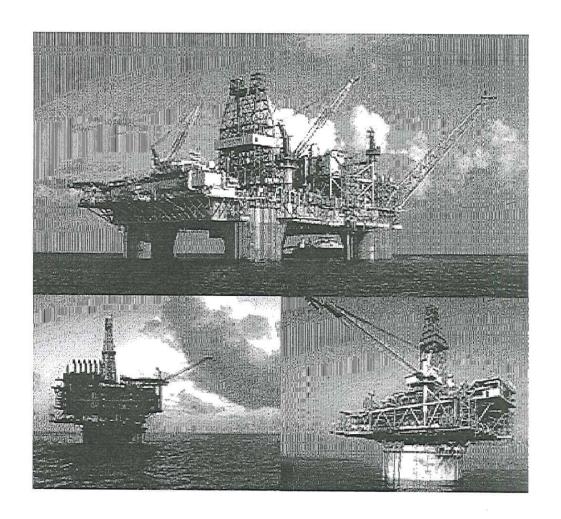
BP GoM Deepwater SPU



January 2010

Well Control Response Guide

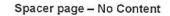


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Assigned to:



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Responsibilities for Well Control Response Guide

1.1 Owner

The Owner is responsible for the Well Control Response Guide. He is responsible for initiating the appropriate programs to ensure awareness and proper use of the Response Guide. The Owner / Holder responsibilities also include the following maintenance activities:

- The review and approval of the Guide as being technically correct with accurate controls in place to recover from well control events safely;
- The management of timely reviews and revisions to the Guide:
- · Participation in audits and reviews of the Guide

Owner

David Rich

SPU Wells Director Date: January 2010

1.2 Custodian

The Custodian is nominated by the Guide Owner / Holder and is responsible for the contents of the Guide. He is responsible for ensuring that revisions and updates are prepared when necessary. The Custodian is also responsible for ensuring that the distribution of the Guide and its corrections and revisions are adequately controlled. Inquiries as to the content of the Well Control Response Guide should be addressed to the Custodian.

Custodian

John Sprague / John Shaughnessy

(Drilling Engineering Authority) / (Well Control TA)

Date: January 2010

1.3 Audit/Review

Reviewing the Well Control Response Guide

It is recommended that the Well Control Response Guide be audited and/or reviewed on an annual basis in January by the SPU Well Control TA, or sooner if there has been a significant restructuring of management personnel within either the Operator's or the Well Control Service Providers' management teams.

Conducting the review

The audit/review will be conducted with representatives from BP, Well Control Service Providers, pertinent third parties and contractors.

Notifying plan holders of changes

Written notices of revisions and/or amendments will be sent to all plan holders of record.

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Training of personnel in use of plan

Personnel will be trained in use of this plan prior to the initial audit. Goal is to train the operational drilling personnel, such as Operations Managers, WTL, ops drilling engineers.

2 Distribution List

Name	Company	Department	Title	Copy Number
Gavin Kidd	BP	Atlantis	WTL - DD2	
Robert Sanders	BP	Atlantis	WTL - DD3	
John Shaughnessy	BP	Atlantis	Ops Drilling Engineer	
Louise Jacobsen Plutt	BP	Atlantis	Ops Drilling Engineer	
Dan Stoltz	BP	Thunder Horse	WTL - Enterprise	
Tony Emerson	BP	Thunder Horse	WTL - PDQ	
Kathleen Halvorson Dory	BP	Thunder Horse	Ops Drilling Engineer	
Eddie Osborne	BP	Thunder Horse	Ops Drilling Engineer	
John Guide	BP	DW Horizon	WTL - Horizon	
Brett Cocales	BP	DW Horizon	Ops Drilling Engineer	3
George Gray	BP	DOC	WTL	
Trent Fleece	BP	DOA	Ops Drilling Engineer	
Dave Schilling	BP	DOA	WTL - DOA	
Greg Walz	BP		ETL	
Charles Taylor	BP		Drlg Eng TL	
Charlie Holt	BP	Atlantis	Wells Ops Manager	
Andy Frazelle	BP	Thunder Horse	Wells Ops Manager	
Bruce Rogers	BP		CTL	
David Sims	BP	DW Horizon	E&A DTL	
Glen Nohavitza	BP		Pride DW Project Manager	
Chuck Ware	BP	Thunder Horse	Ops Drilling Engineer	
Rupen Doshi	BP	Atlantis	Ops Completion Engr.	
Jeff Hupp	BP	Atlantis	Ops Completion Engr.	
Daniel Pickett	BP	Thunder Horse	Ops Completion Engr.	
Mike Fowler	BP	Thunder Horse	Ops Completion Engr.	

Black – BP GoM DWP Personnel
Blue – BP GoM DWP – Contractors

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4 Abbreviation List

ICP Incident Command Post ICS Incident Command System. Internationally accepted command system designed particularl for responding to and recovery from all types of emergency incidents. ID/OD Inside diameter/Outside diameter IMS Incident Management System IMT Incident Management Team Key Personnel With specific job function during a well control event Kick Unintentional Influx of hydrocarbon or water into the wellbore during drilling or workover Kw/m2 Kilowatts per square meter LCM Lost Circulation Material LEL Lower explosive limit: percentage of gas and air mixture that will cause an explosion LOT Leak Off Test M Meters MAASP Maximum Allowable Annular Surface Pressure Medevac Medical evacuation Mmscf/d Million standard cubic feet per day MCDU Mobile Offshore Drilling Unit MSRC Marine Spill Response Corporation MWD Measurement While Drilling NOP Next Operational Period NRC National Response Corporation (US Oil Spill Response organization) Offshore Installation Manager, Sr. Rig Owners Representative if on a MODU On-scene Commander: ICS term. Responsible for on-scene response actions, concerning the well and uncontrolled effluents emitted from the well. Leader of the TRT.	ВНА	Bottom Hole Assembly
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	Authority	MOTA

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POB	Persons on Board (relating to an offshore Installation/Site or MODU)
PPE	Personal Protective Equipment
Ppm	Parts per million
Ramp-up	Act of increasing resources (people and equipment) to better respond to an incident
ROV	Remotely Operated Vehicle
SAR	Search and rescue
SBSA	Shore Based Support Area
SCBA	Self Contained Breathing Apparatus
SDE	Senior Drilling Engineer
SOP	Standard Operation Procedure
SC	Source Control, relates to controlling the source of the effluent
SCBD	Source Control Branch Director. Responsible for source control activities onsite
SCSC	Source Control Section Chief. Responsible for all source control activities
SCSSSV	Surface Control Subsurface Safety Valve
Source Control Team	Team formed after an event has occurred. The team's function is stopping the flow of hydrocarbons at the source. Name originates from ICS and oil spill terminology.
TCP	Tactical Command Post (operation command post at the incident scene)
TRT	Tactical Response Team (onsite team responding to incident including Source Control)
VVM	Wells Manager
WSL	Well Site Leader (onsite BP company representative)

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5 Introduction

5.1 Abstract

This manual is applicable for the BP Gulf of Mexico Deepwater Business Unit (GoM DWP BU). It is a guide to ensure that an organized Source Control response to a well control event is brought swiftly and efficiently into action.

This manual provides a working methodology to safely and effectively manage an initial response to a well control incident. This would normally cover the first 48 hours until dedicated control and recovery teams are formed and well control specialists are on location. The plan goal is to provide guidance to:

- Safeguard human life When primary well control is lost, it is essential to control site safety; safety of third parties and the safety of those directly involved with the well control operations. This is ensured by efficiently and effectively conducted control efforts.
- Minimize primary well control escalation to ensure minimum damage to the well, rig, surface facilities and location. Establish levels and definitions of Well Control Incidents to avoid arbitrary decisions of when to get the Incident Management System activated.
- Create an initial response team to demonstrate "Command and Control" of the incident in the eyes of the public, partners and personnel.
- Minimize logistics and Source Control problems unique to deepwater GoM and its environment.

5.2 Special Command and Control Considerations for MODU Operational Environments

Within the GoM DW SPU, some drilling/well operations are conducted on a Spar Platform or similar moored facility in which the Command /Control and Communication responsibilities from the well site up through to the Corporate level are virtually wholly within the BP organizational footprint, due to BP ownership in the "facilities" on which the drilling operations are conducted. Therefore, unity of command readily facilitates tremendous efforts and assets focused to accomplish BP's primary objectives to safeguard life, protect the environment, protect BP and third party assets and maintain/protect BP's image and reputation. However, on certain deepwater projects, drilling operations are conducted with a Mobile Offshore Drilling Unit (MODU). Since the MODU is indeed a vessel and not owned by BP, the MODU Rig Manager/OIM will in fact assume the initial role of On Scene Commander instead of a BP employee (WSL or BP OIM) as would be the more common case.

This subordination of the onsite BP representative to the MODU OIM should not diminish the efforts to achieve BP's primary objectives stated above. The intent of this document is not to specify the exact division of responsibilities in this situation, but to convey the principals of operation of the BP Incident Management System so that development of the site specific Well Control Contingency Plan (which may require a Non-BP party to be the initial On Scene Commander) can be accomplished within the intent of BP's Senior Management directives.

Within this document the term OIM (Offshore Installation Manager) which generally implies a BP employee, may indeed be the Rig Manager/OIM (As Applicable to the Situation). Once again, the Site Specific Well Control Contingency Plan must specify a division of responsibilities and support within the MODU Contractor/BP drilling team.

5.3 Document Objectives

The objective of this Guide is to provide clear concise instructions to key personnel in the event of a well control incident that are compatible with BP's tiered emergency response system. This will include the call out procedures and Incident Management Team (IMT) formation for a well control emergency. In addition:

Provide guidelines for BP and contractor staff in response to an emergency well control event.

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- Inform BP management, other departments and staff of their responsibilities and set out the procedures they should follow in a well control related emergency event.
- Define the type of support that may be required from the various departments and sections within BP and the support that may be required from contracted vendors.

It is not envisaged that the Well Site Leader (WSL) or the Installation/Site/Rig OIM (As Applicable) becomes an expert in response for loss of well control; however personnel onsite must have response guidance in the event of a well control emergency. It is also realized that every well control event is unique and response and mitigation actions must be tailored to suit.

This document is intended to be a quick response users guide with a minimum of pages and therefore contains minimum background and supporting information. This document provides guidance for initial team response and considerations for 'Personnel with Response Duties' both on and off scene. They are neither prescriptive nor exhaustive. Not all actions will be applicable in all cases. Others may be required. Provided the WSL/OIM (As Applicable) makes the correct initial contact and gives the necessary basic emergency details, the BP response should follow on automatically and the Guide will have served its primary purpose. For obvious reasons, Key Personnel should study this document prior to a well control emergency.

Other related "Well Control Contingency" documents will exist as part of the overall well control response and recovery plan. These plans may include details on managing; designing and executing a well control project both for surface and subsurface intervention as well as engineering studies evaluating loss of well control hazards and risk. These documents are meant to familiarize the DWP Wells Team on the planning process and would be utilized after the initial control teams are in place. See Figure 5-1 below.

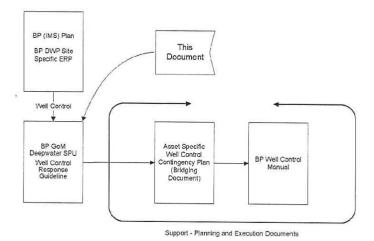
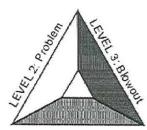


Figure 5-1: Well Control Response and Control Planning Documents

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5.4 How to Use This Manual - Personnel with response duties



LEVEL 1: Routine

Step 1: Make sure you are familiar with the three different levels of well control events as follows:



Level 1 - Routine Well Control Event.

- Recovery is possible following site technical practices (STPs) and standard operating procedures (SOPs) using onsite personnel - e.g. well kick with pipe on bottom,
- · Incident can be contained onsite.
- BP personnel, public, environment and property are not at serious risk.
- "Site Emergency"

Level 2 - Non-Routine Well Control Event



- There is a complication with the well control incident.
- No STP or SOP is available for recovery or risk/impact of escalation is high e.g. stripping under pressure, massive loss of circulation with hydrocarbon zones open, H₂S kick, approaching MAASP.
- · Personnel or environment are at greater risk.
- · There is a high risk of escalation
- Deteriorating Level 1 event.

Level 3 - Loss of Well Control

- Loss of secondary well control.
- Requires immediate response to safeguard life and environment.
- · Outside resources will be necessary for mitigation and control.
- Site evacuation is usually necessary.
- · Deteriorating Level 2 event

Make sure you have clearly noted the key contact telephone numbers for well control emergencies as recorded in the BP Incident Management Plan and Well Control Contingency Plan.

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- Step 3: Look over the flowcharts and notes for each level of a well control event. Make sure you are aware of your own role. If any actions are unfamiliar or unclear contact the Manual's Custodian for clarification or training.
- Step 4: Well Site Leader/Offshore Installation Manager (WSL/OIM (As Applicable)) Make sure other key personnel on your rig are aware of the Guide's principles.
- Step 5: WSL/OIM (As Applicable) Verify this Guide is located at appropriate communication points.
- Step 6: WSL/OIM (As Applicable) Hold drills as necessary to assure key personnel understand their roles.

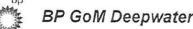
5.5 Emergency Priorities

The WSL/OIM (As Applicable) and the Initial On-scene Commander (OSC) shall always keep the following priorities in mind when planning response actions:

- 1. SAFEGUARD LIFE
- 2. PROTECT THE ENVIRONMENT
- 3. PROTECT COMPANY/THIRD PARTY ASSETS
- 4. MAINTAIN COMPANY IMAGE AND REPUTATION

No attempts should be made to protect the environment or property if the Initial On-scene Commander is not sure of the safety risks to which untrained responders may be subjected. If unsure, all efforts should be focused on safeguarding life by clearing the area of personnel and maintaining an exclusion zone until trained responders are on the scene.

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5.6 Well Control General and Operational Incidents

5.6.1 Well Control emergencies are generally divided into two categories as follows:

General Incidents

- · Serious injury, illness or death
- · Major fire or explosion
- Radiation or explosives incident
- · Oil or chemical spill
- Extreme weather
- · Violent crime, terrorist activity

In the event of a General Incident the focus is on safeguarding life and protecting the environment and assets and the response will always be through the OSC and IMT-Incident Commander.

In a well control situation, a General Incident may occur in combination with the Operational Incident. In this circumstance, the main priority of the WSL (OSC) and rig contractor's Sr. Toolpusher is to safeguard life, environment and assets until a dedicated recovery team is established. The initial function of the IMT will focus on all aspects of the General Emergency. In due course a dedicated Source Control Team will be formed inside the IMT and will focus strictly on the technical and operational aspects of regaining control of the well and recovery from the event.

Operational Incidents

- Level Well Control Event (Routine Primary) Control Compromised - e.g., Well Kick)
- Level 2 Well Control Event (Non-Routine -Escalation)
- Well Control Event (Loss of Well Control)
 - · Phase 1: Initial response
 - Phase 2: Surface intervention operations
 - Phase 3: Subsurface intervention operations
 - Phase 4: Recovery

In the event of an isolated Operational Incident the focus is on technical and operational aspects of regaining control, and line of command may be WSL. Sr. WSL, DTL, OTL of the asset, Wells Manager depending on the asset and severity of the incident and in consultation with BP Wells Team Leader or designate of IMT - Incident Commander.

