

2010 SPU OMS Gaps – Ranking Matrix



6	7	8	9	10	High (5)
5	6	7	8	9	Moderate to High (4)
4	5	6	7	8	Moderate (3) IMPORTANCE
3	4	5	6	7	Low to Moderate (2)
2	3	4	5	6	Low (1)
Low Risk + Efficiency Gaps (1)	Low to Moderate (2)	Moderate (3)	Moderate to High (4)	High (5)	

GAP RISK TO THE BUSINESS

DAL OMS gaps V4

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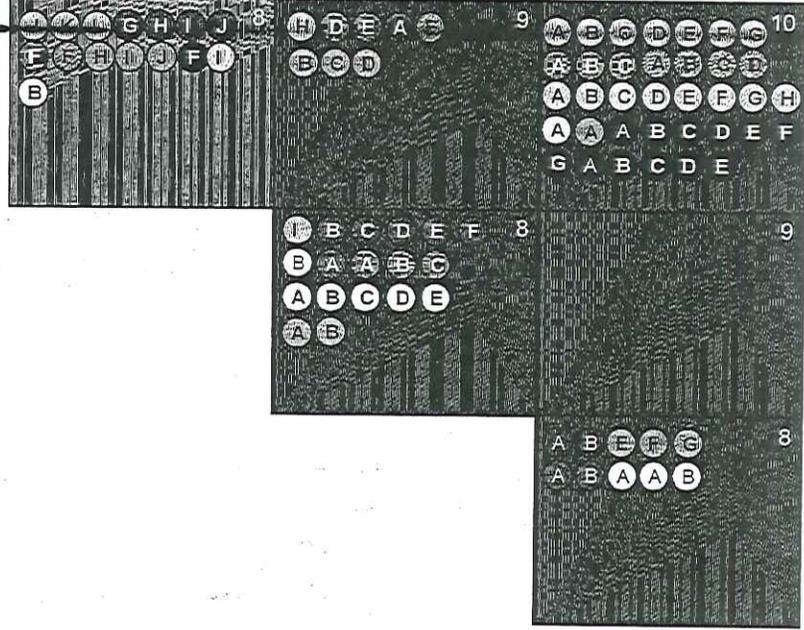
BP-HZN-2179MDL00650169

EXHIBIT NO. 3205

OMS Gap Detail - 8, 9, 10



- 4.1 Procedures & Practices
- 2.2 People & Competence
- 3.1 Risk Assessment
- 3.3 Process Safety
- 7.1 Regulatory Compliance
- 4.2 MOC
- 5.4 Inspection & Maint.
- 2.5 Working w/Contractors
- 4.5 Control of Work
- 4.6 Crisis & Continuity Man & ER
- 4.4 Incident Management
- 6.6 Procurement
- 4.3 Information Mmgt & Document Control
- 6.8 CI
- 2.3 Operating Discipline
- 1.3 Planning & Control
- 1.5 Accountability



2010 SPU OMS Gap assessment



Item	Description	Rank	Area
4.1 Procedures & Practices	A Lack of Procedure review and development •Inconsistent methodology in creating & reviewing Operating procedures (HSSE/E 5,5) •Procedure creation review process not followed (SPU 4,5)	5,5	Logistics / SPU/ HSSE
	B No formal process for verifying the use of procedures in the field	5,5	SPU
	C Lack of culture to use procedures in GoM Update procedures and practices	5,5	HUB (H)
	D STP development / ETP review and adoption	5,5	HSSE/Eng
	E Lack of guidance regarding the creation and review of operating procedures	5,5	HSSE/Eng
	F Lack of content around IM Element 6 for procedures specifically maintenance, Norm Ops	5,5	HSSE/Eng
	G Lack of clarity on procedural authority to sign off on (Ops, EA, HSSE)	5,5	HSSE/Eng
	H Reference drawings and documents attached into procedures are sometimes not updated to "As Built"	4,5	Subsea
	I Procedure standardization and control	4,4	Subsea
	J Lack of formal / new employee training	3,5	Subsea
	K Lack of repository for documentation for procedural admin (& training & communication)	3,5	HSSE/Eng
	L Monitoring & tracking of procedural reviews	3,5	HSSE/Eng
	People & Competence	A Need people resourcing strategy •Challenges filling open roles for operations positions (Subsea 5,5) •Lack of confidence in plan to ensure competent resources to fill and backfill (Hub MD 4,5) •Attrition in SPU needs to be addressed (Hub MD 4,5)	5,5
B Lack of process to assess key operating risk decision makers		5,5	HSSE/Eng
C Need to Create / Review succession plans		5,5	Hub (H)
D Develop career paths for Operations as incentive for retaining & improving competency		4,5	Hub (MD)
E Not enough opportunity for individual growth / personal development		4,5	Hub (MD)
F Succession planning onshore		3,5	SPU

