

CARES Act Flash Report

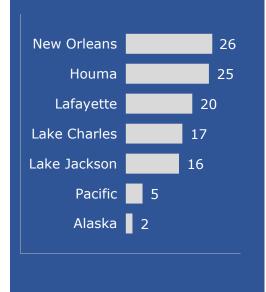
The Bureau of Safety and Environmental Enforcement's Safety Inspection Program COVID-19 Response

We reviewed the guidance BSEE developed to mitigate inspectors' exposure to COVID 19, and we reached out to its regions, districts, and individual inspectors to see how they implemented the guidance.

We found that BSEE:

- Developed, communicated, and updated COVID 19 guidance for all personnel involved with offshore inspections
- Continued to complete its required inspections
- Adapted its practices and remotely witnessed operators blowout preventer tests by accessing the operators software systems

Number of BSEE Inspectors by Office



The Bureau of Safety and Environmental Enforcement's (BSEE's) mission is to promote safety, protect the environment, and conserve resources offshore through vigorous regulatory oversight and enforcement. BSEE's Safety Inspection Program assists in implementing BSEE's mission by performing safety and environmental inspections of offshore oil and gas production operations. BSEE's Inspectors typically travel via helicopter to inspect operations and equipment on offshore oil and gas production platforms, drilling rigs, and other facilities. Annually, BSEE conducts more than 20,000 inspections at over 2,300 facilities.

Given the importance of inspections to public safety and environmental protection, we reviewed the actions BSEE's three regions—the Gulf of Mexico Region (GOMR), Pacific Region, and Alaska Region—have taken to protect its inspectors and offshore employees from COVID-19 and evaluated any impacts the virus had on inspections BSEE conducted since March 2020.

Results of Our Review

During the COVID-19 pandemic, BSEE continued to fulfill its mission by performing safety and environmental inspections for offshore oil and gas operations.

We found that BSEE implemented mitigating measures to protect its inspectors from the transmission of COVID-19 and that the virus did not impact BSEE's ability to follow its annual inspection plan. We also noted that BSEE adapted its blowout preventer (BOP) test process to allow remote inspections to reduce the risk of exposure to COVID-19.

BSEE's COVID-19 Mitigating Measures

BSEE developed and implemented COVID-19 guidance to protect its inspectors from exposure to the virus and updated the guidance as more information became available. On March 20, 2020, BSEE issued initial guidance to all inspectors and continued to revise its guidance as necessary. Many of the district managers and supervisors told us they held regular meetings to keep the inspectors informed of any changes.

Offshore Operators Committee COVID 19 Personnel Screening Levels for Travel to Offshore Facilities Include:

- **Level 1:** Questionnaire related to Centers for Disease Control and Prevention guidance
- Level 2: Individual body temperature screening with medical screening by a medical professional if warranted
- Level 2+: Level 2 screening plus self monitored onshore quarantine protocols
- **Level 3:** Required COVID 19 test screening to detect the virus and test for antibodies
- Level 3+: Level 3 screening plus self monitored onshore quarantine protocols

BSEE Communications

Direct communication proved beneficial when an operator notified BSEE that one of its employees had a confirmed case of COVID 19. Within an hour, BSEE had identified and notified the two inspectors who were potentially exposed. Both BSEE inspectors were sent for COVID 19 tests and quarantined until the test results were returned; the two BSEE inspectors did not contract the virus. In another instance, an inspector told us that the operator had notified BSEE that there was a confirmed COVID 19 case while the inspectors were traveling to the offshore facility; BSEE contacted the pilot and directed them to return to shore.

BSEE has implemented the following mitigating measures:

- Inspectors and aircraft pilots complete a screening process.
- Certain operators request inspectors to be quarantined 7 to 14 days prior to conducting an inspection.
- BSEE provided personal protective equipment (e.g., masks, gloves, face shields) to inspectors.
- BSEE inspectors follow the procedures for the COVID-19 screening levels each operator has implemented at its facility (see sidebar for the Offshore Operators Committee COVID-19 screening levels).

In addition, BSEE informed us that officials work closely with operators to stay informed about any virus outbreaks that have occurred offshore. Specifically, BSEE's GOMR implemented a documented process where BSEE officials contact each operator the day before and the day of every inspection to ensure that there were no reported COVID-19 cases. BSEE officials in the Pacific and the Alaska regions, likewise, told us that they regularly communicate with the operators about COVID-19 cases.

COVID-19 Impacts on Inspections

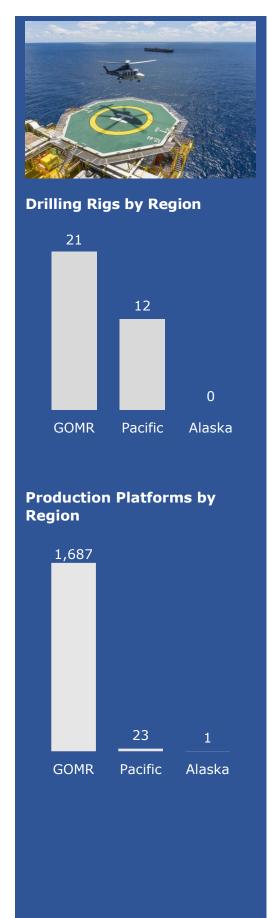
According to BSEE officials, the virus did not impact BSEE's ability to fulfill its mission. BSEE personnel told us that while inspections initially slowed down at the beginning of March because of COVID-19, no inspections were delayed beyond the annual statutory requirement, and the regions expect to complete their inspections as planned. BSEE conducted 3,581 inspections from March 1, 2020, through June 10, 2020 (see Figure 1).

Figure 1: BSEE Inspections Conducted from March 1, 2020, through June 10, 2020

Region	No. of Inspections
Gulf of Mexico	3,519
Pacific & Alaska*	62
Total	3,581

^{*} Pacific and Alaska regions combined.

¹ 43 U.S.C. § 1348(c).



BSEE Adapted Its Blowout Preventor Inspection Process

BSEE inspectors informed us that they modified one of their annual inspection practices to perform it remotely rather than placing the inspectors and operators at risk of contracting and spreading COVID-19. Specifically, BSEE is required to annually witness operators' BOP tests. The BOP is designed to prevent and mitigate loss of well control events during offshore drilling operations. As an important safety system, operators perform regular testing of the BOP to ensure it is functioning properly and that it meets the design requirements.

Prior to the COVID-19 pandemic, BSEE inspectors would go offshore for multiple days to witness the operators' BOP test and ensure that it met safety requirements. Because going offshore for multiple days could increase potential exposure to COVID-19, inspectors told us that they remotely witnessed operators' BOP tests as a mitigating measure. The inspectors performing the virtual inspections have been remotely monitoring the BOP test by accessing the operators' software testing systems and viewing the data in real time.

We found that inspectors performed 17 remote BOP inspections since March 1, 2020. BSEE inspectors informed us that the typical in-person process involves observing the operators' software testing systems and equipment during the test. We learned that most operators do not have the ability to remotely display the equipment in real time, and BSEE did not provide the inspectors with guidance on how to witness the BOP remotely. Because observing the equipment during the test has proven to be challenging, we recommend that BSEE determine what is practical and develop guidance for inspectors witnessing BOP tests remotely. As of July 15, 2020, BSEE officials told us that they were developing this guidance.

Key Action: Considering the COVID-19 exposure risks for personnel conducting offshore inspections and the potential impact on safety, it is imperative that BSEE continue to update its COVID-19 guidance, work with operators to limit the risks to its inspectors, and finalize its guidance on conducting remote witnessing of operators' BOP tests.