In the event of a Level 1 or Level 2 Well Control Event, the WSL will elevate the Alarm by contacting the OIM (As Applicable) and his line supervisor (OTL, DTL or WTL and the PU Well Control SPA). The MODU/Site/Facility OIM (As Applicable) will inform his line manager (Asset Operations Manager) and he will contact the asset OTL/DTL or Wells Manager as appropriate and will then form an "IMT" to assist the WSL until recovery is complete.

In the event of a Well Control Event, the WSL/OIM (As Applicable), following procedures laid out in the "Incident Management Plan", escalates the Alarm with BP. The OIM becomes the OSC.

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5.6.2 Phases of Level 3 Well Control Response

Phase 1:

Phase 1 is the initial reaction to the well-control emergency.

Initial Response It commences when a potential level 3 well-control incident occurs. It ends when the On-Scene Commander officially declares Level 3 status on the

emergency.

Phase 2:

Phase 2 is the well-control operations phase of the well-control emergency.

Surface Intervention This phase begins when the well-control incident is designated Level 3. It

ends when the well has been brought under control.

Phase 3:

Phase 3 is the relief well planning and drilling phase of the well-control

emergency.

Subsurface Intervention

It begins when the Deputy Incident Commander (DIC) approves the drilling of a relief well as part of the well-control project. It ends when the out-of-

control well is intersected and effectively killed through the relief well.

Phase 4:

Phase 4 is the well recovery phase of the well-control event.

Well Recovery Operations

This phase begins when the well or event is brought under control. It ends when normal operations, i.e., drilling, testing, workover operations, etc., are resumed from before the well-control incident.

Phase 5:

Phase 5 is the post-incident evaluation phase of the well-control emergency.

Post-Incident Evaluation

This phase begins with the completion of Phase 4. It ends when the final report and briefing on the well-control incident occurs between Well Control

Service Provider and the BP Deputy Incident Commander.

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6 Well Control Incident Classification

To assure an adequate response is mounted, key personnel will be required to classify the well-control incident level. This will initially be the responsibility of the WSL in consultation with his line supervisor and the OIM (Applicable). The following section defines the levels of various well control incidents. There may be gray areas as you classify some incidents on the boundaries between the levels. Depending on ones knowledge and experience different people may classify the same incident in different categories (e.g., an experienced WSL with extensive well control experience might classify an incident as a Level 1 and another with little experience may classify the same incident as Level 2). If uncertain, always classify in the higher category (over react) and then ramp-down if necessary.

A general guide for well control classification follows:

- 1) Level 1 Primary barrier is not sufficient or is compromised.
 - a) Standard procedures exists for recovery
 - b) Low risk (impact x probability) of escalating complications
 - c) Recovery may be accomplished with onsite resources (personnel and equipment)
 - d) SPU Well Control TA is notified.
- 2) Level 2 Loss of primary barrier
 - a) Recovery requires non-standard/non-routine procedures
 - b) High risk (impact x probability) of escalating complications
 - c) Recovery will require offsite resources (personnel and/or equipment)
 - d) SPU Well Control TA assistance is requested
 - e) Segment Well Control TA notified
- 3) Level 3 Loss of secondary barrier
 - a) Uncontrolled release (loss of containment surface or underground)
 - b) Impending loss of control
 - Recovery will require specialist resources, non-routine procedures and IMT ramp-up to included assistance and consultation with Segment Well Control TA.



Level 1 Well Control Incident - Routine Well Control

6.1 Level 1 - Well Control Incidents

6.1.1 Definition

A Level 1 Well Control Incident is defined as a situation in which:

- Primary well control is lost (influx of formation fluids in a drilling or workover operation), requiring secondary controls to prevent an uncontrolled release of wellbore gas or fluids (e.g., closing BOP). Or, loss of one of the two required barriers in a production, completion or workover operation (e.g., loss of SCSSSV or leaking inboard valve). Or,
- Conditions exist, prior to loss of primary control, which would complicate and potentially escalate recovery (circulating out the influx). And >
- There should be a standard operating procedure (SOP) for recovery.

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- Recovery should have minor consequences if there is no further escalation.
- On-site crew should be trained and capable of recovery operations.
- Risk of an uncontrolled release is minimal.

6.1.2 Examples

Loss of Primary Well Control during Drilling

- □ Kick while drilling with bit on bottom or swab during connection. Kick volume and intensity is within kick tolerance limit and should be circulated without exceeding MAASP. Chemical and mud supplies are adequate. A SOP is available for recovery. The Crew is trained and capable of circulating the kick. There are no other apparent complicating circumstances. Caution: This incident would be classified Level 2 if H₂S were possible in the influx.
- Swabbed in influx while tripping. Kick volume is within kick tolerance limits. The pipe will have to be stripped back to bottom to circulate out the influx. A basic SOP exists for recovery. Stripping will have to be done through annular BOP or ram-to-ram. Chemical and mud supplies are adequate. There are no other apparent complicating circumstances. The Crew is trained and capable of stripping the pipe back to bottom. Caution: This incident might be classified as a Level 2 if; the crew has limited experience in stripping pipe under pressure; the BOP is in danger of failure during stripping tool joints; an adequate trip tank is not available to monitor small volumes of fluid during stripping; the influx may contain H₂S or the inflow potential is very high. The WTL will make the final decision.

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Level 2 Well Control Incident - Non-routine Well Control

6.2 Level 2 - Well Control Incidents - Potential Loss of Control and/or High Risk

6.2.1 Definition

A Level 2 Well Control Incident is defined as a situation in which:

- Primary well control is lost requiring secondary controls to prevent a loss of control (e.g., closing BOP).
 Or, loss of one of the two required barriers in a production, completion or workover operation (e.g., loss of SCSSSV or leaking inboard valve). And >
- Conditions exist which would complicate and potentially escalate recovery. And/or >
- There is not a standard operating procedure (SOP) for recovery. And/or >
- Escalation occurred during attempted recovery from Level 1 Incident. And/or >
- On-site crew is not trained for recovery operations. And/or >
- Event impact is high (e.g., H₂S, massive pollution, loss of facility, 3rd party causalities)

6.2.2 Examples

Example conditions paired with hydrocarbon Influx. If any of the following conditions occur with a Level 1 Incident, the events will be considered Level 2.

Mud and chemical supplies below predetermined adequate levels	Impending severe weather
Kick tolerance below a predetermined critical level	Loss of critical well control equipment
Casing wear that is greater than predetermined critical values	Loss of circulation greater than 10 bph
Loss of critical well control personnel	Major Rig Failure

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Example with a Le	e conditions paired with initial evel 1 – Incident, the events will be	com e cor	plications. If a sidered a Level	iny of the following 2.	ing (example conditions occur
	Kick with no pipe in hole		☐ Ki	ick with very high	shu	ut-in pressure
	Kick while tripping, cannot strip to	bot	tom 🛭 G	as flow after cen	nenti	ing
	Kick with bit or string plugged		□ A	ny Kick with pote	entia	I H ₂ S
	Kick while running casing or liner		□ v	ery high volume	gas	kick
	Kick with simultaneous losses		☐ Ki	ick with hole in d	rill s	tring
Example condition	e conditions paired with escalans occur with a Level 1 - Incident, Maximum Allowable Surface Pressure Exceeded	tion the e	s during Level events will be cor Suspected Und Cross Flow	nsidered Level 2.	any	of the following example Small Leak in BOP or wellhead
	Small Leak in Drillpipe Kelly Valve or stem		Gas Hydrate Ice Formed	e Plug		Choke Plugged or Cut- out
	Drillstring Washout		Dropped Drillstr	ring		Sheared Drillpipe
	Loss of BOP Controls		Major Rig failur	е		
	Level 3 Well Control Incid	den	t – Release o	r Impending	Los	ss of Control

6.3 Level 3 - Well Control Incident - Release or Impending Loss of Well Control

6.3.1 Definition

A Level 3 Well Control Incident is a release or impending loss of control. The well is flowing uncontrolled to the surface, seabed or confirmed flow underground.

An impending loss of control is a scenario where the loss of secondary control is judged imminent and risk to personnel and property justify abandoning the location.

Identifying the severity of the release is not critical at the initial stage. If there is uncertainty as to a "leak" being uncontrolled flow, the leak should be classified as a release if the on-scene crew cannot or are unwilling to attempt to control the leak. A sustained underground flow will normally be classified as a Level 3 Incident if diagnostic data indicate that is the case (either pressure data or wireline logs) because of the high risk of escalation to an uncontrolled surface release.

6.3.2 Level 3 - Loss of Control Examples

- A confirmed underground flow with low probability of gas broaching to the surface. Confirmed subsurface flow with high probability of broaching to the surface near or under the rig. Shallow leak point.
- Subsurface flow that has broached to surface and is currently at an apparent safe distance away from the rig. The position of the broach may be up, down or cross wind.
- Subsurface flow that has broached under the rig.
- Surface release through the drillpipe with: (a) ignition overpressure and fire; (b) no fire.
- Surface release through a valve or flange with: (a) ignition overpressure and fire; (b) no fire.
- Surface release through the annulus with: (a) ignition overpressure and fire; (b) no fire.

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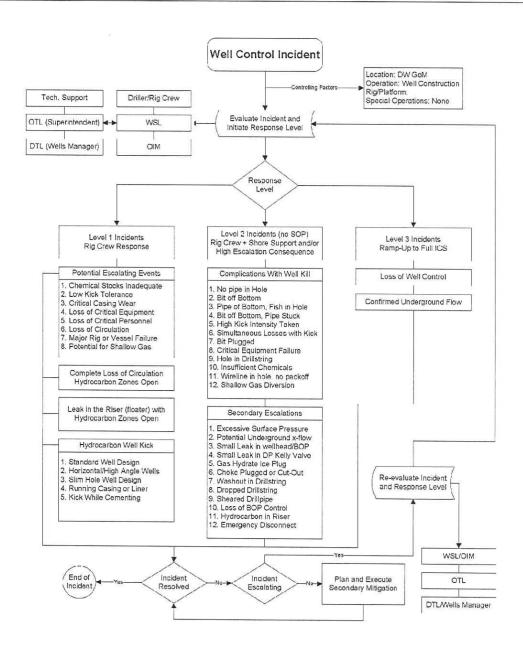


Figure 6-1: Example Well Control Incident Classification Chart

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7 Team Response



Level 1 Well Control Incident

7.1.1 Introduction - Level 1 Well Control Incident Response

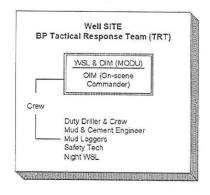
A well control event rarely occurs without warning, particularly in drilling, completion and workover environments. Typically, they are initiated as a loss in primary control (an influx is taken into the wellbore) requiring secondary barriers (BOPs) to be closed to contain the flow. If an STP/SOP exists to recover from this event it would be classified as a Level 1 Incident. Refer to Section 6 for additional details regarding incident classification.

The following section is a top-level guide for key responders in the event of a Level 1 well control incident. This guide is not intended to cover detailed technical aspects of kill and recovery procedures, but instead to provide a structure for organizational ramp-up should conditions associated with the kill operation deteriorate into a Level 2 Incident. Each incident will be unique, and a step-by-step procedure to cover all circumstances is not practical. All steps may not be covered while other steps not covered here may be required.

The first step in the process is for the WSL to classify the Incident given guidelines in Section 6.

7.1.2 Well Control Incident Management Team

Figure 7-1 shows an example response team organization for a Level 1 Well Control Incident with influx at both the well site and Houston Office. A Site/Facility specific BP ERP governs all BP GoM Site/Facility emergency response command and control procedures. These plans all follow the guidelines laid out in the BP IMS using the ICS and specify their local Tactical Response Team. The MODU/Site/Facility OIM is responsible for the all the POB and the asset and will fill the role of OSC in the event of a well control incident. The WSL would fill the role of Source Control Branch Director for an incident occurring during drilling or completion and would liaison directly with the Source Control Section Chief (qualified person from the Wells Team) to devise a strategy to regain control of the well. The SPU Well Control TAshould be notified and be prepared to provide technical assistance as needed.





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Figure 7-1: Example of Level 1 Well Control Response Teams for rig site and OC.

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Level 2 Well Control Incident Response Guide

7.2.1 Introduction - Level 2 Well Control Incident Response

The following section is a top-level guide for key responders in the event that an existing Level 1 well control incident deteriorates into a Level 2 incident. The guide is not intended to cover detailed technical aspects of recovery, but to provide a structure for organizational ramp-up to respond to the increased risk associated with a Level 2 situation. Each incident will be unique; a step-by-step procedure to cover all circumstances is not practical. All steps may not be covered while others may be required. This guide will supersede any of the Contractor's Emergency plans.

The first step in the process is for the WSL to classify the Incident as Level 2, given the guidelines in Section 6.

<u>Important</u>: The situation must be evaluated and remedial actions taken as quickly as possible to prevent escalation to a Level 3 situation.

7.2.2 Well Control Response Team

The response team organization is critical. Within a short time period, they must diagnose the situation and devise and execute a response plan. Otherwise there is a risk that the situation can escalate into a significant event. The SPU Well Control TA shall assist the Response Team in formulation of a response plan. The Segment Well Control TA will be notified and be prepared to assist as requested. Figure 7-2 shows an example response team organization for a Level 2 Well Control Incident.

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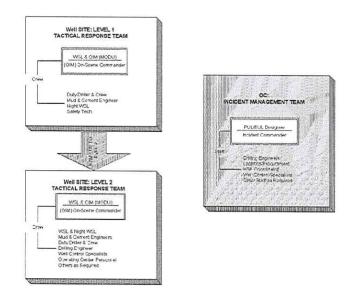


Figure 7-2: Example of Level 1 Well Control Response Teams escalating to level 2

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Level 3 - Well Control Incident Response Guide

7.3.1 Introduction Level 3 Well Control Incident Response

A Level 3 Well Control Incident is where all well control barriers have been lost and the well is out of control, either at surface or underground. In a well control situation the response teams will ramp up based on the severity of the event and where General Emergencies exist simultaneously with the incident. However, for any Level 3 Incident, the SPU Well Control TA and Segment Well Control TA shall be available to provide technical assistance to the response team.

The following section is a top-level guide for key responders in the event that an existing Level 1 or Level 2 well control incident has deteriorated into a Level 3 event. The guide is not intended to cover detailed technical aspects of recovery, but to provide a structure for organizational ramp-up such that recovery can be achieved while dealing adequately with the hazards associated with well conditions. Each incident will be unique; a step-by-step procedure to cover all circumstances is not practical. All steps may not be covered while others may be required. Unless contrary to laws governing Safety of Life at Sea for sea-going vessels or resolved with joint site specific plans, this guide supersedes any of the Contractor's Emergency plans.

The first step in the process is for the OIM to classify the Incident as Level 3 event, given the guidelines in Section 6.

7.3.2 Well Control Initial Tactical Response Team

Four functional teams collectively constitute the BP incident response and crisis management organization. These are:

- 1. Tactical Response Teams (TRT) to implement incident response tactics at well site
- 2. Incident Management Teams (IMT) to carry out incident response operations in Houston
- 3. Business Support Team (BST) to carry out crisis management operations at the business level
- 4. Group Crisis Team (GCT) in London to coordinate corporate crisis management operations.

The above teams are organized and act in a manner consistent with the organizational and management principles of the Incident Command System (ICS). Members of these teams have pre-defined roles and responsibilities.

An example initial TRT could be similar to that shown in Figure 7-3 (Well Control Source Control Team for surface and subsurface intervention) or Figure 7-4 (for a relief well only), depending on how fast the escalation progressed and the status of the Level 2 response organization. The GoM DWP Wells Operational Guidelines, Section: Well Control Source Control Support document provides additional information regarding Source Control Organization.