2010 SPU OMS Gap assessment



Item	Description	Rank	Risk
3.1 Risk Assessment & Mgmt	A. Not all assessed risks addressed by appropriate level of management	4.5	Subsea
	B. Lack of entry risk understanding at F, I, and below	4.4	HSSE/Eng
	C. Lack of understanding on major hazards by offshore personnel	4.4	HSSE/Eng
	D. Inconsistent hazard identification at the asset level (MOC risk assessment)	4.4	SPU
	E. Communicating the risk register	4.3	SPU
	F. Lack of environmental expertise in risk assessment conversation	4.2	HSSE/Eng
	G. Lack of clarity / accountability between SPU / GPO regarding risk policy	3.5	HSSE/Eng
	H. Lack of annual gap assessment / lack of compliance of all GPs	3.5	SPU
	I. Lack of OMS gap / audit process	3.6	HSSE/Eng
	J. Inconsistent hazard ID methodology at the Area level	3.5	HSSE/Eng
7.1 Regulatory Compliance	A. No comprehensive compliance listing and no process to continuously check regulatory requirement updates for subsea equipment and operations	5,5	Subsea
	B. Houston based HSSE Compliance tasks not documented in compliance matrix	5,5	HSSE/Eng
	C. Limited knowledge of documented process to identify legal and reg requirements outside of HSSE	5,5	HSSE/Eng
	D. Lack of accountability for identifying regulatory and legal requirements	5,5	HSSE/Eng
	E. Lack of documentation of accountability for performing the compliance tasks in other areas	5,5	HSSE/Eng
	F. Lack of clarity on employees' roles in regulatory compliance	5,5	HSSE/Eng
	G. Verification of compliance	5,5	HSSE/Eng
	H. Not using MoC process for regulatory changes or Intro of new Ops controls	5,5	HSSE/ Eng
	I. Incorrect application of federal drinking water regs	3,5	HSSE/Eng

2010 SPU OMS Gap assessment



Item	Description	Rank	Area
Process Safety	A: Lack of information to provide predictive indication of process safety issues; Lack of clear subsea Ops risk Management; Lack of alignment with Asset in risk management	5,5	Subsea
	B: Activities associated with hydrocarbon risks are not totally understood by Offshore Staff and Engineering	5,5	HSSE/Eng
	C: Lack of supportive evidence that HAZOP actions were being tracked to closure	5,5	HSSE/Eng
	D: Lack of implementation of GP 48-02 HAZOP ETP	5,5	HSSE/Eng
	E: No Operating Authority for 3.3.1	4,5	SPU
	F: Lack of understanding of major Hazard Risk Reduction measures and awareness	3,5	SPU
4.2 MoC	A: No robust system for SPOT (Subsea Production Operations Team) specific MOC's; Inconsistent knowledge of bizflow procedures	5,5	Subsea
	B: Inconsistent implementation of GoM SPU Risk policy in D&C MoC procedure	3,5	HSSE/Eng
5.4 Inspection & Maintenance	A: Existing detailed Subsea equipment MTCE requirements are not linked to a strategy statement (Atlantis Audit)	5,5	Subsea
	B: Inspection program gap closure plans not all complete (closed only for marine, mechanical, pressure systems, topside structural).	4,5	SPU
	C: Lack of closure of GP (32-30) gaps	4,5	SPU
	D: Lack of chemical management strategy	4,5	SPU
	E: No formal QA/QC system for system repairs and mods based on inspection findings	5,3	SPU
	F: Excursions beyond the operating envelope are not formally investigated until a pressure relieving device has operated or the SOL has been exceeded	5,3	SPU
	G: No long term TAR plan to establish TAR budgets Lack of control over MTCE budgets & no transparency /reporting of maintenance budgets	5,3	SPU
	H: QA/QC re-commissioned equipment	3,5	Subsea
	I: No integrated process for documenting Marine Mechanical inspection findings and tracking action closure	3,5	SPU
	J: No inline inspection program in place for GoM owned & operated pipelines	3,5	SPU

