

SafeOCS WCE Stakeholder Virtual Meeting

Transcript

April 28, 2025 - 26m 52s

Fischman, Allison (OST) 0:03

SLIDE 1: Welcome, everyone. For those of you that I may not have met before, my name's Allison Fishman. I'm the Director of the Office of Safety Data and Analysis at the Bureau of Transportation Statistics. Also, on the line today are several of our SafeOCS team members, data analysts, and subject matter experts. And Michael Pittman is also with us from the Bureau of Safety and Environmental Enforcement. Next slide please.

SLIDE 2: Here is our agenda for today. We're going to provide a brief overview of the SafeOCS program before getting into the primary purpose of today's meeting, which is to review recent updates to the Well Control Equipment data collection form and review resources for the program that you may find useful.

In the interest of time, we'll ask that you hold your questions until the end. You can also put questions in the chat and we'll go through them at the end. And we will of course share these slides after the meeting.

Next slide please.

SLIDE 3: So, what is the SafeOCS program? I think most of you are familiar, but for those that may not be SafeOCS is an industry government collaborative program to increase data sharing and the overall body of knowledge on operational safety in the offshore oil and gas industry. The Bureau of Safety and Environmental Enforcement is the program's sponsor and also requires reporting of some types of data, including the Well Control Equipment data that we'll talk about today.

The Bureau of Transportation Statistics administers the SafeOCS program as the independent third-party data steward. SafeOCS makes data available to the industry in the form of public reports and data dashboards, which are available on SafeOCS.gov. Those dashboards are updated monthly and we encourage you all to take a look.

Next slide please.

SLIDE 4: So the SafeOCS program umbrella actually covers three data collection programs. Two of these cover critical safety equipment, including the Well Control Equipment we will discuss today, as well as the Safety and Pollution Prevention Equipment Failure reporting program.

This equipment is critical safety equipment, meaning physical barriers are provided and the malfunction could result in a safety event. We also in SafeOCS administer a voluntary safety data collection program called the Industry Safety Data program. And this voluntary program focuses on near-miss data and safety data from participating companies.

Next slide please.

SLIDE 5: So what kinds of data protections does the SafeOCS program offer?

And why is the Bureau of Transportation Statistics involved in SafeOCS?

A primary reason that BTS is involved in SafeOCS is the authority to protect the confidentiality of data submitted as a principal federal statistical agency. BTS is authorized to protect data under a law called CIPSEA or the Confidential Information Protection and Statistical Efficiency Act.

I won't read the slide, but there is a few I wanted to highlight a few things that CIPSEA requires. First, the data can be used for statistical purposes only, so no enforcement related purposes. Second, data cannot be shared and identifiable form, meaning BTS is prohibited from disclosing your identifiable data without your consent. And third, strict penalties apply to BTS to us if we violate CIPSEA, including a class E felony and fines up to a quarter million dollars, so we take the confidentiality of your data very seriously.

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SLIDE 6: Moving on to the primary purpose of today's meeting, the Well Control Equipment program. BTS serves as BSEE's third-party designee under 30 CFR 250.730 C, which is the regulatory requirement to submit this type of data. We analyze collected data and share the results of these analysis and aggregated reports and data dashboards on SafeOCS.gov. The data collection form and secure submission portal is also located on our website. You see a screenshot of that to the right side of the slide.

Next slide please.

SLIDE 7: So, we're here today to talk about some of the recent updates to the form. BTS engaged in a review process with BSEE and also with IADC's Rapid S53 BOP Reliability project team to make targeted updates to the Well Control Equipment failure notification format that SafeOCS administers. SafeOCS did this as part of our standard process for administering any statistical program and also to implement improvements identified during the operation of the program, such as clarifying potentially ambiguous fields, applying any kind of lessons we learned as we've been

administering the program, and analyzing the data submitted.
Next slide please.

SLIDE 8: Here is a summary of changes to the form at a high level. Some of the major areas that we focused on were clarifying field titles, dropdown choices, and terminology to reduce the potential for confusion or ambiguity. We added drop down choices and updated drop downs in certain cases to reflect new or changed equipment types since the start of the program. And we streamlined the form organization to make it more intuitive and less burdensome on reporting entities. We added a few new fields to make it easier to share investigation information when an event receives further investigation.
Slide please.

SLIDE 9: SafeOCS offers two versions of the equipment failure notification form, an Excel version and an online version. This is a screenshot of the Excel version. Please note that they are identical forms, and you can use either form. You don't need to submit both. The Excel version may be more useful because it's an offline version of the form and it is available for download at our website.
Next slide please.

SLIDE 10: This is what the online version looks like. Again, it's identical. It has the same fields as the Excel version. We encourage the use of the online form when possible.
So next slide please.

