS HAVE A RATED WORKING PRESSURE AT LEAST AS GREAT AS THE RATED WORKING PRESSURE OF THE RAM-TYPE BOP'S?

Authority: 444(b)

Enforcement Action: S

INSPECTION PROCEDURE:

Visually check rated working pressure of the equipment and check APD and rig manual to confirm the choke equipment rated working pressure is as great as the ram-type BOP's rated working pressure.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if the choke manifold and related equipment have a rated working pressure less than the rated working pressure of the ram-type BOP's.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-210

ARE ALL COMPONENTS OF THE CHOKE MANIFOLD SYSTEM SUITABLE FOR THE APPLICATION IN WHICH THOSE COMPONENTS WILL BE USED?

Authority: 444(a)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Visually check location of choke manifold system to confirm it is in a heated area.
2. Check records to determine if choke manifold system has been bled.
3. Check records to determine what type of antifreeze fluid is used, if any.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if the components of the choke manifold system are not protected by heating, draining, or filling with proper fluids as described above.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-211

IF BUFFER TANKS ARE INSTALLED DOWNSTREAM OF THE CHOKE ASSEMBLIES FOR THE PURPOSE OF MANIFOLDING THE BLEED LINES TOGETHER, ARE ISOLATION VALVES INSTALLED ON EACH LINE?

Authority: 444(b)

Enforcement Action: S

INSPECTION PROCEDURE:

Visually check to confirm that isolation valves are installed between choke assemblies and buffer tank.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if isolation valves are not installed on each line.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-212

DO VALVES, PIPES, FLEXIBLE STEEL HOSES, AND OTHER FITTINGS UPSTREAM OF THE CHOKE MANIFOLD HAVE PRESSURE RATINGS AT LEAST AS GREAT AS THE RATED WORKING PRESSURE OF THE RAM-TYPE BOP'S?

Authority: 444(c)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify that affected equipment has a rated working pressure at least equal to the rated pressure of the ram-type BOP's.
2. Visually inspect the affected equipment to verify the pressure rating.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when valves, pipes, flexible steel hoses, and other fittings upstream of and including the choke manifold do not have a pressure rating at least equal to the rated working pressure of the ram-type BOP's.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

- D-213** **IS WELLHEAD ASSEMBLY WITH A RATED WORKING PRESSURE THAT EXCEEDS THE MASP INSTALLED?**
Authority: 443(g) **Enforcement Action:** S
INSPECTION PROCEDURE:
Check APD to determine if the rated working pressure of the wellhead assembly is greater than the MASP.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC if the rated working pressure of the wellhead assembly is less than the MASP.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per well inspected.
-
- D-214** **IS A FULL-OPENING KELLY VALVE INSTALLED BELOW THE SWIVEL (UPPER KELLY VALVE)?**
Authority: 445(a) **Enforcement Action:** S
 445(h)
INSPECTION PROCEDURE:
Verify that the upper kelly valve is installed and operable.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC when an operable upper kelly valve has not been installed.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per BOP system inspected
-
- D-215** **IS A FULL-OPENING, STRIPPABLE, KELLY VALVE INSTALLED AT THE BOTTOM OF THE KELLY (LOWER KELLY VALVE)?**
Authority: 445(b) **Enforcement Action:** S
 445(h)
INSPECTION PROCEDURE:
Verify that the lower kelly valve is installed and operable.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC when an operable lower kelly valve has not been installed.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per BOP system inspected
-
- D-216** **WITH A MUD MOTOR IN SERVICE AND WHILE USING DRILL PIPE IN LIEU OF A KELLY, IS ONE KELLY VALVE LOCATED ABOVE AND ONE STRIPPABLE KELLY VALVE LOCATED BELOW THE JOINT OF DRILL PIPE EMPLOYED IN LIEU OF A KELLY?**
Authority: 445(c) **Enforcement Action:** S
INSPECTION PROCEDURE:
Visually check to confirm that both an upper and lower kelly valve are installed.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC if either kelly valve is not installed.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC for each kelly valve inspected.
-
- D-217** **ON A TOP-DRIVE SYSTEM EQUIPPED WITH A REMOTE-CONTROLLED VALVE, IS A STRIPPABLE KELLY VALVE INSTALLED BELOW THE REMOTE-CONTROLLED VALVE?**
Authority: 445(d) **Enforcement Action:** S
INSPECTION PROCEDURE:
Visually check to confirm that both the upper remote-controlled and the lower kelly valves are installed on a top drive system.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC if both kelly valves are not installed.
INSPECTION COUNT/ INC COUNT
Enter one item checked/ issue one INC per BOP system inspected
-

SURFACE BOP SYSTEM

D-231 **IF A REMOTE-CONTROLLED VALVE IS NOT INSTALLED IN THE KILL LINE, ARE BOTH MANUAL VALVES READILY ACCESSIBLE AND IS THE CHECK VALVE INSTALLED BETWEEN THE MANUAL VALVES AND THE PUMP?**

Authority: 443(d)(3)

Enforcement Action: S

Note: Surface BOP systems only.

INSPECTION PROCEDURE:

If a check valve is used in lieu of a remote-controlled valve in the kill line, visually confirm that:

1. Two readily accessible manual valves are in place, and
2. The check valve is placed between the two manual valves and the pump.

IF NONCOMPLIANCE EXISTS:

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

1. The two manual valves are not in place, or
2. The check valve is not placed between the outer manual valve and the pump.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-232 **PRIOR TO DRILLING BELOW SURFACE CASING, IS A BOP SYSTEM INSTALLED CONSISTING OF AT LEAST FOUR REMOTE-CONTROLLED, HYDRAULICALLY-OPERATED BOP'S INCLUDING AT LEAST TWO EQUIPPED WITH PIPE RAMS, BLIND-SHEAR RAMS, AND ONE ANNULAR TYPE?**

Authority: 441(a)

Enforcement Action: S

INSPECTION PROCEDURE:

If surface casing has been set, verify that the required BOP system has been installed.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when the required BOP system has not been installed.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

SUBSEA BOP SYSTEMS

D-240 **PRIOR TO DRILLING BELOW SURFACE CASING WITH A SUBSEA STACK, ARE THERE AT LEAST FOUR REMOTE-CONTROLLED, HYDRAULICALLY-OPERATED BOP'S, INCLUDING AT LEAST TWO EQUIPPED WITH PIPE RAMS, ONE WITH BLIND-SHEAR RAMS, AND ONE ANNULAR TYPE?**