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2010 SPU OMS Gap assessment



Item	Description	Rank	Area
2.5 Working with Contractors			
4.5 Control of work			
4.4 Incident Mgmt	A: Lack of alignment of ERP exercises / drills to major risk scenarios	5.3	SPU
	B: Lack of verification and assurance of competencies for offshore tactical response / IM/ICS positions	5.3	BSSSE/Eng
4.4 Incident Mgmt	A: Review of the protection and prevention planning (OPRA) and Detection	5.3	Hub/HMA
	B: Incident response capability not fully in place	5.3	Support

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2010 SPU OMS Gap assessment



Item	Description	Rating	Area
6.6 Procurement	A No ESCM resource to handle contracts, negotiations, warranty claims, verification of terms and conditions of contracts	5,3	Subsea
	B Contractor compliance: need to use preferred suppliers Contract pricing compliance Purchase orders not being initiated	4,4	SPU
4.3 Information management and document control	A No central repository of GoM documents Lack of awareness, definition and usage of confidential / restricted documents / info	5,3	HSSE/Eng
	B Inconsistent application / utilization of document control procedures Lack of understanding on roles and responsibilities for reviewing and updating documents Lack of document revision clarification for documents outside controlled management system	5,3	HSSE/Eng
6.8 CI	A No formal CI culture or organized process - conformance plan delivery requires a culture of CI	4,4	SPU
7.4 Operating Discipline	A No formal process in place for verifying the use of procedures in the field Need to clarify expectations	4,4	SPU
	B Need to ensure 'stop the job' culture is fully embedded, track examples and recognize people	4,4	SPU
	C Training on regulatory requirements / obligations needed for key staff (following gap assessments on understanding of regulations)	4,4	SPU
1.3 Planning and Control	A No activity based planning	4,4	SPU
	B No resource loaded SPU integrated plan	4,4	SPU
	C Inconsistent prioritization methodology across the SPU	4,4	SPU
	D No long term conformance plan	4,4	SPU
	E Recast AP to include incorporating OMS gap closure as critical design element	4,4	SPU
7.5 Accountability	A Employee adhering to financial DOA	4,4	SPU
	B Accountabilities not clearly written and understood	4,4	SPU 7

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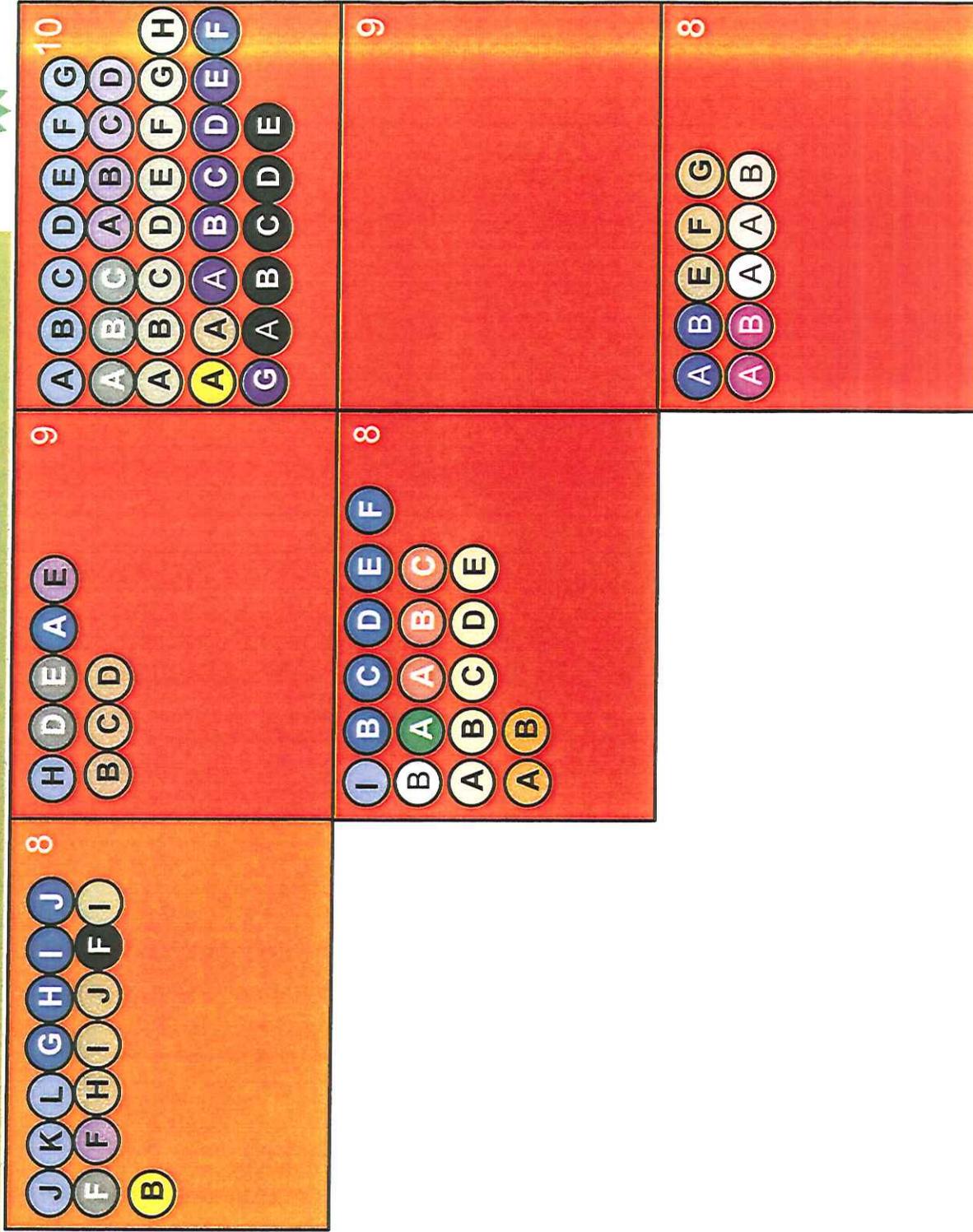
Low Risk + Efficiency Gaps (1) Low to Moderate (2) Moderate (3) Moderate to High (4) High (5)