SLIDE 11: We're going to go through each section of the form at a high level, just to point out significant changes that may be useful to be aware of as you fill out the form. So the first few sections of the form cover general information, such as operator and rig information, and several fields will auto populate. For example, if you enter the API well number, the region, country, and water depth will auto populate and if you enter rig name then the drilling contractor will auto populate. So that should save some time if you choose to use the online version of the form, which we encourage.
Next slide please.

SLIDE 12: Section 4 covers detailed information about the event, and there are a few changes that we wanted to point out here.

First, we used to ask for the status of both blowout preventers, one and two, and now we are only asking for the status of the blowout preventer that the failed

component was on or associated with. Whether it is in operation or not in operation—that's what we're looking for there.

Secondly, for work phase, the options that will appear actually will vary depending on your selections for well control system type which would be subsea or surface, the status of the system, whether it's in operation or not in operation, and where in the cycle the blowout preventer was. The options for that are operations testing, 7, 14, or 21-day testing, and operational testing. And for CIPSEA Well Control Equipment systems, the selections tend to follow the cycle of maintenance, inspection, and testing as depicted in this diagram. So that may be a useful reference as you're filling out that data field.

Finally, we wanted to point out some changes to detection methods in this section. Here, what we are interested in is how the failure was initially detected and to help make your selection, we've developed a decision tree.

SLIDE 13: And this decision tree is also in our guidance document, which is available on our website. We have several areas of this guidance document that focus on detection method. Each of the different methods has a definition that may be useful. You can see them here.

Failed on demand. Failed pressure test etc. And we've updated and clarified the definitions of these detection methods here, and again the decision tree is intended to help you identify how the failure was initially detected, which is what we're interested in on the data collection for.

SLIDE 14: Section 5 asks for details about the specific equipment and any relevant repair or inspection history about that equipment. The changes to this section focus primarily on updates to the subunit item component dependency structure to make updates to equipment list based on technology changes, which we'll cover a bit more in the next slide.

Another item to point out is we now ask for the date the component was installed, inspected, or repaired, rather than simply the installation date and we use this to understand the history associated with the component at the time of the failure and the components age.

Next slide please.

SLIDE 15: So, focusing a little bit more specifically on the subunit item component dependency structure, this is an area that we actually tried to streamline quite a bit. Our primary focus in conducting this streamlining exercise was to ensure the equipment lists in our database match the equipment and use in the field.

Considering any new changes to Well Control Equipment over the past several years since the program, the data collection program has been in place.

We also removed equipment whose primary purpose is something other than controlling the well. This used to be listed as auxiliary equipment, and we did a lot of work to ensure that the groups are mutually exclusive and equipment names are clear. An example of a specific changes for control valves. For clarity, these are now categorized as electrically piloted or hydraulically piloted.

SLIDE 17: Section 6 and 7. Section 6 focuses on fluids information, and it is unchanged, so no significant updates there. Section 7 focuses on the outcome of the event that could be helpful for SafeOCS trend analysis and the fields we want to discuss here include repeat failure, accelerated failure, and component status. Note that some fields may not appear or will be grayed out if they're not applicable, such as a CISPSEA BOP stack pool for surface blowout preventer events. That option would be grayed out.

So, focusing on repeat failure, what we're interested in here is whether there was a failure of the same or like component on the same rig within the past year. You would select yes for accelerated failure or we sometimes call this early life failure. Note that the form will calculate the age of the component for you based on the date of the failure and the date that you wrote for installed, inspected, or repaired. And if it's more than five years old, this question will be grayed out. If it's less than five years old, then you would select yes if the component matches the definitions in the guidance document, and this was an area that we work to flush out specific definitions for. So, if the component was less than three months old and not used as a sacrificial component, you would select yes. If it was under a year old and it was electronic cable instrumentation, elastomeric seal, or hose, then you would select yes. If it's under two years old and metallic and expected to last through the five-year maintenance cycle, then you would select yes. Or if it was under five years old and metallic and expected to last for the life of the asset, then you would select yes. And again, these definitions are in the guidance document.

Finally, component status. In this section, it refers to the disposition of the component. For example, if the component was sent to the original equipment manufacturer for repair, then you would select OEM repair for this one. Next slide please.

SLIDE 16: Section 8. This is the final section of the form, and this is also the part that we added a few data fields to and the reason for adding additional data fields for

investigation failure analysis was intended to make it easier to share investigation information with us investigation information that you have. Some of this information includes a summary of analysis findings, any lessons learned that were uncovered, result of the investigation, and we also ask if any relevant OEM alert or bulletin exists on the issue that you know of if you can list it out there.

Next slide please.

SLIDE 18: A little bit more on the investigation and failure analysis section. An important part of this section asks you to list any preventive actions taken as a result of the failure. And here we are looking for finite changes and actions taken to prevent the failure from reoccurring as opposed to actions that are not finite. For example, a preventive action would be a change to a procedure, for example, but probably not something like continue to monitor because that doesn't have a definite conclusion. For each preventive action, we ask for the party responsible for taking the action. We're not looking for an individual's name. We're looking for something like OEM versus rig owner, for example, who owns that preventive action. And the guidance document has additional detailed information here on each of these investigation and failure analysis fields that you may find useful if any question comes up.