Authority: 442(a)

Enforcement Action: S

442(b)

INSPECTION PROCEDURE:

If surface casing has been set, verify that the required BOP system has been installed.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when a required, approved, and operable BOP system is not installed.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-241 **IS THE ACCUMULATOR CLOSING SYSTEM, TO PROVIDE FAST CLOSURE OF THE BOP COMPONENTS AND TO OPERATE ALL CRITICAL FUNCTIONS IN CASE OF A LOSS OF THE POWER FLUID CONNECTION TO THE SURFACE, INSTALLED IN ACCORDANCE WITH API RP 53?**

Authority: 198

Enforcement Action: C

442(c)

INSPECTION PROCEDURE:

1. Verify that the BOP stack is equipped with accumulator bottles.
2. Verify that the BOP Rams close with in 45 seconds.
3. Verify that the Annular BOPS close with in 60 seconds.
4. Verify that the operating response time for the choke and kill valves (either open or closed) does not exceed the minimum observed BOP Ram close response time.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC if the accumulator closing system cannot operate the specified equipment within the specified time.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-242

DOES THE BOP SYSTEM INCLUDE OPERABLE DUAL-POD CONTROL SYSTEMS TO ENSURE PROPER AND INDEPENDENT OPERATION?

Authority: 442(d)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify that a dual pod control system has been installed as follows:
 - A. Two completely redundant control pods.
 - B. Each pod contains all necessary valves and regulators to operate the BOP stack functions.
2. Conditions permitting, witness a function test of each pod to verify proper actuation.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when an operable dual pod control system has not been installed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-243

DO THE RECORDS INDICATE THAT THE GLORY HOLE IS AT THE APPROVED DEPTH TO ENSURE THAT THE TOP OF THE STACK IS BELOW THE DEEPEST PROBABLE ICE-SCOUR DEPTH?

Authority: 451(h)

Enforcement Action: S

INSPECTION PROCEDURE:

Check records to ensure that the glory hole is at the approved depth.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if the glory hole has not been excavated to the approved depth.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected.

D-244

IS THE MARINE RISER DISPLACED WITH SEA WATER PRIOR TO REMOVAL?

Authority: 442(e)

Enforcement Action: W

Note: Sufficient hydrostatic pressure must be maintained or other suitable precautions must be taken to compensate for the reduction in pressure and to maintain a safe and controlled well condition.

INSPECTION PROCEDURE:

Verify that the riser was properly displaced before removal.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate the riser was not displaced with seawater.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

BOP TESTS, ACTUATORS, INSPECTIONS, AND MAINTENANCE

DEFINITION:

BOP System and Auxiliary Equipment - See Appendix 23

D-250

HAVE ALL BOP SYSTEM COMPONENTS BEEN SUCCESSFULLY TESTED TO A LOW PRESSURE OF 200 PSI TO 300 PSI PRIOR TO CONDUCTING HIGH-PRESSURE TESTS?

Authority: 448(a)

Enforcement Action: W/S

Note: If the initial pressure exceeds 500 psi, you must bleed back to zero and re-initiate the test.

INSPECTION PROCEDURE:

1. Verify that a low-pressure test on BOP equipment was conducted prior to a high-pressure test and that the test was conducted in accordance with the specified requirements. (see Appendix 23).
2. If inspection is being performed during commencement of testing of BOP system, confirm operator's compliance with low-pressure testing requirements.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if a low-pressure test was missed, but subsequently performed.

Issue a rig shut-in (S) INC when records indicate a low-pressure test was not performed prior to a high-pressure test and/or the test was not performed as required (see Appendix 23).

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-251

ARE RAM-TYPE BOP'S, CHOKE MANIFOLD, AND OTHER BOP EQUIPMENT PRESSURE TESTED TO A PRESSURE EQUAL TO THE RATED WORKING PRESSURE OF THE EQUIPMENT OR TO A PRESSURE APPROVED IN THE APD?

Authority: 448(b)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Verify that all BOP components were tested to the rated working pressure of the equipment.
2. If inspection is performed during testing, confirm Operator's compliance by witnessing the pressure tests.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the records indicate that a test was missed, but a subsequent test was conducted.

Issue a rig shut-in (S) INC if the required tests have not been conducted.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-252

ARE SAFETY VALVES ACTUATED PRIOR TO RUNNING CASING AND RECORDED IN THE DRILLER'S REPORT?

Authority: 449(i)

Enforcement Action: W

450

Note: A low torque valve attached to a swedge with compatible connections is acceptable.

INSPECTION PROCEDURE:

1. Visually witness actuation of safety valves prior to running casing, or
2. Inspect records to ensure the valve was actuated.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that safety valves are not actuated prior to the casing being run.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-253

ARE SURFACE AND SUBSEA BOP SYSTEMS PRESSURE TESTED BETWEEN WELLS, BEFORE DRILLING OUT EACH STRING OF CASING OR LINER, OR AS OTHERWISE APPROVED BY THE DISTRICT MANAGER?

Authority: 447(c)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Inspect driller's report to verify that the tests were conducted between wells, before drilling out after each string of casing or liner.
2. If tests are performed during inspection, witness the tests.

Note: This test can be omitted if approved in the APD.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the BOP Systems are not tested between wells or the casing shoe has been drilled out without testing and subsequent tests were performed.

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

1. Casing has been set and Operator is preparing to drill out without performing tests.
2. A subsequent test has not been performed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-254

WHEN THE BOP TESTS ARE POSTPONED DUE TO WELL CONTROL PROBLEMS, IS THE BOP TEST PERFORMED ON THE FIRST TRIP OUT OF THE HOLE AND ARE THE SPECIFIC REASONS FOR POSTPONING THE TESTING RECORDED IN THE DRILLER'S REPORT?

Authority: 451(c)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Check driller's report to determine why tests were postponed.
2. Valid reasons for postponing pressure tests include:
 - A. Lost circulation.
 - B. Formation fluid influx.
 - C. Stuck drill pipe.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if reason for postponing tests was not entered in driller's report.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each well inspected

D-256

ARE ANNULARS AND RAM BOP'S FUNCTION TESTED EVERY 7 DAYS BETWEEN PRESSURE TESTS?

Authority: 449(h)

Enforcement Action: W/S

Note: Approval may be obtained not to function test blind rams if no trip is performed between tests.