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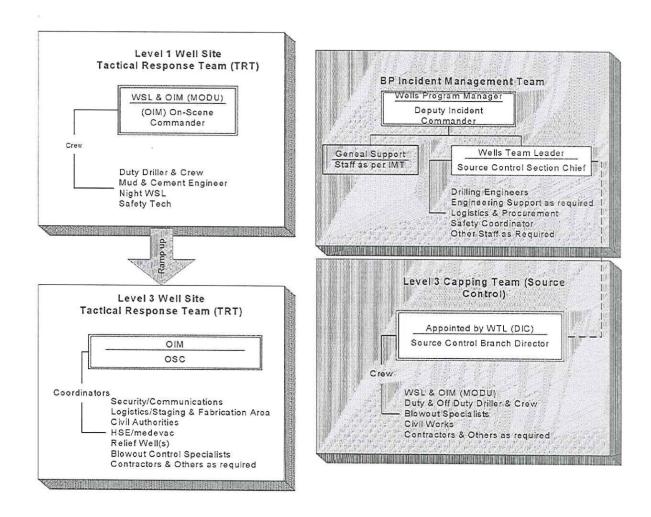


Figure 7-3: Example Level 3 - Well Control Response Source Control Team with Surface Intervention, at well site and Houston

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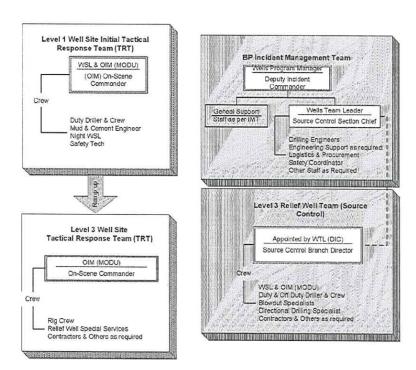


Figure 7-4: Example Level 3 - Well Control Response Team Relief Well Intervention

7.3.3 Example Ramp-up to Level 3

- OIM assumes the role of Initial On-scene Commander, until relieved by either the Sr. WSL, FS, WPM, WTL and /or OTL and forms Tactical Response Team (TRT).
- Make notification as per BP Incident Management Plans, specifically "Emergency Action Plans –GoM DWP Operations Center.
- Well Teams Leader or Wells Ops Manager may assume the role of On-Scene Commander (OSC) and will form a Source Control Team based on the circumstances and resources available following the ICS recommended organization format. This team will focus exclusively on the technical issues for regaining control of a well control event.
- WTL would logically become the Source Control Section Chief (SCSC) for a significant well control event.
- The OSC may send a team to relieve or assist the initial SCSC and TRT depending on circumstances of the severity of the event and perceived impact on the business unit.
- The teams will evolve depending on circumstances of the event. For example, BST and/or IMT team may stand down or reduce dedicated staff if there are no General Emergencies. Source Control Team will organize into Surface Control and Sub-surface Intervention Teams after the arrival of the well control specialists. If an oil spill is on-going then a spill clean-up and recovery team will be formed as needed.

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☐ The IMT would likely be split between physical locations in GoM DWP and Houston depending on function and requirements.

7.4 On-Scene Commander Support Information

7.4.1 General

The following sections supply information specific to the Initial On-Scene Commander (OIM (As Applicable)/OSC) and if loss of well control occurs on a stand-alone MODU, the Emergency Response Coordinator (WSL). If the loss of well control incident occurs on a manned Site/Facility, the OIM will follow the Site/Facility specific ERP, however, the general information in this section will be of value. This section is written to more fully expand the checks provided in the body of this guide. The information is primarily for floating operations. Again, each well control event is specific and all situations require common sense and sound judgment. These sections are included to assist in the decision making process.

7.4.2 Basic Emergency Equipment

Prior to the commencement of any activity, the following prerequisites are necessary.

- □ All escape capsules (minimum 200% of maximum occupancy) must be in a state of deployable readiness and regularly inspected & maintained.
- □ All life rafts (minimum 150% of maximum occupancy), with either rope ladders or knotted rope access lines, or davit launched, must be in a state of deployable readiness on the installation.
- □ Full evacuation capability from the rig must be proven by means of formal risk assessment and practical emergency exercise, prior to drilling operations.
- □ All life jackets (150% of maximum occupancy) must be serviced and available on the installation.
- ☐ The public address system must be fully functional and interconnected between all areas of the rig.
- ☐ All Fire/gas detection systems on the rig, must be fully functional and subject to a suitable test program, prior to any work activities being carried out.

7.4.3 Initial On-scene Command Responsibilities

In an emergency situation a single person should be in command of on-scene response actions. This can get complicated in an offshore situation with contracted MODU, support vessels and helicopters. In the event of a well control incident on a stand-alone MODU the BP WSL is responsible for the well, escaping effluent (oil, gas, water), and the effects of that effluent on third parties and the environment on and away from the site. The contracted MODU OIM is responsible for the safety of all the personnel on board their vessel and for the MODU assets and generally for a 2 mile exclusion zone around the MODU and will assume the ICS role of On-scene Commander for the MODU. The same is true of support and intervention vessel captains and helicopter pilots with respect to their vessels and helicopters.

If the loss of well control occurs on a BP Facility, the OIM will assume the role of OSC and will take all responsibility with respect to emergency response.

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7.4.4 MODU Owners OIM - On-scene Commander

For stand-alone MODU Loss of well control events, the MODU's OIM has overall responsibility for safety on the rig. All activities carried out on board the rig and within the exclusion zone around the location, come under his jurisdiction and may only take place with his knowledge and agreement. He reports to the onshore contractor MODU Manager. His reporting line does not overrule his legal authority to take whatever action he deems necessary to safeguard personnel on board the installation.

For any incident involving the Contractor's rig, particularly involving Safety of Life at Sea and safety of rig and equipment, the control of the offshore emergency response will be taken by the contractor's organization under the authority of the MODU OIM, in accordance with the established procedures contained in a rig specific Emergency Preparedness Manual. The OIM is accountable for the health and safety of all personnel on board at ALL TIMES. The Rig Emergency Procedures Manual and Emergency Contingency procedures will apply at all times to the control of incidents on the Rig itself.

Organized response to an emergency will depend upon the particular scenario but in general terms, Contractor's Rig personnel, would directly respond to emergency involving rig equipment and services provided by the rig contractor, e.g. Pump Unit, ROV, etc.

The MODU OIM is responsible for all activities in connection with the operation of the rig and training in the requirements of emergency response. This includes exercises to ensure the processes and procedures are effective. The MODU OIM shall ensure that the procedures in place are followed, and notify the BP Company Representative (WSL) on board of any situation that may affect the safety of the rig or personnel or of any other emergency situation. A designated competent BP supervisor must be at the site of activity and shall be designated as the BP Representative (WSL).

The Contractor OIM will be responsible for notifying external authorities, as appropriate to local requirements, of a state of emergency on the rig. This includes raising the alarm and alerting local rescue services on marine emergency frequencies and 3rd party vessels or installations in the area. The Contractor and service companies shall be responsible for discharging their respective liabilities with regard to next of kin notification. BP will take the lead in notifications with the MMS in as so far as discussions of the wellbore issues.

Service company personnel offshore will comply with the Rig Emergency Contingency Procedures. In emergencies, their shore base organizations will set up communications with the BP ERC, and comply with the BP ERC procedures.

In the event of a well control emergency, the MODU OIM shall be overall in SOLE CHARGE of the rig and will coordinate emergency response efforts in liaison with the BP offshore Emergency Response Coordinator (WSL). As soon as an emergency situation develops, the MODU OIM shall notify the BP offshore supervisor immediately. The MODU OIM shall also notify his onshore management. During an emergency, the rig OIM's authority for safety of personnel and the rig is defined within the 2 mile exclusion zone around the installation. External to this and, dependant upon prevailing circumstances, the Incident Command may be delegated to other authorities (for

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example the stand by/Support Vessel Captain). All major incidents of this nature will be managed by the MODU OIM, who shall follow the rig specific emergency procedures and will be supported from BP's ICP. This shall include the necessary transportation, equipment and facilities needed.

If the loss of well control occurs on a Spar or BP owned facility, the Site/Facility OIM will assume these duties and will follow their Site/Facility specific ERP.

7.4.5 BP WSL - Standalone MODU

If the loss of well control incident occurs on a stand-alone MODU, the BP Offshore Well Site Leader (WSL) is responsible for ensuring all activities are carried out in a safe and efficient manner at the location and for proactively promoting the health, safety and welfare of all personnel on the Rig. He will ensure that all work programs are carried out to the appropriate standard, and in a timely manner, without injury or risk to any person working offshore, whilst giving due consideration to BP's Reputation. He is also responsible for the safe implementation of the drilling/completion program through the Contractor's Senior Toolpusher and service company personnel. He reports directly to the BP onshore Exploration Wells Team Leader.

The WSL at the site of an offshore Emergency incident shall be designated as the BP Emergency Response Coordinator. The Emergency Response Coordinator will liaise and direct the efforts of the onshore BP emergency response team.

In the event of an emergency, the Emergency Response Coordinator will liaise with the Contractor Offshore Installation Manager (MODU OIM) and will be the offshore focal point for relaying information to the BP onshore Incident Management Team (IMT) and for requesting/directing any specific assistance.

Onshore, the arrangements set out in the BP IMS, will have primacy over the Rig Contractor's and service company's plans for onshore call-out, incident support, communication routes, personnel movements, evacuation arrangements and press releases. A dedicated Emergency response room will be made available in the BP office, for the purposes of dealing with offshore emergency incidents. The facility will be equipped with suitable communication devices to allow free communications with offshore facilities in the event of an emergency incident. There will be clear procedures in place for the mobilization of the emergency response center with roles and responsibilities clearly identified.

The rig contractor and associated service companies must be able to demonstrate their own suitable and sufficient independent arrangements and facilities, where onshore interactions and interfaces are required with BP.

During an emergency, rig onshore/offshore communications will be routed as outlined in Figure 7-5: GoM Incident Notification Procedure for Well Release. Reporting of oil spills and other pollution incidents including a Level 3 well control event will follow the same communications routing as for other emergency events. Nothing in these arrangements, in the event of a stand-alone MODU emergency, will supersede the MODU OIM's duties to: raise the alarm and alert local coastguard services on marine emergency frequencies; submit statutory reports to local regulatory authorities as required.

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In a loss of well control incident, during drilling/completion and/or rig related operations on a standalone MODU, the MODU OIM (As Applicable) will assume the role of OSC (with respect to the MODU and POB) until the MODU POB are safely evacuated or the MODU has disconnected from the wellhead and pulled off location and is no longer in danger. In the event of emergency evacuation the WSL will support the MODU OIM in those actions and will additionally assume the duties of an emergency response coordinator for offsite response. Depending on the evacuation or pull/drive-off scenario, the BP WSL will take on the role of the leader of the TRT until relieved.

The same situation will apply if the BP WSL is physically located on a contracted supply vessel or helicopter in the immediate vicinity of the well. He will continue to assume responsibility for the loss of well control related response. The vessel Captain remains responsible for the safety of all the personnel on board the vessel. His authority with respect to the vessel and its personnel (e.g. spray water or move his vessel out of a perceived danger area) will supersede that of the BP WSL, while on board the vessel.

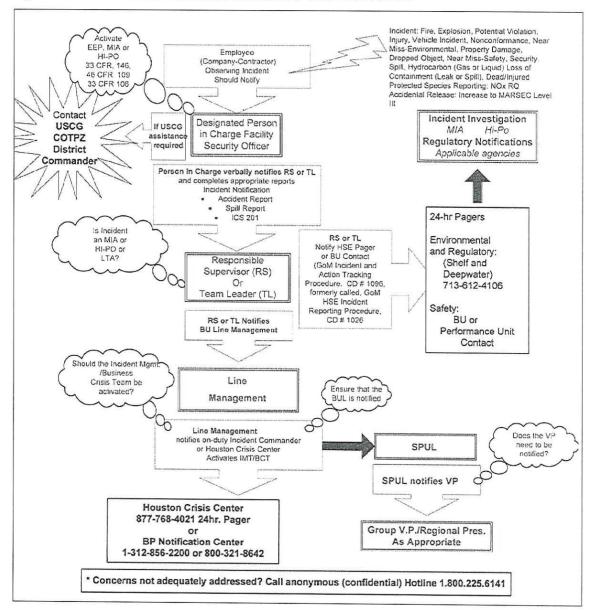
The extent of the BP control is initially the area around the well control incident and the off-scene area affected by the escaping oil and gas. In the case of H2S and/or oil spill, that distance might extend for many miles. In these circumstances, where third parties may be affected (vessels, MODU/Site/Facilitys, beach), they must be notified immediately and a separate on-scene response will be initiated.

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Figure 7-5 GoM Incident Notification Procedure for Well Flow Release



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7.4.6 Down-man, Disconnect, Evacuation or Abandon Rig by Escape Capsules

In most loss of well control scenarios during well construction on a floating MODU/Site/Facility the sequence of events will dictate the immediate actions on the rig. If the decision is made to disconnect or abandon the rig, follow the guidelines as outlined in the MODU/Site/Facility SPECIFIC EVACUATION PROCEDURES. This section is a reference guide only. The OIM (As Applicable) in consultation with the WSL must judge the proper course of action based on their experience and the circumstances of the well control incident.

Decisions to down-man non-essential personnel and attempt mitigation actions will be made by the OIM (As Applicable) in consultation with the WSL and the IC. Safety of personnel and third parties must be the number one priority. The MODU/Site/Facility OIM has final authority.

If there is any uncertainty of the potential risk of sudden escalation, then the MODU/Site/Facility should be down-manned, abandoned or disconnected (MODU) and specialists mobilized.

If abandonment is chosen the general rule of thumb for method of offshore evacuation is the following, in order of preference; 1) by helicopter if safe and practical, 2) by basket to standby or supply vessel, 3) in escape capsules (life boats).

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Have the escalation/safety risks been defined and evaluated? Have clear objectives been defined and evaluated? Before starting work: define objectives assign crew specific tasks, define safety plan, define escape plan, assign a scribe to monitor and record events.
Has the crew been trained and are they willing to perform the proposed tasks?
Does the crew have the appropriate safety equipment?
Does the attending vessel have a cascade air system to allow breathing time for evacuation by crane?
Can the life boat engines operate in an explosive air/fuel mixture in the case of broach around the MODU/Site/Facility?
Many casualties on past loss of well control incidents have been the WSL, toolpusher and driller/floormen caused by sudden ignition in attempts to mitigate the uncontrolled well flow.

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7.4.7 Initial On-Scene Command Area

The extent of the OSC control is initially the area around the well control event and the off-scene area affected by the potential for and / or escaping oil and gas. In the case of H_2S and / or massive pollution (oil or produced water) that distance might extend for several miles. In circumstances where third parties may be affected, civil authorities need to be mobilized quickly and a command and communication interface implemented with these authorities.

7.4.8 Establish On-Scene Tactical Command Post and Response Team

An on-scene Tactical Command Post (TCP) is to be established by the WSL who will assume role as leader of the TRT as soon as practical to facilitate coordination of further response activities. If the rig has been partially evacuated, the TCP might be the MODU. If the rig has been abandoned the TCP might be established nearby, outside the Exclusion Zone (the anchor handling/supply vessel may be a good choice) or nearby Site/Facility. Good communication equipment is essential between OSC and all field support resources. OSC will choose essential personnel to form a Site Response Team based on the situation.