SLIDE 19: If a root cause failure analysis report exists, we ask that you upload it as an attachment after you submit your event report. You can also use this same function to add updates to reports that may come in after you submit the initial failure report.

Please also share any relevant investigation materials such as photographs or other documents. To do this you select your report number, and again only reports that your company has submitted will show in the dropdown list. To protect confidentiality, you would select the relevant report and then you would be able to update and add files through the user interface that appears.

SLIDE 20: A few tips finally to help us ensure data quality. We ask that you please complete all the data fields in the form. You can use tool tips to clarify the purpose of fields. To do that, you simply hover your mouse over the blue information button which will provide some additional guidance.

A few things that we covered that we just wanted to point out or highlight. The BOP system status, whether it's in operation or not in operation, that should be the status of the BOP system associated with the failed component itself.

Next slide please.

SLIDE 21: The date that the component was installed, inspected or repaired. Again, we're looking for not just the date that it was installed, but what was the most recent of when it was installed, inspected, or repaired. And there's an additional field to note which of those dates it was. So, was it the newly installed date, repair date, or inspection date? When you're entering this date, take care not to enter the event failure date, because that will result in a component age of 0 inadvertently.

In the investigation and failure analysis section, remember that the preventive action applied to a failure should be described so that has a definite conclusion. And then we also again ask that you attach any relevant documentation such as root cause failure analysis, report photographs, product descriptions, additional investigation documentation, and any product or OEM alerts to help us improve the data quality and long-term improvement opportunities.

SLIDE 22: We do have some additional resources on our website that you may find useful in addition to the guidance document, which my colleague Ben has been sharing during this talk; we have two supplemental reference publications for the Well Control Equipment program.

The first one here called WCE subunit boundaries, summarizes and provides diagrams for the different subunits of the Well Control Equipment. And the second one estimated WCE system component counts provides a comprehensive listing of Well Control Equipment component types. Also, you can reach us by e-mail or voicemail. And we encourage you to reach out to us with any questions or concerns. Next slide please.

SLIDE 23: BSEE also requires a Well Control Equipment failure report, and I'd like to hand it over to Michael Pittman to summarize the requirements for that.

Pittman, Michael 21:22

Sure. We try to make it relatively easy. So this is a subset of the event information that's provided to the BTS. Some people have questions about where we are in terms of the review of our regulations and their impact on industry. This is one of the Biden Administration rules that's under review within the light of also the court case that previously had been filed. And so, we shall see where that one lands. But for now, there's still a requirement to report to both locations in the rule and so, what we have done is through your Tim's Web staging area. Those of you who already use Tim's Web for other reporting through your Regulatory Affairs Office or otherwise, you can submit in that way and if you don't have access, then you can get your

company's designee for that type of submission to designate you if you're going to be submitting these and or designate the person you want submitting these, and then once that designation's there, then we can help them go through the process of signing up and then and then they can submit. Either can submit a similar dropdown type form, or they can submit by just putting their metadata in the system and then uploading a hard copy.

And people had questions about the protections under that, and they may be protected for exclusions or the Trade Secrets Act, and most people have been putting some kind of proprietary stamp on their submission for that purpose. If somebody ever issued a FOIA, then we would submit the request through the solicitor that reviews FOIA requests, and in most cases it would be enough for you just to have designated but sometimes that that could potentially be reviewed. And or the Trade Secrets Act, which you're well familiar with. That's another act with strong protection under the law.

And also, in lieu of that, we do have people that rather than go in the electronic system and use either a spreadsheet method or the form. They submit things directly by hard copy to the Chief of Offshore Regulatory programs, and then one of our personnel scans it up and put it in the system. However, you know when things are scanned like that they pass through an internal e-mail, which means you know again they potentially could be looked at under some kind of a FOIA action. So you may prefer to enter directly in the system. My view is there's a little more protection there when you do that.

And that's pretty much what we have. If you have questions about this, you can send them. I thought we had Daniel's e-mail address that we could send questions to. We also sent out when we sent out this presentation. And we would send out copies of the information as well that you could look at. And can we drop into the chat Daniel's information. [Note: Daniel Puliti's email is Daniel.Puliti@bsee.gov.]

Fischman, Allison (OST) 25:59

Yeah. Thank you, Michael. We'll put Daniel's contact. Daniel Puliti will be the best point of contact for questions about the BSEE specific reporting requirements.

Pittman, Michael 26:13

And I just put his e-mail link in the chat for those of you who might need it, we have stepped a few people through this. It's probably mostly intuitive, but there still could be questions and that way you can reach out to us directly and we can step you through process if it's necessary. All right. Thank you, Allison. Appreciate it.

Fischman, Allison (OST) 26:42

Thank you.

Pittman, Michael 26:44

Thanks everyone for coming.