INSPECTION PROCEDURE:

1. Verify that annular and ram BOP's have been function tested every 7 days between pressure tests.
2. Inspect function test if performed during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if function test was not conducted, but subsequent function test was conducted.

Issue a rig shut-in (S) INC if annular and rams have not been function tested in the past 7 days.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-257

ARE VARIABLE-BORE PIPE RAMS PRESSURE-TESTED AGAINST THE LARGEST AND SMALLEST SIZES OF PIPE IN USE, EXCLUDING DRILL COLLARS AND BOTTOM-HOLE TOOLS?

Authority: 449(f)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. If inspection is performed during testing, confirm operator compliance by witnessing test.
2. Inspect records for verification that tests have been conducted.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if past test has not been conducted but a subsequent test has been conducted.

Issue a rig shut-in (S) INC if test has not been conducted.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-262

IS THE TEST INTERVAL FOR EACH BOP COMPONENT TESTED FOR A MINIMUM OF 5 MINUTES, 3 MINUTES ON THE OUTERMOST HALF OF A CHART, OR ON A DIGITAL RECORDER TO DEMONSTRATE THAT THE COMPONENT IS HOLDING PRESSURE?

Authority: 448(d)

Enforcement Action: W/S

INSPECTION PROCEDURE:

Verify that each BOP component held pressure for at least five minutes or other time periods specified by the regulations (see Appendix 23).

Note: For surface BOP systems and surface equipment of a subsea BOP system, a 3-minute test duration is acceptable if you record your test pressure on the outermost half of a 4-hour chart, on a 1-hour chart, or on a digital recorder.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the pressure charts or digital recorder indicates that each BOP component did not hold pressure as required but a subsequent test was performed.

Issue a rig shut-in (S) INC if the test requirements were not met on the last test.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-263

ARE BOP TEST PRESSURE CHARTS CERTIFIED (SIGNED AND DATED) AS CORRECT BY THE OPERATOR'S REPRESENTATIVE AT THE FACILITY?

Authority: 450(b)

Enforcement Action: W

DEFINITION:

Operator's Representative - The person or persons selected by the Designated Lease Operator to supervise their operations and represent them on any decisions required of said Operators.

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 rig.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-264

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

Authority: 450(c)

Enforcement Action: W

INSPECTION PROCEDURE:

Check the driller's report 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 COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-265

IS THE CONTROL STATION OR POD USED DURING THE BOP SYSTEM TESTING IDENTIFIED IN THE DRILLER'S REPORT OR REFERENCED DOCUMENTS?

Authority: 450(c)
450(d)

Enforcement Action: W

INSPECTION PROCEDURE:

Check the driller's report or referenced document to verify that the control station used during the BOP system testing is identified.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the control station used during the BOP system testing is not identified in the driller's report or referenced document.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-266

ARE ANY PROBLEMS OR IRREGULARITIES OBSERVED DURING BOP SYSTEM TESTING IDENTIFIED AND THE ACTIONS TAKEN TO REMEDY SUCH PROBLEMS OR IRREGULARITIES RECORDED?

Authority: 450(c)
450(e)

Enforcement Action: W

INSPECTION PROCEDURE:

Check the driller's report or referenced document to verify that problems or irregularities observed during BOP system testing and actions taken to remedy such problems or irregularities are recorded.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if problems or irregularities observed during the testing of BOP system and actions taken to remedy such problems or irregularities are not recorded in the driller's report or referenced documents.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-267

ARE ALL RECORDS INCLUDING PRESSURE CHARTS, DRILLER'S REPORT, AND REFERENCED DOCUMENTS OF BOP TESTS, ACTUATIONS, AND INSPECTIONS AVAILABLE AT THE FACILITY FOR THE DURATION OF THE DRILLING ACTIVITY?

Authority: 450(c)
450(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that all records including pressure charts, driller's report, and referenced documents of BOP tests, actuation, and inspections are available at the facility for the duration of the drilling activity.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if all records of BOP tests, actuation, and inspections including pressure charts, driller's report, and referenced documents are not available at the facility for the duration of the drilling activity.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-268

ARE ALL RECORDS RELATING TO CASING AND LINER PRESSURE TESTS, DIVERTER TESTS, AND BOP TESTS RETAINED FOR A PERIOD OF TWO YEARS AFTER COMPLETION OF THE DRILLING OPERATIONS?

Authority: 467(b)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that all such records are available, during entire drilling operation.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the records are not available.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

D-269

ARE BLIND OR BLIND-SHEAR RAMS TESTED DURING A STUMP TEST AND AT ALL CASING POINTS WITHOUT EXCEEDING 30 DAYS BETWEEN TESTS?

Authority: 449(d)
449(e)

Enforcement Action: W/S

INSPECTION PROCEDURE:

Verify test records and charts indicate that test was performed.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the test was not performed when required, but a subsequent test was performed.

Issue a rig shut-in (S) INC if the test was not performed when required, nor was a subsequent test performed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection.

.

SURFACE BOP TESTS

D-270

ARE BOP SYSTEMS PRESSURE TESTED WHEN INSTALLED?

Authority: 447(a)

Enforcement Action: W/S

DEFINITION:

BOP system and auxiliary equipment - See Appendix 23

INSPECTION PROCEDURE:

1. Verify that required tests were performed when BOP system and auxiliary equipment were installed.
2. If inspection is being performed when initial testing of BOP's and auxiliary equipment is in progress, witness the tests.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when drilling operations have commenced without the initial tests and subsequent tests have been performed.

Issue a rig shut-in (S) INC when installation has been accomplished, the initial tests have not been performed, drilling operations have commenced, and a subsequent test has not been performed.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-271

IS THE SURFACE BOP SYSTEM PRESSURE TESTED WITH WATER?

Authority: 449(a)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Verify that the BOP system was tested with water.
2. Witness BOP system testing if present.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if BOP system was not tested with water, but a subsequent test with water was performed.

Issue a rig shut-in (S) INC if BOP was tested with a fluid other than water.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-272

IS THE ANNULAR-TYPE BOP PRESSURE TESTED WITH WATER TO 70 PERCENT OF ITS RATED WORKING PRESSURE?

Authority: 448(c)

Enforcement Action: W/S

449(a)

INSPECTION PROCEDURE:

1. Determine rated working pressure of BOP's and minimum internal yield pressure of casing.
2. Verify that pressure tests have been performed on annular-type BOP's at 70 percent of rated working pressure or as otherwise approved in the APD.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when records indicate that previous test(s) did not meet minimum requirements but were later met by subsequent tests.