Define Plan of Action

- Identify and prioritize Assign available resources Identify additional resources required, demob those not required.
- Delegate Actions to Team Members Fire Team Leader, Medic, Tool Pusher.

Communicate

Update IC and brief him on:

- General status including whether coming under control or getting worse.
- Information on personnel status, as it becomes available.
- · Any projected site down man, evacuation or disconnect.
- Be brief and keep to the point. The incident investigation can wait until later.
- Communication with IMT could be delegated by the WSL.

Re-Assess

Repeat the cycle: Assess - Plan - Delegate - Communicate - Re-assess and monitor Stress.

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7.4.9 Activate Exclusion Zone

After evacuations and the other initial command structure procedures, the OSC should address site safety for third parties and responders. The first step will be activating an Exclusion Zone for all traffic. The initial Exclusion Zone is a fixed radius around the release exit point(s). If air quality and H2S hazard parameters are uncertain assume 1-1/4 to 2 miles as a minimum initial radius. A helicopter or boat should scan the area down current from the rig looking for plume break out and oil slick as it may be many miles from the exit point by the time it reaches the sea surface.

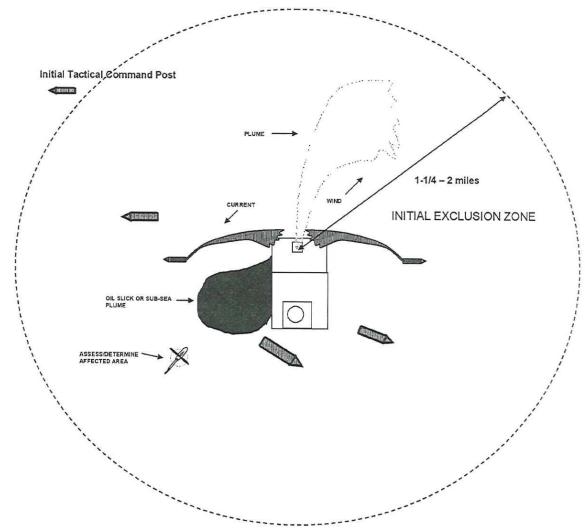


Figure 7-6 Example of Initial Exclusion Zone.

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7.4.10 Define Hot (red), Warm () Cold (green) Safe (blue) Work Zones and Shore Based Support Area

The Shore Based Support Area can be generally be pre-defined regardless of well or weather conditions. However, the definition of the work/safety zones will normally be made after all non-essential personnel and third parties have been evacuated beyond the initial exclusion zone (exception for SAR). These are safety zones designed to establish levels of increasing potential risk to responders as they move back to the rig (hot zone). The OSC should not move their fifi vessels to the MODU/Site/Facility until access and egress routes (yellow) through these zones, are established with appropriate controls and designation. Each zone will have increasing levels of safety requirements before responders are allowed to enter. The Warm Zone boundary with the Cold Zone will establish the working Exclusion Zone for third parties and non-essential personnel. These zones will be established systematically and considering the hazards with the potential to do harm at the greatest distance from the uncontrolled well flow exit points. Consider the following list as an example.

- H₂S and/or SO₂ exposure (if applicable)
- Gas ignition and explosion with flying debris
- Shifting wind directions and velocities
- Secondary explosions after primary ignition
- Broaching around or away from well site
 - Gas fire and associated heat radiation
- Effluent intensity escalating
- Liquid hydrocarbon pool fires
- Location instability and/or deterioration
- Smoke and oxygen deficiency

These zones will initially be established by the OSC in consultation with the H_2S and Safety Representatives, Sr. Service Provider Personnel, Toolpusher and Well Control Specialist Specialists (if possible) evaluating each of the potential hazards individually and again as a system. A site-specific safety plan, to include support and escape plans, must be developed for the team designated to access the zone boundaries. Weather and location conditions can change on short notice; therefore these boundaries can change and must be re-evaluated constantly. If there is uncertainty concerning the potential hazards involved then the OSC should maintain the Initial Exclusion Zone until relieved by expert response personnel.

Hot Zone (Red) Considerations

(It is recommended to wait for the arrival of well control specialists before setting this boundary)

- A "SITE SAFETY PLAN" is required before well site work can start. This plan is developed and implemented by the OSC after initial evacuation of personnel. An additional plan will be made when the well control specialists arrive.
- □ The Hot Zone (red) boundary must be realistically based on the presence (or the anticipated presence) of an explosive mixture (LEL levels), rain of liquid hydrocarbons or H₂S. It is principally controlled by wind direction but is also influenced by the leak rate and location as well as the direction of the flow.
- On burning well control incidents the Hot Zone (red) will likely be set on radiant heat limits and smoke avoidance. Wind direction also has considerable impact in Hot Zone (red) boundaries. Some fires do not burn clean and product can exist in the presence of a fire. Secondary

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		ust also be considered. The ntingency for hydrocarbon ignit		boundary should include an
	Generally the	e Hot Zone (red) will be set by is being used, be conservative	inspection and not fi	
	If the Hot Zo two men with	ne (red) boundary is set by a SCBA's shall perform the ass	essment. They also s	hould approach effluent using
	LEL meter, r	$ m H_2S$ meter, dB meter and Ra	adiant Heat Meter (if	available) and check levels
	The boundary	the well area. Initial approach s y of the Hot Zone (red) is define	should be from an upw ed as when first indica	vind direction. tion is seen of:
		level (1% concentration of hyd		
	Note: Ato	mized oil droplets in the air car	n constitute an explosi	on hazard and will not be
		by LEL meters in the Hot Zon		
		ooling or streaming of liquid hy r vapor fogs (restricted visibility		
	□ >10 ppm		, , , , , , , , , , , , , , , , , , , ,	
		pise level (hearing protection re	anirad above these le	la\
				1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970 - 1970
		v/m2 heat-loading or practically		sed skin cannot sustain
		without protection for more that		
	In measuring	parameters, approach proble	em well from any pos	sible access route (including
		downwind) and repeat this pro		
	Where possib	ole, set Hot Zone (red) bounda	aries away from these	hard indicators (ex: 1/4 LEL)
	at good contro	ol points.		
	Hot Zone (red	d) shall be restricted to well co	ontrol experts or desig	nee of the OSC and shall be
	allowed in the	e zone on a permit only basis e maintained at all times and co	and only for a prescri	ibed and defined task. Buddy
П	Mannower w	ith radios from crow safety	ond production	for each when appropriate.
_	defined Hot 7	ith radios from crew, safety	and production perso	onnel can be used at these
	Zono (rod) he	Cone (red) control points to res	trict access into the H	ot Zone (red). Downwind Hot
	zone (red) bo	bundary must be tightly contro	olled and continuously	monitored as variable winds
	can quickly c	hange the boundary. Access	routes (yellow) to the	Hot Zone should be clearly
	marked. Guid	de boats may be needed to ac	company vessels beir	ng staged in the Cold Zone to
	prevent accid			L Van Verst (1999) To the Control of
	(red) based on	ne (blue) or Cold Zone (green	i) location is based or	the "measurable" Hot Zone
		ies, available work areas and a		
_	The sale dist	ance as seen in the downwing	approach of the Hot	Zone (red) boundary is then
	Additionally	e guideline for setting sub-	sequent Zone bound	daries (Warm, Cold, Safe).
	Additionally,	software dispersion modeli	ng may be coordi	nated and used with the
	measurement	s taken to help predict downw	ind conditions if a light	ht breeze are blowing. Note:
	ivioaeis ao no	ot work well in low wind cond	<u>ditions.</u> The safe are	ea must be safe if ignition
	occurs!			
Wa	rm Zone (Yell	low) Considerations		
		ion, considerations		
	The \//em 7-	no/ \installantaile		
J	The Warm Zo		ecified and controlled	route between the Safe Zone
^		one (green) up to the Hot Zon		tors (LEL levels, H ₂ S, radiant
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	heat etc.) are	continuously monitored with	in the Warm Zone an	nd at the entrance to the Hot
	Zone (red).			
	The Warm Zonly. Vessel Service Provi Warm Zone roas before, we Zone (well ignition of the Warm Zondaries of	s or personnel dispatched/re der to work either in the yello pute unless otherwise directed and wind conditions change could also be moved or adjuster significant changes in wind one should be set to allow the Cold (green) and Safe (b	quested by the Team ow zone or red zone or guided. , the Hot Zone (red) bo sted. An example wou direction and velocity for these changes w lue) Zones and still ha	essential support personnel by Leader of the Well Control will enter via the established bundaries will shift. The Warm ld be shifting boundaries after. The initial rear boundary of ithout having to change the ove sufficient room for vessels
	engaged in su	upport to the Hot Zone (red) to	maneuver.	
Со	ld Zone (Gree	n) Considerations		
	The Cold Zor	ne (green) is considered a st plemental fire fighting equipm	aging area for storag ent and well control e	e tanks, material stock piles, equipment not currently being
	Cold zone sh and allow roo markers or es	ould be of sufficient size to a m for maneuver to the Warm scorted by guide boat as disp ce Provider unless otherwise d	or Hot zones via the \ atched/requested by	Narm Zone routes defined by
	Entry into the directed by the Well Control Cold Zone with the Cold Zo	Cold Zone (green) from the ne Forward Command Center Service Provider Team Lead ill be along routes designed	Safe Zone (blue) for in coordination with er. Movement vessel by the Forward Comm	the Well Control Manager or s from the Safe Zone to the
	As the well a Zone (green)	nflict with the Warm Zone (yell and wind conditions change, to could also be moved, but it's shifting should be contained were	the Hot Zone (red) bo s initial placement sho	ould avoid the need to move.
Sat	fe Zone (Blue)	Considerations		
	dedicated sta must made vi dispatched/red otherwise dire	quested by the Team Lead ected or guided.	Movement to the War defined by markers or er of the Well Cont	the Hot Zone (red) but is a m (yellow) or Hot Zone (red) or escorted by guide boat as rol Service Provider unless
		ue) should be accessible from		
	Safe Zone (bl	ue) restricted to essential pers	onnel with proper prot	ective equipment.
	Mark the dea	ue) is 0 LEL, <5 ppm H ₂ S, <45	ab sound level and <	1.6 Kw/m² heat loading.
	Paspansa Ma	signated Hot Zone (red) and	a Sare ∠one (blue) (on the available Emergency
П		ps for distribution and to be inc		
_	Zone (blue)	nd wind conditions change, I	tick placement should	oundaries will shift. The Safe
	boundary shift	ting should be contained withir	the Warm Zone /	avoid the need to move. Any
		g should be contained within	i ine vvaim Zone () if practicable.
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Shore Based Support Area

	The SBSA is an area for the specific purpose for reception and inspection of personnel, materiel and equipment deploying to the work zones defined above.
	May be an extension of, or inclusion within an existing shore based facility, but must be physically designated so that controlled access and security measures specific to the ongoing
	well control operations can be effective.
	Must have adequate office space and facilities, (i.e. land, power, water, hoisting, lighting, communication, IT, life support) to allow effective support operations to the well control effort
_	and optimize the offshore operational footprint.
П	May also be used for fabrication or repair of specialized equipment or devices.
	The SBSA will be a busy place, the land footprint must be sufficiently large to minimize any incidents or accidents while moving, loading or receiving equipment. The adverse impact of any accident, directly or indirectly associated with the ongoing well control operations may be magnified in the public perception arena.
	Must have a proper facility for issuing press releases, conducting press conferences, public
_	announcements and briefings as deemed appropriate by the IMT and upper management

Asset Protection and Damage Control

After the site safety issues are addressed, the OSC may address asset protection and damage control. For a semi-submersible this would likely be applicable only if the rig were abandoned due to a surface uncontrolled release caused by equipment failures (e.g., drillpipe loss of control while tripping with collars across shear rams) and where unable to disconnect and pull-off location.

Protection is probably limited to 1) firewater application prior to arrival of well control specialists, to minimize ignition hazard or to cool structure if ignition has already occurred and 2) cutting the anchor cables and letting the pre-tension pull the rig off location (if rig is moored).

The OSC must maintain control over all damage control activities, for example fifi vessels that might be deployed to spray water on the rig. The operators of this equipment must be briefed and fully understand the potential dangers of escalation and safety procedures that must be followed before they are deployed into a potentially dangerous situation. Non-essential crew should be removed and all safety equipment and breathing systems must be checked before entry into the Hot or Warm Zone.

The highest safety risk for responders exists, if the uncontrolled well flow has not ignited, from sudden and unexpected explosion and fire. There has been many uncontrolled well flows ignite during the spraying of firewater. If a high flowrate release has occurred and has not ignited, firewater application by untrained crews may be an extremely hazardous operation, and high consideration should be given to not applying firewater until specialists arrive or until ignition occurs. Most supply vessels have FIFI 1 Class equipment. These systems may not be capable of maintaining a safe distance and still apply water to the structure. In these instances, they should not approach until the well control specialists have arrived.

Although pollution control is not addressed directly by this document, booms may be used to prevent oil slicks from approaching adjacent support vessels and barges. Consideration should be given to having access to containment booms and dispersants for protection from the hazard of oil slicks during any surface control operations.

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Additionally, portable fifi equipment, if available and properly designed, can be rapidly installed on vessels of opportunity, either a multi-service vessel, large work boat or barge.

7.4.11 Define Access and Egress Routes

Routes into and out of the exclusion zones must be established for support vessels and/or helicopters carrying response personnel, initially for firefighting, assessment, and emergency escape. Generally the access and egress routes are made in the upwind hemisphere or at 90° angles to the wind and current direction. All hazards must be considered, however, before finalizing the routes as winds and currents may be in opposite directions. To avoid explosion over-pressure and subsequent flying debris attempt to approach the rig at wall corners if possible. Note: The egress route may change during the course of a work period due to changes in conditions and should be monitored continuously.

7.4.12 Initial Exclusion Zone Safety Procedures

Site-specific Exclusion Zone safety procedures will be established for all personnel entering the hot zone. The OSC in consultation with the OIM, well control specialists, H2S safety representative and IC define these procedures. If re-entry is to be considered after a rig evacuation, the OSC considers the following:

- The need for entry
 - evaluate risks for entry team
 - > develop tasks for entry team
 - > develop contingency plans and escape means for various scenarios
 - > operational "Site Safety" meeting with all concerned
- Discuss personnel safety
 - emphasis on buddy system
 - > set objectives of re-entry
 - > emphasis on escape and contingencies
 - equipment checks for hot and warm zone entry
 - > site procedures for access control/personnel monitoring
- Issue personal protective equipment (PPE) for staff in each zone
 - SCBA (if appropriate)
 - > heat/fire-resistance clothing
 - hearing and eye-protection (with heat shielding)
 - > head, hand and foot protection
 - > hand-held communications
 - air quality monitoring devices
- General site security and areas to avoid
 - > closed area
 - highly contaminated areas (gas, oil, etc.)
 - gas concentration (high LEL, H₂S, etc.)
 - on-site toxicants and chemical exposure (caustic, acids, etc.)

Site safety will be a particularly important issue if the decision is made to allow essential personnel to remain on the MODU/Site/Facility to execute mitigation procedures (pumping, firefighting, etc.), or if firefighting equipment is to be deployed in the Warm Zone to spray water after the

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MODU/Site/Facility has been abandoned. If the MODU/Site/Facility is destroyed or the perceived danger is high, the site safety issue should be left to the well control specialists and all personnel including FIFI vessels should remain outside the exclusion zone.

