



# Office of Safety Data and Analysis SafeOCS Program

## SPPE Form Update

**Demetra Collia, SafeOCS Program Director**

**Allison Fischman, SafeOCS Analyst**

**Mar. 31 & Apr. 7, 2021**



# Housekeeping

- Please mute phone unless speaking
- Feel free to share questions verbally or in the chat anytime during the training

# Agenda

- *Background:* SafeOCS SPPE Program Overview
- *Who, What, When, Where:* SPPE Failure Reporting Requirements
- *How:* How to Submit Failure Reports
- *Why:* Reasons for Form Update
- Overview of Changes
- Demo Form and Review Selected Changes
- Next Steps
- Q & A

# *Background:* SafeOCS



Well control equipment failure reporting program



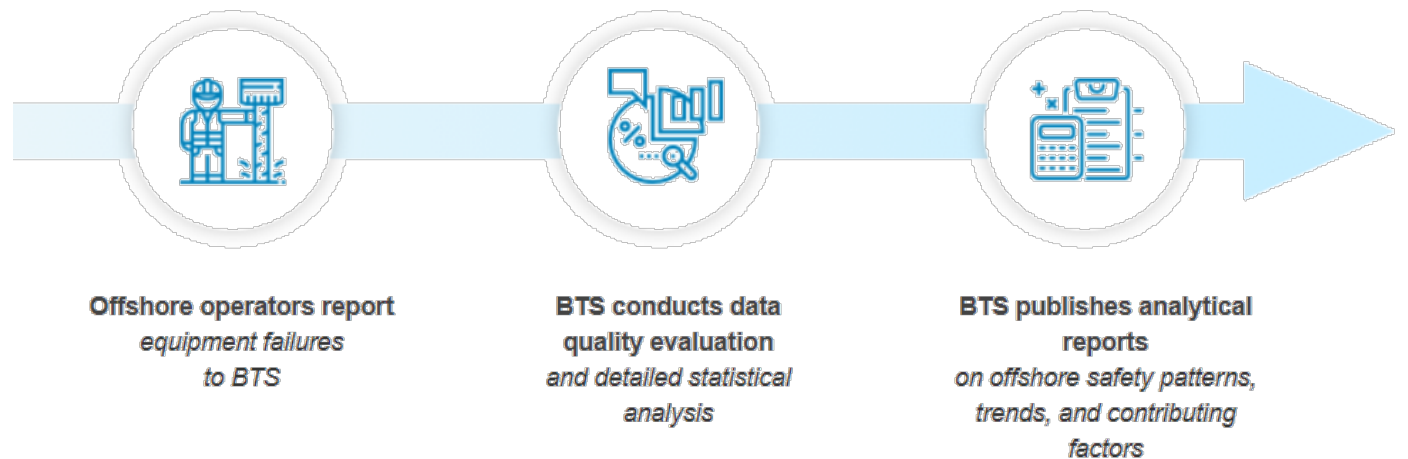
SPPE failure reporting program



Industry safety data reporting program

*Background:*  
SafeOCS  
SPPE Failure  
Reporting  
Program

- Reporting required under BSEE regulation 30 CFR 250.803
- Operators must submit these reports directly to the Bureau of Transportation Statistics (BTS) via [www.safeOCS.gov](http://www.safeOCS.gov)
- BSEE and BTS [MOU](#)



# *Background:* CIPSEA

- BTS operates SafeOCS under the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA)
- All **confidential data** is protected from release under CIPSEA:
  - Company information
  - PII
  - Sensitive or proprietary information
- Confidential data...
  - cannot be released to the public, BSEE, or other non-CIPSEA federal agencies
  - protected from subpoenas and FOIA requests
  - may be used only for statistical purposes
- Additional information about BTS and CIPSEA protections can be found [here](#)

## *Background:*

# CIPSEA (cont'd)

- Submitted failure event information goes through a detailed quality evaluation and statistical analysis
- Statistical analysts and petroleum engineer subject matter experts conduct these reviews
- Data is then aggregated and evaluated for industry-wide patterns and trends
- This aggregated information is non-confidential, and shared with stakeholders in public reports and data dashboards

*Background:*  
Sharing  
Results

- All reports of aggregated information are posted to SafeOCS website: [www.safeocs.gov](http://www.safeocs.gov)
  - Includes 2019 SPPE Annual Report
- SafeOCS [SPPE Dashboard](#) is updated monthly with summary statistics on reported failure events