Issue a rig shut-in (S) INC when the annular-type BOP's have not been tested as required.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-273

ARE SURFACE BOP SYSTEMS PRESSURE TESTS BEGUN BEFORE 14 DAYS HAVE ELAPSED

SINCE THE LAST BOP PRESSURE TEST WAS COMPLETED, ALTERNATING BETWEEN CONTROL STATIONS?

Authority: 447(b)
449(c)

Enforcement Action: W/S

DEFINITION:

BOP system and auxiliary equipment - See Appendix 23

Note: A 14-day pressure test is not required for blind and blind shear rams.

INSPECTION PROCEDURE:

1. Inspect driller's report to verify that tests were begun before 14 days had elapsed since the last BOP pressure test was completed.
2. All control stations must be functional. Operations permitting, witness proper operation of stations.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when records indicate that tests other than most recent tests exceeded the 14-day interval requirement without acceptable explanation in driller's report.

Issue a rig shut-in (S) INC when date of most recent tests exceeds 14 days or if a control station is inoperable.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-274

ARE THE BONNET SEALS TESTED BEFORE RUNNING THE CASING WHEN CASING RAMS ARE INSTALLED IN THE BOP STACK?

Authority: 451(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the bonnet seals were tested.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if bonnet seals were not tested.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

SUBSEA BOP TESTS

D-281

ARE SUBSEA BOP SYSTEM COMPONENTS STUMP PRESSURE TESTED AT THE SURFACE WITH WATER TO THEIR RATED WORKING PRESSURE?

Authority: 449(b)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Verify that required tests were performed prior to installation.
2. If inspection is being performed when stump tests are being conducted, witness the tests as conditions and time permit.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the BOP was not stump tested prior to commencing drilling operations.

Issue a rig shut-in (S) INC when installation of the BOP stack on the seafloor has commenced, drilling operations have not begun, and the BOP has not been stump tested.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-282

ARE SUBSEA ANNULAR-TYPE BOP'S STUMP PRESSURE TESTED AT THE SURFACE WITH WATER TO 70 PERCENT OF THEIR RATED WORKING PRESSURE OR TO THE PRESSURE IN THE APPROVED APD?

Authority: 448(c)
449(b)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Verify that required tests were performed prior to installation.
2. If inspection is being performed when stump tests are being conducted, witness the tests as conditions and time permit.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the BOP was not stump tested prior to commencing drilling operations.

Issue a rig shut-in (S) INC when installation of the BOP stack on the seafloor has commenced, drilling operations have not begun, and the BOP has not been stump tested.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-283

WAS THE SUBSEA BOP STACK PRESSURE TESTED AFTER INSTALLATION?

Authority: 447(a)
448(c)

Enforcement Action: W/S

Note: Annular tested to 70 percent of the rated working pressure or to the pressure in the approved APD.

INSPECTION PROCEDURE:

1. Verify that required tests were performed.
2. If inspection is being performed when initial testing of BOP stack is in progress, witness the tests.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when drilling operations commenced prior to required test but subsequent tests have been performed.

Issue a rig shut-in (S) INC when installation has been accomplished, the initial tests have not been performed, drilling operations have commenced, and subsequent tests have not been performed.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

D-285

ARE BOP SYSTEMS PRESSURE TESTING BEGUN BEFORE 14 DAYS HAVE ELAPSED SINCE THE LAST BOP TEST, ALTERNATING BETWEEN CONTROL STATIONS AND PODS?

Authority: 447(b)
449(c)

Enforcement Action: W/S

DEFINITION:

BOP system and auxiliary equipment - See Appendix 23

INSPECTION PROCEDURE:

1. Verify that required tests were begun before 14 days between tests is exceeded, alternating between control stations and pods.
2. All control stations and pods shall be functional. Conditions permitting, witness operation of stations.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when records indicate tests other than most recent test exceeded the 14-day interval requirement without acceptable explanation in driller's report.

Issue a rig shut-in (S) INC when:

1. Date of most recent test exceeds 14 days and acceptable explanation is not entered in driller's report.
2. Either control station or pod is inspected and found to be inoperable.

INSPECTION COUNT/ INC COUNT

Enter one item checked/ issue one INC per BOP system inspected

WELL-CONTROL DRILLS

D-290

ARE WELL-CONTROL DRILLS CONDUCTED FOR EACH DRILLING CREW AND RECORDED IN THE DRILLER'S REPORT?

Authority: 462
462(c)

Enforcement Action: W

Note:

1. Well-control drills conducted:
 - A. Must be designed to acquaint each crew member with his function during a well-control operation so that each member can perform his/her assignment promptly and efficiently.
 - B. Must be performed at least once each week (well conditions permitting) with each crew.
 - C. Must include on-bottom, drilling, tripping, and diverter drills.
 - D. Refer to Appendix 22 for details of the contents of drilling and tripping drills.
2. After consulting with the Company Representative, MMS representative may require the Operator to conduct a well control drill.

INSPECTION PROCEDURE:

Verify that each crew has performed a well-control drill.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when well control drills have not been conducted as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-291

IS A COPY OF THE COMPLETE WELL-CONTROL DRILL PLAN POSTED ON THE RIG

FLOOR OR BULLETIN BOARD?

Authority: 462(a)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that a complete well-control plan has been posted on the rig floor and/or bulletin board.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when plan is not posted.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-292

ARE DRILLS CONDUCTED IN ACCORDANCE WITH THE WELL-CONTROL DRILL PLAN?

Authority: 462

Enforcement Action: W

462(a)

462(b)

DEFINITION:

Well-control drill plan - A document that is posted on the rig floor and/or bulletin board that is applicable to the particular site, and is prepared for each crew member outlining the assignments each is to fulfill during the drill, establishing a prescribed time for the completion of each member's portion of the drill.

INSPECTION PROCEDURE:

1. If a drill is performed during an inspection, observe the drill to verify that drill crew members carry out their assignments according to the well-control plan for the site.
2. Verify the time required for the crew to complete the drill is in accordance with the established time prescribed in the well-control plan.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when observed well control drills are not conducted according to the well-control plan.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

DIVERTER SYSTEMS

D-300

WHEN DRILLING A CONDUCTOR OR SURFACE HOLE, IS THE DRILLING UNIT EQUIPPED WITH A DIVERTER SYSTEM CONSISTING OF A DIVERTER SEALING ELEMENT, DIVERTER LINES, AND CONTROL SYSTEMS?