7.4.13 Hot (red) Zone Re-entry by Initial Response Team

When the well is blowing moderately but not on fire, there may be a desire for BP staff or MODU contractor's damage assessment team to re-board the rig. in general, we recommend that re-boarding damage assessment be left to the well control specialists and not be attempted by BP staff members or contractors. What may appear to be a manageable situation could escalate quickly and cost the lives of the assessment team. The responsibility of determining whether or not to attempt a site investigation will rest on the judgment of the onsite personnel and the IMT leader. If there is any chance that the investigation will put the assessment team at undue risk, the effort should be aborted. The case of search and rescue (SAR) may be accepted but only after a detailed safety/rescue plan is in place for the responders and risk for rescuers is reasonable. For all other purposes (e.g. assessment or mitigation or attempt to pull-off rig) the on-scene personnel should wait for a professional response team to arrive and develop a detailed proactive plan of action.

If re-boarding is attempted, it should only be done by people with experience and training in the risks involved. This should be attempted only when wind conditions permit a safe retreat from the Site/Facility and under the covering protection of water spray. These men must be trained in working under mask (wearing SCBA equipment) and be properly attired for heat protection should the well suddenly ignite. Note: Many fifi class 1 vessels do not have adjustable nozzles and full stream spray could injury response personnel.

7.4.14 Establishing Work Zones

Purpose

The purpose of designating the various work zones in well control operations is to determine the level of hazards around the wellhead and to restrict access to these areas to trained and qualified specialists.



Blue Zone (Safe Area)

Physical Parameters

- +/- 1 to 2 miles minimum distance from wellhead.
- 0 PPM H₂S
- 0% LEL
- noise level 65 dB or less

Normal Duties

- Location of Forward Command Center/Floatel
- Signing in of all well site personnel
- Staging area for support equipment and services.

Equipment Permitted

- Well Control Support equipment
- Emergency vehicles

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Personnel Restrictions

- Personnel restricted to those directly involved with well control efforts.
- Admittance requires approval of Well Control Manager or Well Control Service Provider Team Leader.
- All approved personnel must be signed in at the Forward Command Center immediately upon entering the Blue Zone.

Personal Protective Equipment Requirements

Head protection —

Hard hats

Foot protection —

Steel-toed safety boots

Eye protection —

Safety glassed / shields

Hearing protection —

> 29 dB plugs / muffs

Hand protection —

Gloves

Clothing —

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Important

All personnel on station must be accounted for at the Forward Command

Center each day.

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GREEN (Cold) ZONE

Physical **Parameters**

- +/- ½ mile minimum distance from well head.
- +/- 1/2 mile minimum in width
- 0 PPM H₂S
- 0% LEL
- 65-80 dB noise level

Normal Duties

Staging area for:

- water storage tanks
- firefighting pumps
- · well-control equipment while not in use
- · emergency/safety personnel and equipment

Equipment Permitted

- Cranes, hoists, etc. when not in use.
- Athey wagons and accessories, abrasive jet cutter, etc.

Personnel Restrictions

- Admittance requires approval of Well Control Service Provider Team
- Usually limited to well control personnel and emergency/safety personnel.

Personal protective equipment requirements

Head protection — Hard hats

Foot protection —

Steel-toed safety boots

Eye protection —

Safety glasses / shields

Hearing protection —

> 29 dB plugs / muffs

Hand protection —

Gloves

Clothing —

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YELLOW (Warm) ZONE

Physical Parameters

- +/- 200' minimum from wellhead
- +/- 1/2 mile minimum width
- Physical layout includes controlled route(s) and entry points from other work zones into the Warm Zone and Hot zone. – Route width minimum ¼ mile.
- 0-10 PPM H₂S
- 0-25% LEL
- 80-90 dB noise level (or less)

Normal Duties

- Fireboat and Barge Monitors
- · Final staging area for all well-control equipment
- · Cranes, Capping Support Vessels etc.

Personnel Restrictions

- Admittance requires approval of Well Control Service Provider Team
 Leader
- Usually limited to well-control support personnel, emergency/safety personnel, and Well Control Service Provider Specialists.

Personal protective equipment requirements

Head protection —

Hard hats

Foot protection —

Steel-toed safety boots

Eye protection —

Safety glasses / shields

Hearing protection —

> 29 dB plugs / muffs

Hand protection —

Gloves

Clothing —

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Safety equipment —

H₂S air mask, etc. (when conditions exist)

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RED ZONE (Hot)

Physical Parameters

- 200' minimum radius around wellhead or entire facility as appropriate
- 10 PPM or greater H₂S
- 25% or greater LEL
- 90 dB or greater noise level

Normal Duties

- · Clearing debris from wellhead area
- Capping operations

Equipment Permitted

- Specialized well-control equipment
- · Cranes and operators

Personnel Restrictions

- Highly restricted area; admittance requires approval of Well Control Service Provider Team Leader
- Usually limited to Well Control Service Provider Senior Well Control Specialists, Team Leader and Well Control Project Manager or designate

Personal Protective Equipment Requirements Head protection—

Hard hats

Foot protection—

Steel-toed safety boots

Hearing protection—

> 29 dB plugs / muffs

Hand protection-

gloves

Clothing-

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Important

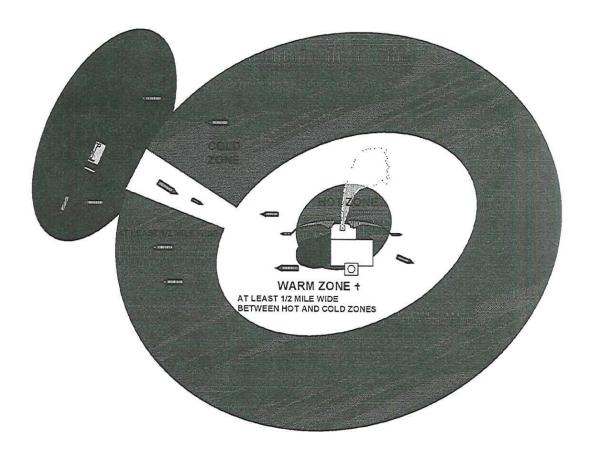
- No search and rescue operations can be conducted in the Hot Zone (red) without the direct supervision of the Well Control Service Provider Team Leader
- No remedial work can be performed in the Hot Zone (red) without the direct supervision of the Well Control Service Provider Well Control Team Leader.
- Two-man buddy system to be in use at all times when working within the Hot Zone (red) boundaries.
- When work/operations are being conducted in the Hot Zone (red), the firefighting pumps will be kept running.
- Boundaries of the Hot Zone (red) may shift during the course of the well-control operations due to wind conditions or well conditions, or as determined by the Well Control Service Provider Team Leader.
- Well Control Service Provider Team Leader will be immediately available and providing direct supervision to all personnel working within the Hot Zone (red).
- Access to the Hot Zone (red) will be monitored and closely controlled at all times.

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Figure 7-7: Example of Established Work Zones



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7.4.15 Phase 1, Loss of Well Control Response Actions

The initial OSC should not attempt Level 3 well control actions unless approved by the Incident Commander and only then after a credible operation plan has been devised along with a site safety and egress plan. In cases where the event occurred rapidly with no chance for off-site support, the location should be secured and abandoned. Well control response would wait for the Level 3 rampup and a proactive plan to be developed by the Source Control Team. Circumstances in which field personnel might attempt control actions would be where an escalation has occurred gradually from a Level 2 Incident, the location has been down-manned and the support team has already been activated. Control attempts may be considered where an immediate control attempt has a high probability of success, the safety risk is low, further rapid escalation risk is low and an approved site safety plan is in place.

7.4.16 Removing MODU by Re-Boarding

There may be a situation where the MODU contractor feels he might save his rig if it can be removed safely. This should not be attempted until the risks have been evaluated and accepted, the probability of success is high, further rapid escalation risk is low and an approved site safety plan is in place. In general, it is recommended to wait until the well control specialists have arrived to assist in this decision process.

WARNING! In no case shall the response team be subjected to unreasonable risk. At all times during the initial Phase 1 period the safety of personnel will be the number one priority. Crews should not be expected or asked to perform potentially dangerous tasks that they have not been trained to perform. Crew injuries and fatalities have occurred in the past while attempting well control response actions from untrained personnel.

Level 3 - Phase 1 on-site well control response actions will be specific to company approved policy and:

- The circumstances of the loss of well control (e.g. surface, on fire, underground, potential risk for escalation);
- 2. The operation at the time of the incident (e.g. drilling/completion related or testing related);
- 3. Potential for sabotaging future proactive control plans if an immediate attempt fails; and,
- 4. The local environment at the time of the incident (e.g. night/day, weather, fire, pollution, available resources, willingness, training level and skill of crew).

There may be a situation where contractors feel he/she might save some of his asset if it can be removed safely. This might entail re-entry into the Hot Zone (red) with a crew to prepare equipment components for removal. This should not be attempted until the risks have been evaluated and accepted, the probability of success is high, further rapid escalation risk is low; an approved site safety plan is in place and with the approval of the OSC. In general it is recommended to wait until the well control specialists have arrived to assist in this decision process.

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7.4.17 Voluntary Ignition Guidelines

Ignition Criteria Oil - "Sweet" Gas

It is unlikely that voluntary ignition would be considered in the case of an uncontrolled surface release of oil where a floating MODU/Site/Facility is still in place over the well. This would then leave attempting to in-situ burn the oil on the sea as it surfaces with the gas plume. Boomed oil will burn more readily. The potential of catastrophic pollution/environmental consequences for free release (unburned) of hydrocarbon gasses is generally considered low unless in certain low wind or other atmospheric conditions escalate the likelihood of a catastrophic event. The main driver for voluntary ignition of oil and "sweet" gas is primarily for pollution mitigation rather than imminent risk to life and property. Therefore, it is more likely than not that these actions may be turned over to the Oil Spill Team for execution. See Figure 7-7. However, the OSC (MODU OIM (As Appropriate)) or his designate can make a decision to ignite the well without consultation if it is in their judgment that voluntary ignition is the safest course of action to mitigate an imminent threat.

Ignition Criteria Sour Gas (H2S)

If conditions are apparent that an uncontrolled release of hydrogen sulfide (H₂S) to the atmosphere might pose an **imminent** danger to the health and safety of the public or well site personnel, the OSC (MODU OIM (As Appropriate)) or his designate can make a decision to ignite the well without consultation if it is in their judgment that voluntary ignition is the safest course of action. If there is no immediate danger to the public, the Wells Completions Superintendent, Wells Team Leader and the Wells Ops manager shall be consulted prior to ignition.

The well **should** be ignited as soon as all personnel working at the site have cleared to a safe distance under any of the following conditions:

- The well is experiencing an uncontrolled flow, the well effluent has reached the surface, no immediate chance of control and the flow, if not ignited could lead to loss of life.
- 2. The well is flowing H₂S gas to surface and the safety of personnel cannot be assured because:
 - Evacuation of personnel within the emergency planning response zone CANNOT be accomplished; or
 - ii. Monitoring results indicate H₂S levels of 15 ppm for fifteen (15) minutes in unevaluated areas; or
 - iii. Monitoring is not taking place due to unforeseen circumstances, such as weather or communication breakdown.
- 3. Once ignited, monitor SO2 levels and conduct downwind monitoring to define effective exclusion zones.
 - Advise Leadership of the change in emissions
 - Initiate downwind monitoring for SO2 as well as H2S
 - Assess the need for additional firefighting equipment

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The rescue team will be positioned on a radio-equipped vessel at a safe upwind distance from the gas/oil release. They will maintain radio and visual contact with the primary ignition team and provide rescue support if necessary. ☐ The primary ignition team will carry a lower explosive limit (LEL) meter and will continuously monitor the area for explosive gases to determine a safe perimeter. They will approach the oil/gas release to a distance determined by the range of the flare gun or at a gas reading of 10% of the LEL, whichever comes first. The OSC will carry the flare gun (flare shells are to be carried in a separate container). ☐ The OSC will determine the hazardous area and establish safe perimeters. He will decide if it is safe to attempt ignition. If there is not a reasonable wind velocity the overpressure from the ignition may endanger the primary ignition team (even if there is wind, an explosion from gas trapped inside of an enclosed space is a possibility). Make sure the vessel is not in a hydrocarbon slick. ☐ If the flow is not ignited on the first attempt, move in 20 to 30 feet parallel to the release and fire again. If trouble is incurred in igniting the gas, attempt to fire a flare at 40 to 90 degrees to each side of the area where you have been firing (it is not uncommon to fire 8 or 10 flares and not get ignition). If ignition is not accomplished move back to the safe zone and evaluate other options.

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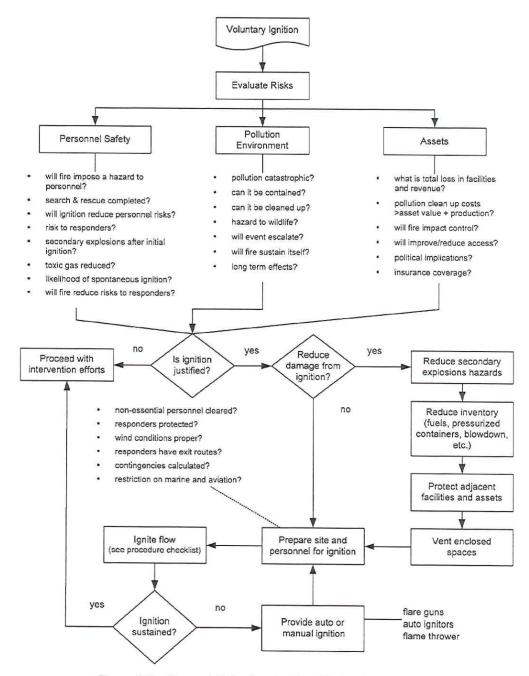


Figure 7-8: General Voluntary Ignition Evaluation Flowchart

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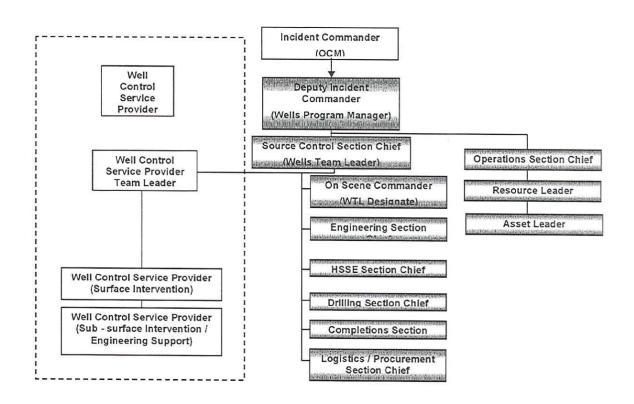


Figure 7-9: Example Level 3 – Joint Well Control Response Source Control Team – Initial Response

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8 Individual Roles and Responsibilities

8.1 Introduction

Responsibilities of personnel in responding to Level 1, 2 and 3 (Phases 1-5) can be found in the following subsections. Personnel may have overlapping duties in all levels or phases if required. In addition, it may be necessary to change the duties of personnel in response to changing conditions or a shortage of manpower.