GAP RISK TO THE BUSINESS

OMS Gap Detail: 8,9,10



- 4.1 Procedures & Practices
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2010 SPU OMS Gap assessment



Item	Description	Rank	Area
4.1 Procedures & Practices	Lack of Procedure review and development	5,5	Logistics / SPU/ HSSE
	<ul style="list-style-type: none"> Inconsistent methodology in creating & reviewing Operating procedures (HSSE/E 5,5) Procedure creation review process not followed (SPU 4,5) 		
	No formal process for verifying the use of procedures in the field	5,5	SPU
	Lack of culture to use procedures in GoM		
	Update procedures and practices	5,5	HUB (H)
	STP development / ETP review and adoption	5,5	HSSE/Eng
	Lack of guidance regarding the creation and review of operating procedures	5,5	HSSE/Eng
	Lack of content around IM Element 6 for procedures specifically maintenance, Norm Ops	5,5	HSSE/Eng
	Lack of clarity on procedural authority to sign off on (Ops, EA, HSSE)	5,5	HSSE/Eng
	Reference drawings and documents attached into procedures are sometimes not updated to "As Built"	4,5	Subsea
	Procedure standardization and control	4,4	Subsea
	Lack of formal / new employee training	3,5	Subsea
	Lack of repository for documentation for procedural admin (& training & communication)	3,5	HSSE/Eng
	Monitoring & tracking of procedural reviews	3,5	HSSE/Eng
2.2 People & Competence	Need people resourcing strategy	5,5	Logistics / Subsea / Hub
	<ul style="list-style-type: none"> Challenges filling open roles for operations positions (Subsea 5,5) Lack of confidence in plan to ensure competent resources to fill and backfill (Hub MD 4,5) Attrition in SPU needs to be addressed (Hub MD 4,5) 		
	Lack of process to assess key operating risk decision makers	5,5	HSSE/Eng
	Need to Create / Review succession plans	5,5	Hub (H)
	Develop career paths for Operations as incentive for retaining & improving competency	4,5	Hub (MD)
	Not enough opportunity for individual growth / personal development	4,5	Hub (MD)
	Succession planning onshore	3,5	SPU