Authority: 430

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that the drilling unit is equipped with a diverter system consisting of a sealing element, diverter lines, and control systems.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if drilling unit is not equipped with diverter and related equipment.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per diverter system inspected.

D-301

IS THE DIVERTER SYSTEM EQUIPPED WITH FULL OPENING REMOTE-CONTROLLED VALVES IN THE FLOW AND VENT LINES THAT CAN BE OPERATED FROM AT LEAST ONE REMOTE-CONTROL STATION IN ADDITION TO THE ONE ON THE DRILLING FLOOR?

Authority: 431(c)

Enforcement Action: S

431(d)

INSPECTION PROCEDURE:

1. Inspect flow and vent lines for remotely-controlled valves.
2. Inspect flow and vent lines to ensure that manual or butterfly valves are not installed in any part of the diverter system.
3. Inspect for a remote-control station in addition to the one on the drill floor.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if flow and vent lines do not have remotely-controlled valves that can be operated from a remote station.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per diverter system inspected.

- D-302** **ARE THE DIVERTER SEALING ELEMENT, DIVERTER VALVES, AND DIVERTER-CONTROL SYSTEMS, INCLUDING THE REMOTE-CONTROL SYSTEM, ACTUATION-TESTED AND THE VENT LINES FLOW TESTED WHEN INSTALLED?**
Authority: 433 **Enforcement Action:** W
INSPECTION PROCEDURE:
Inspect records to confirm that all diverter equipment is actuation-tested when initially installed.
IF NONCOMPLIANCE EXISTS:
Issue a warning (W) INC if records indicate that equipment has not been actuation-tested.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per diverter system inspected.
-
- D-305** **ARE ALL RIGHT-ANGLE AND SHARP TURNS IN THE DIVERTER LINES TARGETED?**
Authority: 431(e) **Enforcement Action:** S
DEFINITION:
Targeted - The building-up or reinforcing of a right-angle or sharp turn in a line where the fluid or solids in a fluid are likely to erode the upstream side of the turn.
INSPECTION PROCEDURE:
Verify that all right angle and sharp turns are targeted and surface diverter configurations do not have more than one right-angle turn per diverter spool outlet.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC if lines are not targeted and more than one right-angle turn per diverter spool outlet exists.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per diverter system inspected.
-
- D-306** **DOES FLEXIBLE HOSE USED FOR DIVERTER LINES HAVE INTEGRAL END COUPLINGS?**
Authority: 432(a) **Enforcement Action:** S
INSPECTION PROCEDURE:
1. Verify that flexible hose has integral end couplings.
2. Verify that the use of flexible hose for diverter lines is addressed in the approved APD.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC if:
1. Flexible hose is not equipped with integral end couplings.
2. Use of flexible hose was not approved by the District Manager.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per diverter system inspected.
-
- D-307** **IS THE ENTIRE DIVERTER SYSTEM ANCHORED AND SUPPORTED TO PREVENT WHIPPING AND VIBRATION?**
Authority: 431(f) **Enforcement Action:** S
INSPECTION PROCEDURE:
Verify that the diverter system is secured.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC if the diverter system is capable of vibration or whipping.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per diverter system inspected.
-
- D-308** **ARE ALL DIVERTER CONTROL INSTRUMENTS AND LINES PROTECTED FROM PHYSICAL DAMAGE FROM THROWN AND FALLING OBJECTS?**
Authority: 431(g) **Enforcement Action:** S
INSPECTION PROCEDURE:
Verify that diverter control instruments and lines are protected from damage from thrown or falling objects.
IF NONCOMPLIANCE EXISTS:
Issue a rig shut-in (S) INC if equipment is subject to any damage from thrown and falling objects.
INSPECTION COUNT/ INC COUNT:
Enter one item checked/ issue one INC per diverter system inspected.
-

ACTUATION, AND THE REMEDIES RECORDED IN THE DRILLER'S REPORT?

Authority: 434(d)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that problems, irregularities, and remedies are recorded.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if problems, irregularities, or remedies are not recorded.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-316

ARE PRESSURE CHARTS AND REPORTS PERTAINING TO THE DIVERTER TEST AND ACTUATIONS RETAINED AT THE RIG FOR THE DURATION OF DRILLING THE WELL?

Authority: 434(e)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that charts and reports are kept on the rig for the duration of drilling the well.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if charts and reports are not kept on the rig.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-317

IS THE DIVERTER SYSTEM DESIGNED, INSTALLED, USED, MAINTAINED AND TESTED TO ENSURE PROPER DIVERSION OF GASES, WATER, DRILLING FLUIDS AND OTHER MATERIALS AWAY FROM FACILITIES AND PERSONNEL BEFORE DRILLING CONDUCTOR OR SURFACE HOLE.

Authority: 30 CFR 250.430

30 CFR 250.198

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify that the Diverter actuating system which is installed is in compliance with that which has been approved.
2. Verify that the accumulator system provides sufficient capacity to close a diverter system that is installed before drilling conductor or surface hole.
3. Witness the proper automatic operation of the charging system.
4. Check the system for leaks.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when an operable accumulator system of sufficient capacity is not installed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked / issue one INC per Diverter system inspected.