8.2 WSL Roles and Responsibilities



8.2.1 LEVEL 1: ROUTINE WELL CONTROL

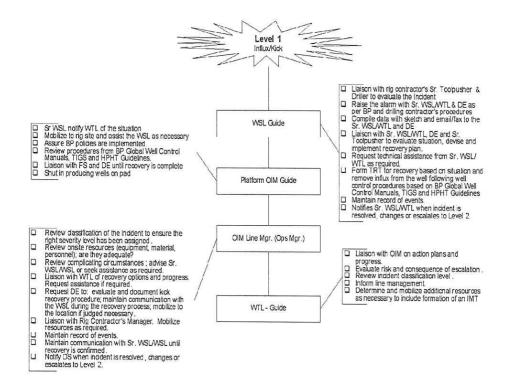
Ensure driller has secured the well and raise the alarm as per BP and Drilling Contractor's SOP (BP Global Well Control Manuals).
Assign rig drilling engineer to collect all other data required to complete Kick Control Worksheet as per BP policy. Compile data with sketch and email/fax to the WTL.
Consult with OIM (As Applicable) and rig crew to evaluate situation, devise and implement recovery plan. Discuss any potential complications (e.g., H2S, float and motor in drillstring for accurate SIDPP, impending severe weather, mud supply, pump problems, choke problems, hydrates, location of drillpipe valves, possibility of stuck pipe, close to MAASP, losses, simultaneous operations, etc.). Agree on response level with OIM. Request technical assistance from WTL as required.
H2S Determination. If H2S is designated the incident classified will be upgraded to Level 2 It must be assumed that the influx contains H S if any of the following apply:
☐ H2S is noted as a possibility on the Drilling Program.
☐ If traces of H2S are observed in the mud log analysis.
☐ The influx has come from a formation not normally associated with Hydrocarbon Production.
WSL or designate will notify line manager/TL of the incident in the following order: □ Sr. WSL (As Applicable),
☐ Engineer assigned to well, or duty engineer if after office hours,
□ Wells Team Leader.
☐ Sr. WSL #2/Superintendent Designate (As Applicable)
Consult with Engineer for specific well control procedures based on STPs
Assist OIM to form TRT based on the circumstances. WSL logically assumes role of Source
Control Branch Director.
Maintain record of events.
Notify Sr. WS L/ WTL when incident is resolved, changes or escalates to Level 2.

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☐ Follow IMS procedures and protocol until recovery is complete. Refer to Figure 8-1

Figure 8-1: Level 1 Response - Influx/Kick



8.2.2 LEVEL 2: No SOP, Non-routine Well Control Event

- Secure the well as practical and raise the alarm as per Spar ERP.
- Inform WTL your location and plans to assess the situation
- Consult with the OIM (As Applicable)/Toolpusher and Size Up the Situation
 - ☐ Get debrief from the Toolpusher and rig crew
 - □ What happened
 - ☐ Is the situation stable or changing
 - Assess immediate escalation probability
 - □ Assess the immediate, hot zone safety issues
 - □ Is it safe to keep the crew at their stations (if not or unknown, evacuate rig crew from hot zone until a credible action plan can be devised).
 - □ Assess the crew willingness to continue to work under potentially or unknown hazardous

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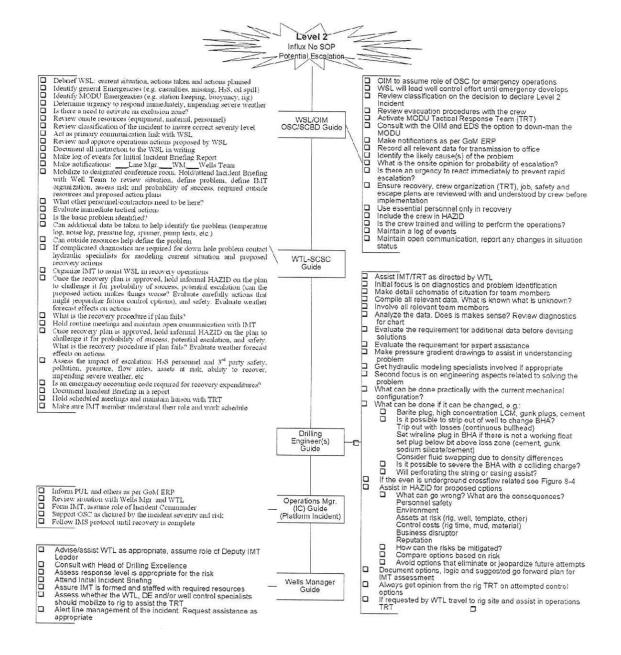
			circumstances.
			dentify the hot zones (e.g., rig floor, derrick, shakers, moon pool, pump room, etc.)
			Assess immediate escalation safety hazards and possible consequences
			Excessive pressure, gas release, H2S, fire, explosion, projectiles, gas plume, etc.
			tablish rig crew emergency escalation procedure
			☐ Establish hot zone abandonment criteria and procedure
			☐ Establish escape route(s)
			☐ Establish if additional protective actions are required (e.g., PPE, barriers, temporary refuge, standby deluge, etc.)
_	۸ -		plate, clearly mark, and secure the immediate hot zone area(s)
			immediate IAP by the rig crew
		reco	
		ls im leak	mediate action required to mitigate escalation (e.g., pumping junk shot to plug a hydrocarbon, shearing drillpipe, etc.)
		Wha logs	t can be accomplished to gain better understanding about the problem (run ROV, diagnostic, pump-in tests, etc.)
		Devi	se initial IAP for crew
			s the crew trained and willing to carry out the IAP
	Im		ent hot zone command and control
		Re-a	assign non-essential personnel outside the area
		Esta	blish a personnel accountability system in the hot zone.
		Esta	blish communication procedure
	Repo	rt to t	he TCP and debrief the OIM and TRT leaders. Discuss complications or escalation and
C			P. Agree on response level with OIM.
	□ N d	lotify one,	WTL as per ERP/IMS plan and discuss situation, what has happened, what is currently being what is planned and assistance requested.
E	□ V	VSL I	ogically assumes role of Source Control Branch Director unless relieved by IMT.
		W	hen time permits record all relevant source control data for transmission to office,
			Written description of incident including times.
		L	Status of personnel, environment, well, surface assets, third parties, weather.
			Sketch of well mechanical situation.
			Drilling/well parameters, mud properties, pressures, volumes, mud log, MWD data, etc.
			Status of mud and chemical supplies and requirements based on situation.
			Additional equipment and material requirements for response or contingency.
			Any other data that can assist the IMT in defining the problem and recovery options.
			Prepare written IAP for current period
		Re	e-evaluate initial incident assessment and IAP
		Ε	In consultation with OIM (As Applicable) and WTL develop tactical operational procedure for recovery to include safety and escape procedures in the event of escalation.
			Ensure recovery, crew organization (TRT), job safety, and escape plans are reviewed with and understood by crew before implementation. Include the crew in HAZID. Use essential personnel only in recovery.
			Is the crew trained and willing to perform the proposed recovery operations?
			entinually monitor for changes that may affect current actions plans
			aintain log of events
		Fo	llow IMS procedures and protocol until recovery is complete.
	R	efer	to Figure 8-2

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Figure 8-2 Level 2 Incident Response Guide



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8.2.3 LEVEL 3: Loss of Well Control

- Confirm with MODU OIM (As Applicable) that he is in command with respect to the MODU and personnel while on board and in escape capsules.
 - Follow MODU/Facility/Site specific ERP for evacuation or disconnect. Some personnel may be in shock, it is important for OSC to demonstrate command and control to restore order.
 - Assume roles as Emergency Response Coordinator. Initial responsibility will be to coordinate offsite response and support.
- Assist OIM to respond to immediate personnel and third party safety: All personnel accounted for at the muster stations.
 - Notify standby boat to move upwind ready to pickup evacuees or provide fifi support.
 - SAR: Will the SAR team be put at unreasonable risk to perform search and rescue? Personnel may be scattered depending on conditions. Do not put SAR team at risk until certain there is someone to rescue and a safety and rescue plan is in place.
 - Immediate Medical Support Needs Mobilize Medivac,
 - Assist OSC to evaluate whether to disconnect and pull/drive off or evacuate. If evacuation is chosen, assist OSC to evaluate best means for evacuation (typically order of priority depending on well effluent type/severity, point of source release and weather conditions - helicopter, boat transfer by basket, escape capsules)
 - □ If supply vessel is moored to MODU, have them disconnect and move up wind, ready to pickup evacuees or provide life support as required.
 - Assist OSC to evaluate MODU options.
 - Confirm OIM has made notifications when practical: __onsite and en-route standby and supply vessel(s) and helicopters; __broadcast on emergency marine frequency; __MODU manager
 - □ __Duty Emergency Manager __WTL as per GoM emergency notification procedure
 - Record: Name, Date, Time, contact method, who is in command.
 - Description of current situation.
 - Request immediate onsite assistance as required (medivac, helicopters, fifi vessels, oil spill, H2S safety, Coast Guard, operation team, etc.).
 - Planned immediate response actions: (Disconnect, evacuation, SAR, firefighting, setup new command post, secure exclusion zone, etc.)
 - Any third party vessels immediately threatened by surface or sub-sea uncontrolled release?
- Assist OIM in assessing Down-manning, Disconnect or Evacuation
 - Stay Connected: If safe and practical (for example seabed uncontrolled flow) it is normally preferred to leave the rig connected to the wellhead (if there is a competent drillstring in the well that can be pumped through) and down man to essential only personnel and attempt to regain control or wait for specialists to arrive. This setup will typically offer

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- more options for regaining control from the surface than leaving sheared drillpipe in the well.
- Uncontrolled flow at the seabed in deepwater are not likely to create gas plumes that would form boils under the rig due to the water depth and resulting pressure and temperature which will cause the escaping gas to form hydrates and go into solution in the seawater. The hydrates have a density of approximately 0.95 sg which will cause them to rise slowly due to its density difference. The ocean current should carry and scatter the hydrates a considerable distance from the seabed escape point before they melt and turn back to gas between 300m and 500m water depth depending on water temperature and salinity.
- If drilling 26" hole riser less and an uncontrolled shallow gas flows occurs to seabed, it is unlikely pumping down the drill string will kill the well. Continuing to pump seawater may help the well bridge but will result in loss of the BHA. The decision to attempt to pull the string out of well will be based on safety rather than economics issues.
- If pipe was sheared due to an uncontrolled flow from the drillpipe and was hung off in lower pipe rams and the drillpipe pressure is greater than the holding pressure of the rams from the backside there is good probability that the pipe rams will leak. If this occurs the flow may ultimately cut out the ram body escalating to an uncontrolled well release at the seabed. Under this scenario, if the drillpipe cannot be bullheaded dead before the rams start to leak, consideration should be given to opening the lower pipe rams and dropping the drillpipe containing the uncontrolled flow underground. The consequence of this action however is a relief well or SBOP intervention may be required for recovery.
- Disconnect: In an unlikely situation where an intense gas boils forms under the rig and there is little or no wind to disperse the gas to below LEL levels then a prudent course of action would be to shear the pipe, disconnect and move to a safe location generally 90 degrees to the wind direction. The drillpipe should never be retrieved from the open wellbore before disconnect as it may be required as the only relief well target if that became necessary.
- Evacuation: Evacuation would likely be initiated if a MODU/equipment failure occurred during the loss of well control making it impossible to disconnect or drive-off or if a significant fire and explosion occurred.
- Additionally, abandonment procedures should include securing hatches and watertight doors if possible to prevent possible flooding during the firefighting operations.
- After MODU evacuation or emergency disconnect, set-up Command Post in Safe Area (e.g., standby or supply vessel or on MODU if disconnected) and initiate necessary immediate actions.
 - Activate/enforce initial third party exclusion zone (1 to 2 mi radius from MODU) and/or uncontrolled release point (if broached away from MODU or if MODU is disconnected).
 This to include oil slick, potential ignition LEL and H2S hazards (2 miles if H2S identified).
 - Define access and egress routes and safety procedures for vessels re-entering the hot zone.
 - □ Evaluate voluntary ignition of the well/effluent if pollution is massive or H2S threatens third parties.

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□ Evaluate immediate asset protection options (e.g., spraying water) if the MODU was

It is not recommended for the standby/supply boat to attempt immediate asset protection with shipboard firefighting monitors until a safety and action plan has been established, particularly if the well has not ignited (If not on fire it may ignite unexpectedly endangering crew from explosive debris or H2S, even if it is on fire there may be secondary explosions, or it may go out) or if there is a gas plume on the sea. The gas may automatically shut down the vessel engines.
If the well/MODU is on fire and a safety and action plan is devised then the vessels may apply firewater to protect the MODU. It may not be advisable to extinguish the fire
Evaluate immediate control options - if well is blowing to surface, control attempts prior to arrival of specialists is not recommended. Control attempts must be approved by IC.
Maintain log of events. Assign responsible person to begin documentation of events and compile onsite data for the IMT. Interview personnel who witnessed the events.
Maintain open communication as practical with IC.
Continuously monitor and manage the stress and potential panic levels in i) himself; ii) others in Emergency Team(s); Hi) personnel at muster.

- Evacuate non-essential personnel as soon as practical.
 Continuously review the situation, holding regular Time-outs' to structure the 'Management of the Emergency':
 - Receive Incoming information and updates from team members.
 - □ Assess Changes and developments on Threats and Action Plan. Plan Decide appropriate actions.
 - Delegate Actions to team members.
 - Communicate with Emergency Coordinator.
- ☐ If conflicting orders are received always use the following guide:

Safeguard life.

Protect the environment.

Protect the company/third party assets.

Maintain the company image and reputation.

abandoned; direct vessel firefighting response -

Turn over On-scene Command to Source Control Team for solution when relieved. Figure
8-3 WSL Initial Response Guide for a Stand Alone MODU Loss of Well Control.

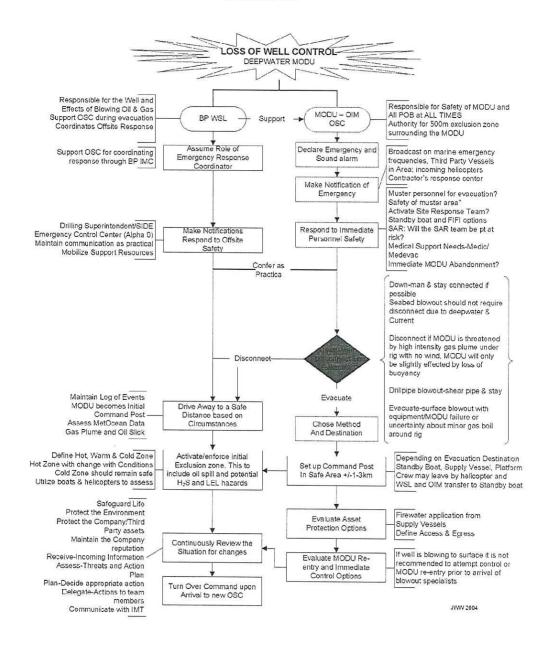
Brief	Well	Control	First	Responde

Implement	GoM -	Incident I	Votification	reference	Figure 7.5

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Figure 8-3 WSL Initial Response Guide for Loss of Well Control



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8.3 MODU/Site/Facility OIM Roles and Responsibilities Guide

