Safety Alert



U.S. Department of the Interior Minerals Management Service <u>Gulf of Mexico OCS</u> Region

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Plug and Abandonment Operations Lead to Fatality and Brief Loss of Well Control

Recently, an accident that resulted in one fatality and a brief loss of well control occurred during a rig-less plug and abandonment operation. The tubing was being stripped out of the hole by using a hydraulic rig (casing jacks) when the tubing became stuck. An attempt was made by the operator representative to pull the tubing when the tubing parted. The parted tubing was forced upward, causing the top slips to be ejected from the top bowl of the casing jacks. The ejected slips fatally struck the operator representative as he attempted to evacuate the immediate area. The well was then secured by closing the BOP's from the accumulator control unit.

It was concluded, in part, in an MMS investigation of the incident that:

- (1) the operator representative exceeded the yield strength of the tubing when he pulled approximately 135,000 pounds on the tubing, causing it to part;
- (2) the operator representative did not calculate enough of a safety factor when he determined maximum amount of pull for the grade of pipe;
- (3) the lack of appropriate equipment (snubbing unit) and appropriately trained personnel contributed to this incident;
- (4) poor judgment and decision-making by the operator representative and the contractor's field supervisors on the platform contributed to this incident; and
- (5) ineffective management and supervision of the operation by the designated operator and contractor (offsite) contributed to this incident.

The designated operator relied entirely on consultants to supervise the operation onsite and offsite and failed to provide direct oversight and control of the operation.

MMS, therefore, recommends to operators that:

- When conducting this type of operation, operators should maintain adequate oversight of the contractors to ensure that all industry-accepted practices are being followed and no unnecessary shortcuts are being taken.
- Operators should conduct a pre-job meeting with **all** involved parties. The purpose of the meeting should be to outline the scope of work to be conducted and the manpower requirements, identify lines of authority and responsibility, identify potential hazards and

- mitigations, outline the process for managing changes in the job, and stress the importance of "Stop Work" authority and reporting unsafe acts and conditions.
- When using consultants as the operator representative, operators should require a site inspection by an operator representative employed by the operator prior to the commencement of work to verify that the equipment is rigged up according to approved plans and methods.
- Operators should require the contractors to provide detailed activity logs of the work being performed.

For details of the accident, see <u>OCS Report MMS 2007-037</u>. Copies of the report may be obtained from the MMS Public Information Office located at 1201 Elmwood Park Boulevard, New Orleans, Louisiana 70123 (1-800-200-GULF or local 504-736-2519). The full report is also available on the MMS Gulf of Mexico OCS Region website.

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