<p>D-322</p>	<p>IS THE SPOOL OUTLET AND DIVERTER LINE NOMINAL DIAMETER AT LEAST 10 INCHES FOR SURFACE WELLHEAD CONFIGURATIONS AND AT LEAST 12 INCHES FOR FLOATING DRILLING OPERATIONS? Authority: 431(a) Enforcement Action: S INSPECTION PROCEDURE: Verify that the spool outlet and diverter line nominal diameter is properly sized. IF NONCOMPLIANCE EXISTS: Issue a rig shut-in (S) INC if the nominal diameter of the spool outlet and diverter line is not properly sized. INSPECTION COUNT/ INC COUNT: Enter one item checked/ issue one INC per diverter system inspected.</p>
<p>D-324</p>	<p>ARE BOTH OUTLETS PIPED TO PROVIDE DOWNWIND DIVERSION CAPABILITY, IF DUAL SPOOL OUTLETS ARE UTILIZED? Authority: 431(b) Enforcement Action: S INSPECTION PROCEDURE: Verify that spool outlets are piped to provide downwind diversion. IF NONCOMPLIANCE EXISTS: Issue a rig shut-in (S) INC if both outlets are not piped to provide downwind diversion. INSPECTION COUNT/ INC COUNT: Enter one item checked/ issue one INC per diverter system inspected.</p>
<p>D-326</p>	<p>ARE DIVERTER SEALING ELEMENTS AND DIVERTER VALVES PRESSURE TESTED TO A MINIMUM OF 200 PSI WHEN NIPILED UP ON CONDUCTOR CASING, WITH NO MORE THAN 7 DAYS ELAPSED TIME BETWEEN SUBSEQUENT TESTS? Authority: 433(a) Enforcement Action: W/S Note: Pressure test not required on subsea diverter systems. INSPECTION PROCEDURE: Verify that diverter sealing elements and diverter valves are pressure tested to a minimum of 200 psi with no more than 7 days between tests. IF NONCOMPLIANCE EXISTS: Issue a warning (W) INC if records indicate the following and the diverter is no longer installed: 1. Diverter sealing elements and diverter valves were not pressure-tested to a minimum of 200 psi when nipped up on conductor casing. 2. More than 7 days have elapsed between any subsequent test. Issue a rig shut-in (S) INC if the diverter is installed and has not been tested or more than 7 days has elapsed between subsequent test. INSPECTION COUNT/ INC COUNT: Enter one item checked/ issue one INC for each inspection</p>
<p>D-327</p>	<p>ARE SUBSEQUENT ACTUATION TESTS OF THE DIVERTER SEALING ELEMENT, DIVERTER VALVES, AND DIVERTER-CONTROL SYSTEMS, INCLUDING THE REMOTE-CONTROL SYSTEM, CONDUCTED AT LEAST ONCE EVERY 24-HOUR PERIOD ALTERNATING BETWEEN CONTROL STATIONS FOR SURFACE DIVERTER SYSTEMS? Authority: 433(a) Enforcement Action: W 433(c) INSPECTION PROCEDURE: Verify that actuation tests are conducted. IF NONCOMPLIANCE EXISTS: Issue a warning (W) INC if records indicate that surface diverter system equipment has not been actuation tested at least once during every 24-hour period. INSPECTION COUNT/ INC COUNT: Enter one item checked/ issue one INC for each inspection</p>
<p>D-334</p>	<p>IS VESSEL HEADING MAINTAINED TO ALLOW FOR DOWNWIND DIVERSION, ON DYNAMICALLY-POSITIONED DRILL SHIPS? Authority: 432(d) Enforcement Action: S INSPECTION PROCEDURE: Verify that downwind diversion can be or is being maintained. IF NONCOMPLIANCE EXISTS: Issue a rig shut-in (S) INC until vessel heading is changed to allow for downwind diversion. INSPECTION COUNT/ INC COUNT: Enter one item checked/ issue one INC for each inspection</p>

DRILLING FLUID PROGRAM

D-400

HAS DRILLING FLUID BEEN PROPERLY CONDITIONED BY CIRCULATION BEFORE STARTING OUT OF THE HOLE WITH DRILL PIPE, OR IS THERE PROPER DOCUMENTATION IN THE DRILLER'S REPORT THAT CIRCULATION WAS NOT NECESSARY?

Authority: 456(a)

Enforcement Action: W

DEFINITIONS:

Properly conditioned – Drilling fluid which has been circulated bottoms up and drilling fluid volume going into the borehole essentially equals the drilling fluid volume coming out of the borehole.

INSPECTION PROCEDURE:

Verify that the drilling fluid has been properly conditioned or that proper documentation shows that circulation was not necessary before starting out of the hole.

Note:

1. Examples of verification are:
 - A. Well not flowing prior to pulling out of the hole.
 - B. Drilling fluid weight in is equal to drilling fluid weight out within 0.2 ppg (1.5 pcf).
2. If drilling fluid weight out is lighter than drilling fluid weight in by more than 0.2 ppg (1.5 pcf), drilling fluid shall be circulated bottoms up, and rechecked for flow and weight properties.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when records indicate that the drilling fluid has not been properly conditioned by circulation before starting out of the hole or there is no documentation that circulation was not necessary.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-401

WHEN COMING OUT OF THE HOLE WITH DRILL PIPE, IS THE ANNULUS FILLED WITH DRILLING FLUID BEFORE THE CHANGE IN DRILLING FLUID LEVEL DECREASES THE HYDROSTATIC PRESSURE BY 75 PSI, OR EVERY FIVE STANDS OF DRILL PIPE, WHICHEVER GIVES A LOWER DECREASE IN HYDROSTATIC PRESSURE?

Authority: 456(c)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the hole is filled after pulling posted number of stands.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when more than the posted number of stands are pulled and hole is not filled.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-402

HAS THE NUMBER OF STANDS OF DRILL PIPE AND DRILL COLLARS THAT MAY BE PULLED PRIOR TO FILLING THE HOLE AND THE EQUIVALENT DRILLING FLUID VOLUME NEEDED TO FILL THE HOLE BEEN CALCULATED AND HAVE BOTH BEEN POSTED NEAR THE DRILLER'S STATION?

Authority: 456(c)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify the fill-up volume.
2. Verify that fill-up volume equivalents, for the drill pipe and drill collars in use, are posted in the drill floor area.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when these volumes are not posted near the driller's station.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-403

FOR EACH CASING STRING, IS THE MAXIMUM PRESSURE TO BE CONTAINED UNDER THE BOP STACK CALCULATED AND POSTED NEAR THE DRILLER'S STATION?

Authority: 456(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the maximum pressure to be contained is posted.

Note: As a minimum, the following two pressures must be posted:

1. The surface pressure at which the shoe would break down.
2. The lesser of the BOP's rated working pressure or 70 percent of casing-burst pressure (or casing test otherwise approved by the District Manager).
3. The format of a sample calculation of the maximum pressure to protect the formation at the casing shoe is shown in Appendix 23.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the required pressure is not properly posted.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-404

IN AREAS WHERE PERMAFROST AND/OR HYDRATE ZONES MAY BE PRESENT OR ARE KNOWN TO BE PRESENT, ARE DRILLING FLUID TEMPERATURES CONTROLLED?

Authority: 456(j)

Enforcement Action: W

INSPECTION PROCEDURE:

1. Verify that drilling fluid temperatures have been controlled by checking daily drilling fluid reports.
2. Inspect APD and drilling plan for consistency.
3. Inspect daily drilling reports.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if drilling fluid temperatures have not been controlled.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-405

IS AN OPERABLE DRILLING FLUID-GAS SEPARATOR AND OPERABLE DEGASSER INSTALLED PRIOR TO COMMENCEMENT OF DRILLING OPERATIONS AND MAINTAINED THROUGHOUT THE DRILLING OF THE WELL?