6	
6	

8.3.1 LEVEL 1: ROUTINE WELL CONTROL

	Make	notific	cation	s as per MODU/Site/Fac	cility ERP and BP IMS.	
				ent with the support of th	Man and the business state between	
	□ E ^x	valuate	e esca el, en	alation potential and con vironment, asset, contro	sequences for the MOI	
[□ A:	ssess	respo	nse level (1 or 2) based	on the MODU/Site/Fac	cility risk assessment.
[gation procedures if esca		,
			mine			ons should be stopped or
		- -		if non-essential FOR sha	ould be down manned	until recovery is complete.
				ume OSC role with the \		ntrol Branch Director
	Follo	w IMS	proce	edures and protocol until	recovery is complete	
0	8.	3.2 L	.EVEI	L 2: No SOP, Non-rou	tine Well Control Eve	ent
	Make	notific	ation	s as per MODU/Site/Fac	cility ERP and BP IMS.	
				ss the incident with the s	The state of the second state of the second	
		/aluate nvironn	incic nent,	lent potential and conse	quences for the MODU ness/schedule disruption	J/Site/Facility for, personnel, ons, and reputation damage.
		Ass	ess re	esponse level based on	the MODU/Site/Facility	risk assessment.
	□ Ev			gation procedures if esca		
		Det dela	ermin ayed.	e if any current or plann	ed simultaneous opera	ations should be stopped or
		Det	ermin	e if non-essential POB s	hould be down manne	d until recovery is complete,
	Assu			e with the WSL as the S		
		Hold	Initia	I Incident Briefing with T	RT	
		Instit	ute th	e following using IMS pr	otocol	
			Site Co	ontrol and Management		
				rm TRT based on situati	on	
			\Box	Manage span of contro	I for personnel and res	ources
				Assure key responders		
				Mobilize specialists as		
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	Ma	ainta	ain a TCP and information center
	Iso	olate	e the incident hot zones (separate people from the hazards)
	Ini	tiate	e personnel protection actions
	Ma	ainta	ain a staging area, manage efficient use of resources
	Si	ze u	p situation, assess strategic and tactical objectives
		Str	rategic
			Define the problem(s) not just the observable symptoms
			Perform diagnostics to assess possible scenarios
			Use software tools to simulate scenarios to establish boundary
			conditions and to determine equipment and resource requirements
			Plan.solutions to milestones where additional information may be gained
			Strategic Plan must solve the problem not just mitigate the symptoms
			Constantly assess for change, the hazards and the potential effects
			Hold daily strategy meeting with TRT
			Prepare daily Situation Status reports
		Та	actical
			Break work into manageable tasks
			Work toward milestones
			Assure all safety aspects are considers
			Hold pre and post shift tactical meetings
_			Approve all IAP
Site			
			a Site Safety Officer reporting to the OSC
M	ODU	J/Sit	ongoing site characterization with respect to hazards and risk (hot zones, te/Facility, access to and from)
			afety procedures during control and recovery
			lefining hazard control zones (e.g., hot, warm, cold)
			HAZID and HAZOP meetings to include simultaneous operations
			lequate escape and accountability procedures implemented for all IAPs
			ly essential personnel are used to implement IAPs the hot zone
			un-necessary IAPs inside the hot zone
			sential personnel are properly trained to implement IAP
			sential personnel have proper PPE when entering the hot zone
			lequate evacuations contingencies are implemented
			nication
			nd network which links the OSC with the Operations Section Chief
			network which links the OSC with TRT
	supp gistic		network which links Staging Area Manager with supply unit in IMT

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- ☐ A source control network which links the Source Control Section Chief with the Source Control Branch Director (used for communications relating to the technical aspects of source control operations)
- □ Follow IMS procedures and protocol until recovery is complete
- ☐ Maintain open communication with FS and WSL until recovery is completed.



8.3.3 LEVEL 3: Loss of Well Control

□ Follow MODU Specific ERP depending on situation

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8.4 Sr. WSL Roles and Responsibilities

	8.4.1	LEVEL 1: ROUTINE WELL CONTROL
□ □ Re	Close in here app Assure	BP policies are implemented. Review STP well control procedures. with WTL or Superintendent Designate and Engineer until response is complete.
	8.4.2	LEVEL 2: No SOP, Non-routine Well Control Event
	Initial Ph	none Call
		WSL: current situation, actions taken and actions planned. Provide immediate and support.
	Review assigne	classification of the incident with WTL to insure correct severity level has been d.
	Act as	primary communication link with WSL until advised otherwise by WTL.
	Review	and approve operations actions proposed by WSL.
	Make l	og of events for Initial Incident Briefing.
		otifications: WTL;Eng.
		to well site. Meet with WSL and staff for incident briefing.
		with WSL and confirm with WTL objectives for next 12 hours.
		personnel to compile incident data, with diagrams as necessary, into a report for ion to other Task Force Members. Supply sufficient technical details for tics.
		onsite resources (equipment, material, personnel); are they adequate? Support ditional resources as required.
	Suppor	t WSL as required.
	Maintair	open communication with WTL and WSL until recovery is completed.



8.4.3 LEVEL 3: Loss of Well Control

Proceed immediately to well site as directed. Confer with WTL and staff for incident briefing enroute as needed.

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	ар	Assist OSC in Surface Control tasks and act as deputy OSC upon arrival on-scene (as oplicable). Assume role as Source Control Branch Director or as assigned by WTL.						
	ma	Gather data about the site, bathymetry rig, well, wellheads, trees, BOPs, etc., and relevant ups for a one mile radius around the well. Assist well control specialist upon arrival:						
_		Determine immediate 24 hour tactical objectives						
		Hold Incident Briefing with specialists, OSC and TRT						
		Define command and communication structure with Well Control Team Leader						
		Define safety and rescue procedures, safety equipment and Medevac requirements						
	STA	Review hot (red) / warm () / cold (green) / safe (blue) zone/ designation and access and egress routes						
		Define staging area, fabrication area, and construction requirements						
		Define firewater requirements for FIFI in support of capping operations.						
		Define immediate personnel requirements, <u>e.g.: well control specialists, laborers, welders</u> and fitters, equipment operators.						
		Define Source Control Groups and leaders based on function (e.g., fabrication, firewater supply, labor, safety, firefighters, etc.)						
		Define off - site housing, office and catering requirements						
		Define immediate equipment requirements, <u>e.g.: FIFI system (fire pumps, pipe racks, hose and monitors, foam)</u> , <u>Athey wagons, crane for capping, cranes for unloading and moving equipment.</u> large forklift, fabrication equipment (angle iron. 10"+ pipe for fire water manifold. casing for venturi tube, corrugated steel for head shields), slings, cables, light plants, generators, etc.						
		Implement tactical objective for next 24 hour work period. Determine what work will be carried out at night and timing of meetings (SC shift briefings, TRT meetings and strategy meetings) General Job Responsibilities:						
		The Sr. WSL will serve as Source Control Branch Director (appointed by WTL), and is responsible for supervising at-the-scene source control operations (As Applicable).						
		Assist Sr. WSL #2/Superintendent Designate (OSC) in sizing up situation and in developing solutions to address source control related problems. Receive assignments from OSC.						
		Ensure health and safety of all at-the-scene source control personnel.						
		Brief personnel assigned to carry out well kill (source control) related tasks and ensure that assigned personnel have information and equipment they need to carry out tasks safely and effectively.						
		Account for all assigned personnel and equipment. Maintain proper span-of-control,						
		Establish a direct line of communications with WTL (Source Control Section Chief) and keep him informed about nature and status of source control operations.						
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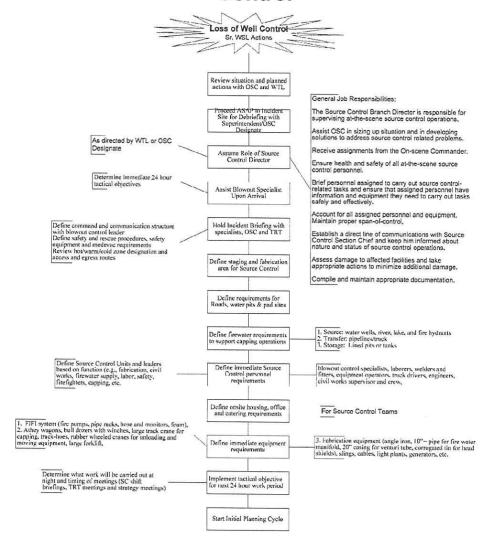
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- Assess damage to affected facilities and take appropriate actions to minimize additional damage.
- Compile and maintain appropriate documentation.

Figure 8-4 Sr. WSL Response Guide Loss of Well Control.

Figure 8-4 Sr. WSL Response Guide Loss of Well Control



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8.5 Sr. WSL #2/Superintendent Designate - Checklist

8.5.1 LEVEL 1: ROUTINE WELL CONTROL
 □ On order (WTL), be prepared to support/assist WSL or Sr. WSL #1 as directed by WTL. □ Be prepared to act as a Superintendent Designate as appointed by the WTL or DIC □ Review classification of the incident with WTL to ensure the right severity level has been
assigned with respect source control complications. Review onsite source control resources (equipment, material, personnel) as directed by the WTL; are they adequate?
Review complicating circumstances with WTL; advise WSL as directed.
☐ If directed by WTL, work with DE to evaluate and document kick recovery procedure; maintain communication with the WSL during the recovery process; mobilize to the location if judged necessary by WTL.
Be prepared to liaison with OIM or Rig Contractor's Manager (MODU) during recovery. If directed by WTL, mobilize resources as required.
□ Follow IMS procedures and protocol until recovery is complete.
Refer to Figure 8-5
8.5.2 LEVEL 2: No SOP, Non-routine Well Control Event
□ Initial Phone Call from WTL
 Be prepared to debrief WSL or Sr. WSL as applicable: current situation, actions taken and actions planned. Provide immediate advice and support.
How long will mud and chemical supplies last under current circumstances?
 Review onsite resources (equipment, material, personnel). Are they adequate? Support with additional resources as required.
 Review classification with the WTL of the incident to insure correct severity level was assigned.
 Be prepared to act as primary communication link with WSL on behalf of the WTL.
 Review operations actions proposed by WSL with the WTL.
 Document all instructions issued to the WSL in writing following IMS protocol.
☐ Make log of events for Initial Incident Briefing Report.

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□ Mobilize to designated conference room. Attend Incident Briefing with Asset and Wells Team

Review situation with WTL; be advised of <u>Incident Briefing</u> time and location.

□ Assist WTL to notify Source Control Team of Incident Briefing time and location.

☐ Make notifications as per ERP procedures

☐ Make Notifications as directed by the WTL; __ Other Support Staff

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and pr	lew situation, define problem, help define IMT Source Control organization, assess risk robability of success, required outside resources and proposed action plans. Eview the current situation with the WTL and Source Control Team.
sp	hat other personnel/contractors need to be here? Rig manager, mud/cement ecialists, cementing contractor representative, geologists/petrophysics, reservoir, well ntrol and hydraulic modeling specialists, logging specialist, stake holders, others.
	sist WTL with evaluation of immediate tactical actions; e.g. mobilize support personnel uipment, materials. Review all IAP with WTL
□ Siz	Define the problem(s) not just the observable symptoms Is the basic problem identified? Yes - Can the existing team implement the recovery with available resources? No - Organize alternate TRT which can implement the solution No - Can additional data be taken to help identify the problem (diagnostic logs -temperature, noise, log, nuclear, spinner, pump tests, sonar, ROV, seismic etc). Use specialist resources help define the problem (e.g., reservoir/production engineers, geologists, geophysics, well control or hydraulic specialists, equipment engineers, service company specialists, partner specialists, etc). Perform diagnostics to assess possible scenarios If complicated diagnostics are required for downhole problem contact hydraulic specialists for modeling current situation and proposed recovery actions. Use software tools to simulate scenarios to establish boundary conditions and to determine equipment and resource requirements
□ As op the	Assist in preparation of General Strategic Source Control Plan Does the Strategic Plan solve the problem not just mitigate the symptoms Plan solutions to milestones where additional information may be gained. The well control problem may be changing or may be uncertain with several scenarios requiring different actions to control after each milestone is reached Participate in formal HAZID on the General Plan to challenge it for probability of success, Potential for Escalation (can the proposed action makes things worse? Avoid actions that might jeopardize future control options if they fail Do you have backup plan if the primary plan fails Attend daily strategy meetings as directed by WTL, or as required, with IMT. Modify Strategic Plan as required Constantly assess for change in situation or improved understanding of the problem, the hazards and the potential effects on strategy sist in organization of IMT as directed by WTL to assist WSL in control and recovery erations based on situation and recovery plan. The DWP Wells Manager will choose a Source Control Section Chief. An engineering team may be required for diagnostics of planning unconventional control options.
Atter	nd routine meetings as directed by WTL and maintain open communication until
recover	ry complete.

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8.5.3 LEVEL 3: Loss of Well Control

	If a MODU	J/Site/Facility loss of well contr RP and IMS GoM Guideline	ol incident occurs, foll	ow MODU/Site/Facility
		U - Initial Call - Review situation	n with BP – WSL and	WTL (follow GoM IMS
	all aspect Name, Descrip Loss of H2: Person Emerg If MOD	e any General Emergencies? If its of the response. Record e.g. date/time, method of contact, potion of current situation (only for well control scenario and design of S, plume). In a status, i.e. casualties, mission of disconnect or evacuation of U is to be abandoned, by what striction on approaching MODU	, and who is in commar facts not speculation). cription (pollution, gas sing. t method (helicopter, b	cloud, ignition,
	Determin spill, H2S	ne immediate onsite assistance safety, Coast Guard, Navy, op	e as required (medivac peration team, etc.)	, helicopters, fifi vessels, oil
	Any third If so, have identified?	parties, vessels or personnel per they been notified? Has a gas?	potentially threatened s plume been identifie	by the uncontrolled release? d? Has an oil slick been
	command	the planned immediate respond post, secure exclusion zone, e o control or mitigation action w	etc)?	
		he best method of communication		457.17
		WSL as directed by WTL.		
	As direct actions pruntil direc	ed by WTL, be prepared to act oposed by initial WSL/OSC alorted otherwise.	ong with the WTL with	respect to source control
	As approp 9-2.	riate make Notifications as per	BP GoM Incident Ma	nagement Plan, see Figure
	Review sit	tuation with Line Manager, WT	L and WM.	
		otification of potential Source (S
		ole in Source Control Team as		
	Review sit	tuation and planned actions wit	th Initial OSC then WI	Ĺ:
	Mobilize	to site and take over as OSC (or duties as directed b	y WTL)
	Coordina	te with civil authorities		
	Mobilize	well control specialists and per	sonnel from BP Houst	ton to assist as required.
		fications as per the GoM DWP		
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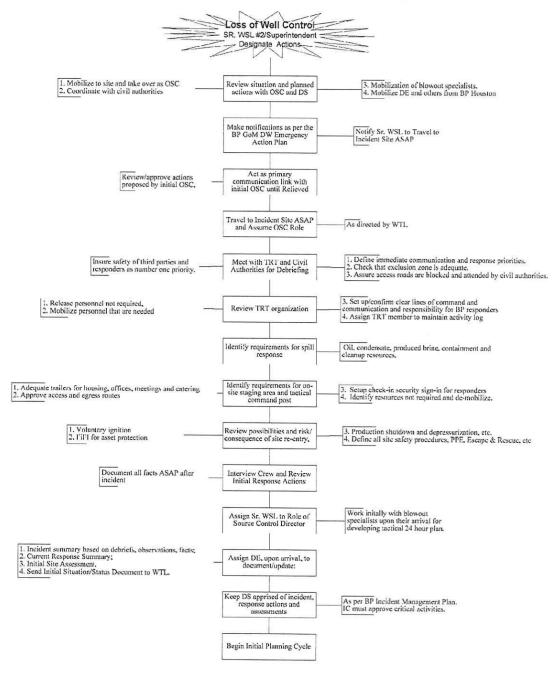
		Meet with WSL. Sr. WSL #1 and Sr. contractor personnel for a debriefing. Review response actions taken.
		As directed by the WTL or DIC, assume command after debrief. Inform TRT that you are in command.
		Review procedures as per BP Incident Command System Plan for the GoM DWP field.
		Meet with civil authorities and define immediate communication and response priorities.
		Review TRT organization. Release personnel not required, mobilize personnel that are needed.
		Insure safety of third parties and responders as number one priority.
		Check that exclusion zone is adequate. Coordinate with Coast Guard to ensure there will be no deliberate or accidental entry of exclusion zone by unauthorized persons/vessels.
		Set up/confirm clear lines of command and communication and responsibility for BP responders.
		Assign on-scene support staff member to maintain minute-by-minute log of all incident activities.
		Review possibilities and risk/consequence of site re-entry, voluntary ignition, asset protection, production shutdown and depressurization, etc.
		Identify requirements for spill response <u>(oil/condensate/produced brine)</u> , containment and cleanup resources.
		Identify staging area and tactical command post on-site, setup check-in security sign-in for responders.
		Identify resources not required and de-mobilize.
		Assign Sr. WSL to work with well control specialists upon their arrival for developing tactical 24 hour plan.
		Assign resources to document/update: o Incident summary based on debriefs, observations, facts; o Current Response Summary; o Initial Site Assessment. Send Initial Situation/Status Document to WTL.
		Keep WTL apprised of incident, response actions and assessments as per BP Incident Management Plan. IC must approve critical activities.
		Begin Initial Planning Cycle.
Control.	Re	efer to Figure 8-5 Sr. WSL #2/ Superintendent Designate Response Guide – Loss of Well