*Background:*  
Safety and  
Pollution  
Prevention  
Equipment

- The specific SPPE covered by the Production Safety Systems Rule protects personnel and the environment by controlling the flow of well fluids, especially in case of an emergency or failure
- Under the rule, SPPE includes all:
  - SSVs
  - BSDVs
  - USVs
  - SCSSVs
  - SSCSVs
  - GLSDVs

*Who, What,  
When, Where:*

# SPPE Failure Reporting Requirements

- **Who must report?**
  - All oil and gas operators on the OCS
- **What must be reported?**
  - All *failures* must be reported: *any condition that prevents the equipment from meeting the functional specification or purpose*
- **When should a report be submitted?**
  - Within 30 days after discovery and identification of failure
  - Investigation and analysis must be performed within 120 days, and any investigation information must also be submitted to BTS
- **Where do I go to report?**
  - [www.safeOCS.gov](http://www.safeOCS.gov)



*How:*

# How to Submit Failure Reports

- New form required for all 2021 notifications
- Form is available in 2 formats:
  - Online form (preferred)
  - Word form
- To ensure CIPSEA protections, all forms must be submitted through SafeOCS secure portal
  - Do **not** submit via email
  - Do **not** submit to BSEE
- Refer to [SPPE User Guide](#) for detailed submission instructions and guidance

# What event information is shared with BSEE?

- For events reported per 30 CFR 250.803, BSEE is sent an email notification with the company name, submittal and event dates, and reference number.
- No details about the event are shared.

**From:** SafeOCS  
**Sent:** Thursday, March 31, 2021 11:00 AM  
**To:** from\_soc@bsee.gov  
**Subject:** Notification to BSEE: SPPE

Notification of an SPPE equipment failure:

- Submittal Date: Mar 25, 2021
- Company Name: CompanyABC Corp.
- Company ID:
- Reference Number: SPPE2021#000000
- Event Date: Mar 31, 2021

Respectfully,  
The SafeOCS Team  
SafeOCS@dot.gov  
1-844-OCS-FRST (1-844-627-3778)

*Why:*

# Reasons for Form Update

In preparation for the 2021 data collection:

1. Improve data quality
2. Improve data collection consistency
3. Improve analysis and identification of learnings

# Overview of Changes

- Reorganize/regroup fields to create logical sections and better overall structure
- Clarify text for ambiguous fields
- Provide additional and clarify some drop-down choices
- Add key fields such as *failure type* and *contact information*

# Overview of Changes

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L  
D

- I. **Operator Data**
- II. **SPPE Details**
- III. **What was the Certification Status of the Failed SPPE (select one)**
- IV. **Was the SPPE previously repaired, remanufactured or subject to hot work offsite?**
- V. **What type of tree was associated with the SPPE that failed? (select one)**
- VI. **Which SPPE component failed? (select all that apply)**
- VII. **SPPE Type**
- VIII. **SSSV Details**
- IX. **BDSVs, SSVs, and USVs**
- X. **SPPE Design Criteria**
- XI. **Well data (Provide the information below, as applicable)**
- XII. **Under what conditions was the SPPE activated at the time of the failure (check all that apply)**
- XIII. **Description of the failure**
- XIV. **Specify how many cycles or hours were completed since the last preventative maintenance.**
- XV. **Provide a narrative describing the general configuration of the SPPE and hydrocarbon flow path.**
- XVI. **What factors contributed to the failure? (select all that apply)**
- XVII. **Preliminary Root Cause (select all that apply)**
- XVIII. **Is a formal Root Cause and Failure Analysis recommended**
- XIX. **Corrective Action**
- XX. **Was the failure associated with an HSE Incident**

- I. **Operator/Location Data**
- II. **Description of the Failure**
- III. **SPPE Details and History**
- IV. **Well Data**
- V. **Additional Failure Details**

N  
E  
W

# Demo Form and Review Selected Changes

U.S. Department of Transportation  
Bureau of Transportation Statistics

About WCR **SPPE** ISD Data Insights Resources Create an Account

SafeOCS

SafeOCS SPPE Reporting Login

Email

E-mail

Password

Log in

Create an Account Forgot password?