Authority: 456(g)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify the installation of an operable drilling fluid-gas separator and an operable degasser.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when an operable drilling fluid-gas separator and/or an operable degasser are not installed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-406

IS THE TEST FLUID IN THE HOLE CIRCULATED OR REVERSE-CIRCULATED PRIOR TO PULLING THE DRILL-STEM TEST TOOLS FROM THE HOLE AND WAS IT RECORDED IN THE DRILLER'S REPORT?

Authority: 456(b)

Enforcement Action: W

456(h)

INSPECTION PROCEDURE:

Verify that circulation was established prior to pulling drill stem test tools.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if:

1. Test fluid in hole was not circulated or reverse-circulated prior to pulling test tools.
2. Circulation was not recorded.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-407

IS DRILLING FLUID TESTING EQUIPMENT MAINTAINED ON THE DRILLING RIG AT ALL

TIMES?

Authority: 456(i)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that the drilling fluid testing equipment to perform the following tests is located on-site:

1. Density.
2. Viscosity.
3. Gel strength.
4. Hydrogen-ion concentration (pH).
5. Filtration.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when drilling fluid testing equipment is not located on-site.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-408

ARE DRILLING FLUID TESTS PERFORMED ONCE EACH TOUR, OR MORE FREQUENTLY, IF CONDITIONS WARRANT AND ARE THE RESULTS RECORDED IN THE DRILLER'S REPORT?

Authority: 456(i)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that drilling fluid tests were performed at least once each tour.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when tests are not performed.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-410

IS A DRILLING FLUID-PIT LEVEL INDICATOR WITH AUDIBLE AND VISUAL WARNINGS INSTALLED AND USED?

Authority: 457(a)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify the installation of a drilling fluid-pit level indicator.
2. Witness the operation of the system including audible and visual alarms by actuating the level sensors.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when a drilling fluid-pit level indicator system is not installed and operational.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-411

IS A DRILLING FLUID-VOLUME MEASURING DEVICE USED TO DETERMINE THE DRILLING FLUID VOLUMES REQUIRED TO FILL THE HOLE ON TRIPS?

Authority: 457(b)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify the installation of a drilling fluid-volume measuring device (i.e., trip tank or stroke counter).
2. Witness the operations of the drilling fluid-volume measuring device if trip operations are in progress during the inspection.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when a drilling fluid-volume measuring device (i.e., trip tank or stroke counter) is not installed and operational.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-412

ARE DRILLING FLUID-RETURN INDICATOR DEVICES, WHICH INDICATE THE RELATIONSHIP BETWEEN DRILLING FLUID-RETURN FLOW RATE AND PUMP DISCHARGE RATE, INSTALLED WITH VISUAL AND AUDIBLE WARNING ALARMS?

Authority: 457(c)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify the installation of the drilling fluid-return indicator.
2. Witness the operation of the indicator by actuation of the drilling fluid-return sensing device.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC when a drilling fluid-return indicator is not installed and operational.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

**DRILLING FLUID-HANDLING AREAS
(CLASSIFIED AS WHERE DANGEROUS
CONCENTRATIONS OF COMBUSTIBLE GAS MAY ACCUMULATE)**

D-421

IF NOT CONTINUOUSLY ACTIVATED, ARE MECHANICAL VENTILATION SYSTEMS ACTIVATED ON SIGNAL FROM GAS DETECTORS THAT ARE OPERATIONAL AT ALL TIMES INDICATING THE PRESENCE OF 1 PERCENT OR MORE OF GAS BY VOLUME?

Authority: 459(a)(2)

Enforcement Action: S

DEFINITION:

Classified area - Identified in Appendix 21.

Gas detectors - Must be capable of indicating the presence of 1 percent of gas by volume.

INSPECTION PROCEDURE:

1. Identify enclosed, classified drilling fluid-handling areas.
2. Verify that if a ventilation system is not continuously activated, that it has gas detectors that activate the system if gas is detected.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if non-continuously activated ventilation systems do not have gas detectors that activate the system.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-422

ARE ALL CLASSIFIED DRILLING FLUID-HANDLING AREAS EQUIPPED WITH HIGH-CAPACITY MECHANICAL VENTILATION SYSTEMS UNLESS SUCH VENTILATION IS PROVIDED BY NATURAL MEANS?

Authority: 459(a)

Enforcement Action: S

459(a)(1)

DEFINITION:

Enclosed area - Any area confined on more than four of its six possible sides by walls, floors, or ceilings more restrictive to air flow than grating or fixed open louvers and of sufficient size to allow entry of personnel.

High capacity mechanical ventilation system - A system that is capable of replacing the air once every 5 minutes or 1.0 cubic feet of air-volume flow per minute per square foot of area, whichever is greater.

INSPECTION PROCEDURE:

1. Identify classified drilling fluid-handling areas.
2. Verify the presence of high capacity mechanical ventilation systems.
3. Verify the existence of adequate ventilation by adequate means.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if the drilling fluid-handling area does not have adequate ventilation by natural means or the enclosed area is not equipped with a high-capacity ventilation system.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-423

ARE ALL CLASSIFIED DRILLING FLUID-HANDLING AREAS MAINTAINED AT A NEGATIVE PRESSURE BY MECHANICAL VENTILATION?

Authority: 459(a)(3)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Identify classified drilling fluid-handling areas.
2. Verify that negative pressure relative to adjacent areas is maintained.
3. Confirmation would be that the mechanical ventilation system is activated.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if the drilling fluid-handling area is not maintained at a negative pressure relative to adjacent areas.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-424

ARE ALL CLASSIFIED DRILLING FLUID-HANDLING AREAS WHICH ARE MAINTAINED AT A NEGATIVE PRESSURE PROTECTED WITH AT LEAST ONE OF THE FOLLOWING: (i) A PRESSURE-SENSITIVE ALARM, (ii) OPEN-DOOR ALARMS ON EACH ACCESS TO THE AREA, (iii) AUTOMATIC DOOR-CLOSING DEVICES, (iv) AIR LOCKS, OR (v) OTHER DEVICES APPROVED BY THE DISTRICT MANAGER?