2010 SPU OMS Gap assessment



Item	Description	Rank	Area
A	Not all assessed risks addressed by appropriate level of management	4,5	HUB
B	Lack of entity risk understanding at FLL and below	4,4	HSSE/Eng
C	Lack of understanding on major hazard risk by offshore personnel	4,4	HSSE/Eng
D	Inconsistent hazard identification at the asset level (MoC risk) assessment	4,4	SPU
E	Communicating the risk register	4,4	SPU
F	Lack of environmental expertise in risk assessment conversation	4,4	HSSE/Eng
G	Lack of clarity / accountability between SPU / GPO regarding risk policy	3,5	HSSE/Eng
H	Lack of annual gap assessment / audit of compliance of all GDPs	3,5	SPU
I	Lack of OMS gap closure process	3,5	HSSE/ Eng
J	Inconsistent hazard ID methodology at the Area level	3,5	HSSE/Eng
A	No comprehensive compliance listing and no process to continuously check regulatory requirement updates for subsea equipment and operations	5,5	Subsea
B	Houston based HSSE Compliance tasks not documented in compliance matrix	5,5	HSSE/Eng
C	Limited knowledge of documented process to identify legal and reg requirements outside of HSSE	5,5	HSSE/Eng
D	Lack of accountability for identifying regulatory and legal requirements	5,5	HSSE/Eng
E	Lack of documentation of accountability for performing the compliance tasks in other areas	5,5	HSSE/Eng
F	Lack of clarity on employees' roles in regulatory compliance	5,5	HSSE/Eng
G	Verification of compliance	5,5	HSSE/Eng
H	Not using MoC process for regulatory changes or intro of new Ops controls	5,5	HSSE/ Eng
I	Incorrect application of federal drinking water regs	3,5	HSSE/Eng

3.1 Risk Assessment & Mgmt

7.1 Regulatory Compliance

2010 SPU OMS Gap assessment



Item	Description	Rank	Area
3.3 Process Safety	A	5,5	Subsea
	B	5,5	HSSE/Eng
	C	5,5	HSSE/Eng
	D	5,5	HSSE/Eng
	E	4,5	SPU
	F	3,5	SPU
4.2 MoC	A	5,5	Subsea
	B	3,5	HSSE/Eng
5.4 Inspection & Maintenance	A	5,5	Subsea
	B	4, 5	SPU
	C	4,5	SPU
	D	4,5	SPU
	E	5,3	SPU
	F	5,3	SPU
	G	5,3	SPU
	H	3,5	Subsea
	I	3,5	SPU
	J	3,5	SPU ₅

2010 SPU OMS Gap assessment



Item	Description	Rank	Area	
2.5 Working with Contractors	A	Lack of clarity in accountabilities between HSSE/PSCM in contractor relationship management	5,5	HSSE/Eng
	B	Lack of standardization / documentation of the process for PSCM tendering that incorporates robust HSSE/EA and process safety	5,5	HSSE/Eng
	C	Lack of understanding outside of PSCM of construction management & selection process	5,5	HSSE/Eng
	D	Inconsistent / absent communication of applicable HSSE/EA requirements / specifications of suppliers	5,5	HSSE/Eng
	E	Inconsistent / absent communication of applicable HSSE/EA requirements / specifications to contractor staff	5,5	HSSE/Eng
	F	Lack of systematic process to verify contractor employee competency post initial verification	5,5	HSSE/Eng
	G	Lack of process to confirm contractor embedment of ETPs, SOPs and lessons learned	5,5	HSSE/Eng
4.5 Control of work	A	Lack of rigor in breaking of containment	5,5	HSSE/Eng
	B	Completion of documented risk assessments for routine tasks	5,5	HSSE/Eng
	C	Inconsistent task based approach in JSEA process resulting in process safety hazards / personnel safety individuals	5,5	HSSE/Eng
	D	Insufficient verification of core competency post-training	5,5	HSSE/Eng
	E	Ineffective JSEA process IA/PA competencies	5,5	HSSE/Eng
	F	Personnel involved in ICC's are not always signing in/out or applying personal lock For some isolations locks are applied without the ICC point list or P&ID list in hand	3,5	SPU
4.6 Crisis & Continuity Mgmt & ER	A	Lack of alignment of ERP exercise / drills to major risk scenarios	5,3	SPU
	B	Lack of verification and assurance of competencies for offshore tactical response / IMT ICS positions	5,3	HSSE/Eng
4.4 Incident Mgmt	A	Reviewing Fire protection and prevention - Training, OPRA and Detection	5,3	Hub (HM)
	B	Incident response capability not fully in place	5,3	Subsea

2010 SPU OMS Gap assessment



Item	Description	Rank	Area
6.6 Procurement	A No PSCM resource to handle contracts, negotiations, warranty claims, verification of terms and conditions of contracts	5,3	Subsea
	B Contractor compliance need to use preferred suppliers Contract pricing compliance Purchase orders not being initiated	4,4	SPU
4.3 Information management and document control	A No central repository of GoM documents Lack of awareness, definition and usage of confidential / restricted documents / info	5,3	HSSE/Eng
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