[https://www.safeocs.gov/sppe\\_home.htm](https://www.safeocs.gov/sppe_home.htm)



Section	Change Type (add/delete/change)	Reasons for Changes
I. Operator /Location Data	<ol style="list-style-type: none"> <li>1. Change section title</li> <li>2. Change <b>API well number</b> field</li> <li>3. Add <b>Lease number</b> field</li> <li>4. Add Well Name field and clarify dual completions</li> <li>5. Add <b>Name of person completing form</b> field</li> </ol>	<ul style="list-style-type: none"> <li>- To reflect added fields to the section</li> <li>- API number: specify format and number of digits</li> <li>- Reporters often put lease and well numbers in the API Well Number field</li> <li>- Dual completion wells have the same API number.</li> <li>- Field was an omission in current form</li> </ul>

## Form Change Details

Section	Change Type (add/delete/change)	Reasons for Changes
II. Description of Failure	<ol style="list-style-type: none"><li data-bbox="522 449 930 578">1. Change to move section up on form</li><li data-bbox="522 792 980 849">2. Change to clarify text</li><li data-bbox="522 1049 1019 1192">3. Change to move Date of Failure from Section I.</li></ol>	<ul style="list-style-type: none"><li data-bbox="1133 449 1668 735">- Reporters were looking for description of failure earlier in the form and misusing other text fields</li><li data-bbox="1133 792 1617 921">- Encourage specificity and more detail</li><li data-bbox="1133 1106 1668 1235">- Keep related fields in the same section.</li></ul>

## Form Change Details

Section	Change Type (add/delete/change)	Reasons for Changes
III. SPPE Details and History	<ol style="list-style-type: none"> <li>1. Change to regroup fields and add clarity</li> <li>2. Change to combine questions</li> <li>3. Add question on <b>SSSV installation and testing frequency</b></li> <li>4. Add <b>Date SPPE was installed</b> field</li> </ol>	<ul style="list-style-type: none"> <li>- Improve flow, structure, and clarity</li> <li>- For brevity and to request SSSV type</li> <li>- Insights into valve installation and testing frequency</li> <li>- Not included in current form</li> <li>- Not included in current form</li> </ul>

## Form Change Details

Section	Change Type (add/delete/change)	Reasons for Changes
III. SPPE Details and History	5. Add <b>Date affected component last repaired/maintained</b> field  6. Change SCSSV retrievable and SSCSV retrievable options to clarify  7. Change BDSV to BSDV	<ul style="list-style-type: none"> <li>- The SSCSV fields caused confusion and were duplicative</li> <li>- BSEE feedback incorporated</li> <li>- Correct misspelling</li> </ul>

## Form Change Details

Section	Change Type (add/delete/change)	Reasons for Changes
IV. Well Data	<ol style="list-style-type: none"> <li>1. Change to regroup fields</li> <li>2. Change to clarify text for well configuration</li> <li>3. Add drop-down options in <b>Environmental conditions</b> field</li> <li>4. Add <b>Well Status at the time of Failure</b> field</li> </ol>	<ul style="list-style-type: none"> <li>- Improve flow and structure</li> <li>- Added typical subsea well configurations</li> <li>- Increase specificity and accommodate frequently submitted "other" entries</li> <li>- Replace the often misunderstood question about "well shut-in at the time of failure" question. Improve knowledge of well status at time of failure.</li> </ul>

## Form Change Details

Section	Change Type (add/delete/change)	Reasons for Changes
V. Additional Failure Details	<ol style="list-style-type: none"> <li>1. Change to regroup fields</li> <li>2. Add <b>Failure Type</b> field</li> <li>3. For external leaks, added drop-down list of substance types (formerly free text). Add question on volume leaked.</li> </ol>	<ul style="list-style-type: none"> <li>- Improve flow and structure</li> <li>- Relocate misplaced options under "contributing factors" that were "failure types", which was an omission</li> <li>- Improve data quality for external leaks</li> </ul>

## Form Change Details

Section	Change Type (add/delete/change)	Reasons for Changes
V. Additional Failure Details	<p>4. Add option under conditions when the SPPE was activated</p> <p>5. Add subheadings for contributing factors</p> <p>6. Add and combine drop-down options for <b>Corrective Actions</b> field; add short definitions.</p> <p>7. Revise drop-down options for <b>Preliminary Root Causes</b> field</p>	<ul style="list-style-type: none"> <li>- Add option 'Discovered during intervention/well work' for specificity</li> <li>- Improve form legibility</li> <li>- Improve consistency and accommodate often submitted "other" entries</li> <li>- Require a single root cause. Increase alignment with the WCR root cause field.</li> </ul>

## Form Change Details

# Next Steps

- Focus of 2021 data analysis
- Continuous improvement objective
- Contact us to set up a time to enter an SPPE failure notification together
- Your experience using the form?



Questions  
& Comments?

Contacts

SafeOCS Website: [www.SafeOCS.gov](http://www.SafeOCS.gov)

SafeOCS Email: [SafeOCS@dot.gov](mailto:SafeOCS@dot.gov)

SafeOCS Phone: 1-844-OCS-FRST  
(1-844-627-3778)

Thank you

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