Authority: 459(a)(3)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Identify classified drilling fluid-handling areas.
2. Verify that the area is equipped with one of the following devices:
 - A. A pressure sensitive device.
 - B. Open-door alarms on each access to the area.
 - C. Automatic door-closing devices.
 - D. Air locks.
 - E. Other devices as approved by the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if at least one of these devices are not installed and operable.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-425

ARE ALL CLASSIFIED DRILLING FLUID-HANDLING AREAS FITTED WITH GAS DETECTORS AND ALARMS EXCEPT IN OPEN AREAS WHERE ADEQUATE VENTILATION IS PROVIDED BY NATURAL MEANS?

Authority: 459(b)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that gas detectors and alarms are installed and operable in classified drilling fluid-handling area, except in open areas where adequate ventilation is provided by natural means.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if gas detectors and alarms are not installed and operable.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-426

ARE ALL CLASSIFIED DRILLING FLUID-HANDLING AREAS EQUIPPED WITH EITHER EXPLOSION-PROOF OR PRESSURIZED ELECTRICAL EQUIPMENT TO PREVENT THE IGNITION OF EXPLOSIVE GASES?

Authority: 459(c)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Verify that the electrical equipment is encased and sealed (explosion-proof).
2. Verify specifications on pressurized electrical equipment.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC:

1. If obvious seal damage is detected or any seal hardware is missing.
2. If rig specifications indicate that electrical equipment is not pressurized.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-427

IS THE AIR INTAKE LOCATED OUTSIDE OF, AND AS FAR AS PRACTICABLE FROM, HAZARDOUS AREAS WHERE AIR IS USED FOR PRESSURING EQUIPMENT?

Authority: 459(c)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that the location of the air intake is outside of, and as far as practicable from, hazardous areas.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if air intake is located within or too close to a hazardous area.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-428

ARE MECHANICAL VENTILATION SYSTEMS FITTED WITH ALARMS WHICH ARE

ACTIVATED UPON A FAILURE OF THE SYSTEM?

Authority: 459(d)

Enforcement Action: S

INSPECTION PROCEDURE:

Physically shutdown the ventilation system to verify that the alarm is activated.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if an alarm is not activated when ventilation system fails or is shut down.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-429

ARE GAS DETECTION SYSTEMS TESTED FOR OPERATION AND RECALIBRATED AT A FREQUENCY SUCH THAT NO MORE THAN 90 DAYS SHALL ELAPSE BETWEEN TESTS?

Authority: 459(b)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Witness the testing of the gas detection systems.
2. Verify that gas detection systems have been tested and calibrated at the required intervals.

IF NONCOMPLIANCE EXISTS:

1. Issue a warning (W) INC if:
 - A. The gas detection system has not been tested and calibrated within the required interval but subsequent testing and calibrating has been performed
 - B. Tests have not been recorded in driller's report.
2. Issue a rig shut-in (S) INC if gas detection system has not been tested and calibrated.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

SECURING OF WELLS

D-440

IS A DOWNHOLE SAFETY DEVICE, SUCH AS A CEMENT PLUG, BRIDGE PLUG, OR PACKER, INSTALLED WHEN DRILLING OPERATIONS ARE INTERRUPTED?

Authority: 402

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that a downhole safety device was installed when drilling operations were interrupted.

Note:

1. A downhole safety device such as a cement plug, bridge plug, or packer must be timely installed when drilling operations are interrupted by events such as those which force evacuation of the drilling crew, prevent station keeping, or require repairs to major drilling or well-control equipment.
2. In floating drilling operations, the use of blind-shear rams or pipe rams and an inside BOP may be approved by the District Manager in lieu of the above requirements if supported by special circumstances and/or the lack of sufficient time.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if records indicate that a downhole safety device was not installed when drilling operations were interrupted.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

SUPERVISION, SURVEILLANCE, AND TRAINING

D-450

FROM THE BEGINNING OF DRILLING OPERATIONS UNTIL THE WELL IS COMPLETED OR ABANDONED, IS THE WELL CONTINUOUSLY UNDER SURVEILLANCE UNLESS THE WELL IS SECURED WITH BOP'S, BRIDGE PLUGS, PACKERS, OR CEMENT PLUGS?

Authority: 401(c)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the rig floor is not left unmanned during an inspection unless the wells are secured with a BOP, bridge plug, packers, or cement plugs.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when rig floor is not manned and the wells are not secured as required.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-453

DOES THE OPERATOR HAVE A PERSON ONSITE DURING DRILLING OPERATIONS THAT REPRESENT THEIR INTEREST AND CAN FULFILL THEIR RESPONSIBILITY?

Authority: 401(b)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that the operator has a representative on site.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if no operator representative is on site.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC for each inspection

D-460 DOES THE LESSEE HAVE WRITTEN APPROVAL TO DRILL A WELL OR BEFORE HE SIDETRACKS, BYPASSES, OR DEEPENS A WELL?

Authority: 410

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that approval was received.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if drilling approval has not been received.

INSPECTION COUNT/ INC COUNT:

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

D-461 DOES THE LESSEE HAVE WRITTEN OR ORAL APPROVAL TO REVISE A DRILLING PLAN, MAKE CHANGES IN MAJOR DRILLING EQUIPMENT OR PLUG BACK A WELL?

Authority: 465(a)(1)

Enforcement Action: S

INSPECTION PROCEDURE:

Verify that any changes from the approved plans have been received and approved by the District Manager.

IF NONCOMPLIANCE EXISTS:

Issue a rig shut-in (S) INC if the records indicate that approval has not been received for any changes from the approved plans.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per well inspected

D-462 IF A MODU IS PLANNED TO BE USED, IS THE MODU AVAILABLE FOR INSPECTION BY THE DISTRICT MANAGER BEFORE COMMENCING OPERATIONS?

Authority: 417(f)

Enforcement Action: W

INSPECTION PROCEDURE:

Verify that the District Manager was notified and that the MODU was available for inspection.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the MODU was not made available for inspection.

INSPECTION COUNT/ INC COUNT:

Enter one item checked/ issue one INC per drilling unit inspected

D-463 IS THE DISTRICT MANAGER GIVEN AT LEAST 24 HOURS NOTICE BEFORE STARTING A WELL TEST?

Authority: 460(b)

Enforcement Action: W

Note: For a well test to be conducted, it must be included in the APD (form MMS-123) or in the APM (form MMS-124).

INSPECTION PROCEDURE:

Verify that the District Manager was notified as required.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the District Manager was not notified as required.

INSPECTION COUNT/ INC COUNT:

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