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Figure 8-5 Sr. WSL #2/ Superintendent Designate Response Guide Loss of Well Control



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8.6 Wells Team Leader Roles and Responsibilities

	8.6.1 LEVEL 1: ROUTINE WELL CONTROL
	WTL will raise the alarm in the well engineering group. WTL will form an Incident Management Team (IMT) organization required for recovery and if support personnel should be mobilized to site.
	WTL will, upon evaluation of situation, take on role of IMT Leader or assign that role to FS. In the absence of WTL, IMT Leader would be Wells Ops Manager or designee of the WTL.
	WTL will notify relevant line management if the Incident is due to loss of Primary Well Control.
	Liaison with FS on action plans and progress.
	Evaluate risk and consequence of escalation.
	Review incident classification level.
	Inform line management.
	Determine and mobilize additional resources as necessary including formation of IMT. fer to Figure 8-6
110	ici to i iguic o-o
	8.6.2 LEVEL 2: No SOP, Non-routine Well Control Event
	WTL will inform Wells Program Leader of a Level 2 well control incident.
	WTL will assume the role of IMT Leader. He will form IMT based on the incident situation
	for recovery. WTL may mobilize to well site and assume OSC role or support WSL / FS as directed by
_	Wells Ops Manager or designate.
	Review situation with FS.
	☐ Are there any General Emergencies?
	☐ Is the exclusion zone secured?
	☐ Have adjacent production facilities or 3rd party work sites been notified.
	☐ Do civil authorities need to be notified?
	□ Determine urgency to respond immediately. Is there time to plan a response with the support of an IMT?
	Make Notifications: Line manager; GoM DWP Wells Team,Well Control Specialists
	Mobilize to designated conference room. Hold / attend Incident Briefing with Wells Team to

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review situation, define IMT organization, define problem, assess risk and probability of

success, required outside resources and proposed action plans.

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on situation planning u site to sup	e IMT to assist WSL and OSC in and recovery plan. An engine nconventional control options. A port the WSL (e.g., WTL and / ort, service contractor, and servi	eering team may be red An operations team ma <u>r Sr. Engineer)</u> , also lo	quired for diagnostics and y need to mobilize to the well gistics support, HSE support,
	t assistance from well control sp	16 15 15	
	plicated diagnostics required fo		3
	for modeling current situation a		
probability	sponse plan is approved, hold in of success, Potential for Escala Evaluate weather forecast effec	ation, and safety. Wha	
assets at r	the impact of escalation: H ₂ S, p isk, shut-in of adjacent production severe weather, etc.		
□ Provide impact.	support resources from drilling	completions group as	required based on potential
	itional accommodations required	d?	
	rith area OCM (if affected) on po shutdown non-essential operatio		
	nergency accounting code requi		
☐ Hold so	heduled meetings and maintain	liaison with TRT until re	ecovery complete.
Refer to Figure	8-6.		
8.6.3	LEVEL 3: Phase 1 – Initial Re	esponse	
☐ Upon re	ceiving call from FS review situa	ation:	
	e any General Emergencies?		
	vil authorities been mobilized?		
	egulatory agencies identified on of current situation?	Emergency Contact Li	st been contacted and
☐ Are all	affected 3rd parties evacuated or	r notified?	
	exclusion zone identified and sec		
	voluntary ignition be performed		
	of initial TRT organization.		
	on of Tactical Command Post (T	CP)	
	ed initial support from BP Houst		
	ation of Well Control Service Pro		
	situation with Wells Ops Manag	7/4/	
Command		er (vvr m viii assame i	ole as Depaty Moldent
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	Define WTL role in the Incident Management Team (IMT) - WTL would logically be Source strol Section Chief (SCSC).
0	Define immediate objectives for Source Control and location of WPM (GoM DWP/Houston). Notify GoM DWP Wells Team, well control engineers, service company representatives. Check-in to Incident Command Post and receive instructions. Assume role of Source introl Section Chief or as directed by the DIC.
	communicate with Operations Team Leader and confirm that Emergency Well Control ponse Teams have been contacted and advised of Level 3 status.
V	Mobilize to designate conference room. Hold Incident Briefing with GoM DWP Wells Team:
	Brief team on what is currently known about the situation.
n	Review notifications and attendees. Who else needs to be informed or be in future neetings? Partners, service companies, petroleum engineering, geophysics, production, dSE, other.
	Define Functional Organization and Incident Action Plans for next 24 hours, for example:
	Assign Engineer # 1 to mobilize to site and assist the Sr. WSL (Source Control Branch Director), make Initial Site Assessment and assist with surface capping operations.
	Assign Engineer # 2 to begin strategic planning for kill operation after capping. Work with hydraulic engineers, mud, pumping and snubbing contractors (cap/bullhead or cap/divert/snub kill).
	Assign Engineer # 3 to begin strategic planning for a relief well. What rigs are available for relief well? Begin evaluation for relief well surface location. Work with well control intervention specialists on procedures for intersection and kill.
	Assign Technical Support Engineer to gather onsite and archived data about the loss of well control incident. Compile data in format that can be easily accessed by IMT and TRT, both paper and electronic (post on server or website). Setup and maintain information center.
	Evaluate mobilizing technical resources required outside of GoM DWP Wells Team both within and outside BP (petroleum engineering, geology and geophysics, well control engineering specialists, service company specialists). Mobilize as required. If warranted, Business Support Team (BST) will be activated.
	Define communication procedures to the site, between team members and third parties.
	Define work schedule and meeting schedule.
S	etup an emergency accounting code required for emergency expenditures.
	tart Initial Planning Cycle.
N acci	lobilize to well location to handle direct supervision of well control operations or designate
assi	gnee.



8.6.4 LEVEL 3: Phase 2 – Surface Intervention

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		Supervis	se and manage surface intervention operations at the well site / office.
		Maintair	constant communications with Well Control Service Provider Team Leader directly
	or	through	delegate.
		Commu	nicate with WPM daily as to current status of well and ongoing well control
	op	perations.	
		Review	insurance coverage for well.
		Review	Master Service Agreements in effect with servicing contractors.
		Make de	ecisions as to well control operations.
4		Ì	
		8.6.5	LEVEL 3: Phase 3 –Sub-Surface Intervention
			se and manage well control operations at the well site / office.
			constant communications with Well Control Service Provider Team Leader directly
	or		delegate.
			nicate with WPM daily as to current status of well and ongoing well control
_	ok	perations.	
			ecisions as to well control operations.
			III meetings.
			that Contingency Plan is being followed.
			answers and solutions to any questions that arise.
			communications with management as to the status of the well.
		Assume	responsibility for control of total project.
4		8.6.6	LEVEL 3: Phase 4 – Well Recovery
		0.0.0	LLVLL 3. Filase 4 - Well Recovery
		Attend a	Il meetings.
		Confirm	that Contingency Plan is being followed.
		Provide	answers and solutions to any questions that arise.
		Maintain	communications with management as to the status of the well.
		Assume	responsibility for control of total project.
		Supervis	se and manage well control operations at the well site / office.
		Maintain	constant communications with Well Control Service Provider Team Leader directly
	or	through	
			nicate with WPM daily as to current status of well and ongoing well control
	op	perations.	
		Make de	cisions as to well control operations.
		8.6.7	LEVEL 3: Phase 5 – Post-Incident Evaluation

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	Review al Leader.	Post Incident Reports with W	PM and IC and Well C	control Service Provider Team			
	Review all Post Incident Reports with Operations Team Leader and all Team Leaders of the Emergency Well Control Response Teams.						
	Advise ma	anagement of final findings.					
	8.6.8 L	LEVEL 3: WTL (Source Contr Responsibilities	rol Section Chief, WT	L) General			
esp NTL	onsible for o will provide	Source Control Section Charganizing and managing all I the Logistics Section Chief or ial, and supply needs. WTL (S	MT activities related Supply Unit Leader w	to source control operations. with information on personnel,			
	Discuss in Level 3 statu	ncident with WPM and agree th s of Contingency Plan for Eme	nat current well conditional control R	ons warrant activation of Response.			
	size up the	e incident, identify source cont ce control section into manage	rol section problems a				
		port from BP Field Representa		ent well conditions.			
		gular (at least daily), comprehe hen conditions change	ensive updates to We	lls Ops Manager (DIC),			
		and manage well control oper					
	appropriate source control section personnel and maintain proper span-of-control						
	terporter and acting and grant and the training acting and the training acting and the training acting and the training acting a						
	assist the Deputy Incident Commander in preparation of strategic objectives and response priorities						
	BCS3						
	serve as primary IMT contact person for the Sr. WSL (Source Control Branch Director (SCBD)) on all tactical matters relating to source control operations						
		e Planning Section Chief or Sit		th up-to-date information on			
		tatus of source control operation					
	represent Source Control Section at all formal IMS meetings and brief the WPM (DIC) and members of command and general staff on nature and status of work being done by Source Control Section						
	assist Plar	nning Section Chief or small te of objectives and field assignment	am preparing incident	action plans (IAPs) in			
		nning Section Chief or small te		nlan in proporation of			
	general plan	and occurred the or sitial te	am preparing general	plan in preparation of			
		preparation of plans for relief v	well drilling salvage a	nd lightering operations as			
	relevant	Tananca Angeleganga, atayo, atana Proposition and a substantian and a substantial an					
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	ensure personnel involved in source control operations have the personnel, equipment, material, and supplies needed to carry out those operations in a safe, effective, and efficient manner						
	ensure that personnel are aware of and follow company policies and appropriate government agency directives						
	keep Sr. WSL (Source Control Branch Director) informed of changing weather conditions provide regular briefings on nature and status of source control operations coordinate source control operations with Operations Section Chief						
		at appropriate documentation is Section Chief or Documentatio		(SCBD) and forwarded to			
	consider t	he need for an alternate or bac nd maintain appropriate docum	ckup person for extend	ded (24-hour) coverage and			
	8.6.9 L	.EVEL 3: WTL (SCSC) Gener	al Checklist (from Bl	P-IMS)			
Get	Organized						
	Check in t WPM (DIC).	o Incident Command Post (ICF	P); report to WPM (DIC	C); receive briefings from			
	Assume re	esponsibility for tasks delegate	d by WPM (DIC)				
		Source Control Section person	7. 10	nization chart for Source			
		nd define work that must be do s; break work down into manag		Control Section problems			
		responsibilities for tasks to be		Control Coation november			
		direct line of communications v		(6)			
		a communications protocol wit tain Information Center	n Sr. VVSL (Source Co	introl Branch Director)			
	undated orga	lanning Section Chief or Resou anization chart for Source Conf	arce Unit Leader with i	nitial and, as necessary,			
				on their transportation in the			
J		d reports to provide Planning S					
	and, as necessary, updated incident facts related to description of source and source control operations						
	5 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -						
5.70		ssary, updated information for					
		d reports to provide Planning S					
	and, as nece	ssary, updated information on	"available" resources	by staging area, "assigned"			
		task and location, and "out-of-					
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Conduct Initial Incident Briefing Meeting

Bef	re	Meeting:
		Review ICS 201 Initial Incident Briefing Document Meet with Planning Section Chief or Situation and Resource Unit Leaders to update uation map and status boards in Information Center
		Meet with Deputy Incident Commander to review:
		Timing, location, and objectives of meeting
		Information to provide during report
		Identify Source Control Section problems and solutions to be raised during meeting
Dun		Prepare meeting report Meeting:
	pe	Present report; focus on overall strategy of source control operations, tasks being rformed to implement strategy, progress being made, problems being encountered, and lp needed from IMT
		Pay attention to reports made by other meeting attendees; ask questions, as appropriate
		Assume responsibility for action items delegated by Incident Commander
Afte		eeting:
	Dir	Brief other Source Control Section personnel in ICP and Sr. WSL (Source Control Branch rector) on items discussed during meeting; assign Action Items, as appropriate
		Address assumed Action Items
Ana		e Incident Potential
		If requested, assist Planning Section Chief in preparation of Incident Potential Worksheet If requested, participate in meeting with Incident Commander to review worksheet
Esta		sh Strategic Objectives
	sol	Receive information on problems being addressed by source control personnel and lutions being implemented to address problems from Sr. WSL (Source Control Branch rector)
	ор	Ensure WPM (DIC) is comfortable with TRT strategy as it relates to source control erations
	ad	Size up incident and source control personnel's response to incident to identify any ditional problems not currently being addressed by source control personnel
		Identify solutions to additional problems
		Prepare solution-based strategic objectives
		Provide objectives to Planning Section Chief

Conduct Periodic Assessment Meetings

Before Meetings:

☐ Work through Operations Section Chief to receive updated Field Reports from Sr. WSL (Source Control Branch Director) 30 to 45 minutes before meetings

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	Meet with Planning Section Chief or Situation and Resource Unit Leaders to update situation map and status boards in Information Center
	Meet with Deputy Incident Commander to review:
	☐ Timing, location, and objectives of meetings
	☐ Information to be provided during reports
	Identify Source Control Section problems and solutions to be raised during meetings Prepare meeting reports
Dur	ing Meetings:
	Present reports; focus on nature and status of work related to strategic objectives, tasks delegated by WPM (DIC), and Source Control Section-specific tasks
	Pay attention to reports made by other meeting attendees; ask questions, as appropriate Assume responsibility for Action Items delegated by WPM (DIC)
Afte	er Meetings:
	Brief other Source Control Section personnel in ICP and Sr. WSL (Source Control Branch Director) on items discussed during meetings; assign Action Items, as appropriate
☐ Pre	Address assumed Action Items pare Incident Action Plans
Def	ine Objectives for Next Operating Period (NOP)
	If requested by WPM (DIC), designate representative to assist Planning Section Chief or small team preparing IAP
	Provide Source Control Branch Director information on duration of NOP Obtain from Source Control Branch Director a projection on:
	☐ Tasks currently underway that will continue into NOP, and progress that will be made on these tasks through to completion of current operational period (COP)
	□ New tasks that will be initiated before end of COP and continue into NOP
	□ New tasks that should be initiated during NOP
	Provide Planning Section Chief or small team preparing IAP information obtained from Source Control Branch Director
	Be available to answer questions from Planning Section Chief or small team preparing IAP
Prep	pare Field Assignments for NOP
	Obtain list of tasks Planning Section Chief or small team preparing IAP believes will continue into NOP; provide Planning Section Chief or small team preparing IAP feedback on list and guidance on any new tasks that should begin during NOP to fully address objectives
	Review list of tasks with Sr. WSL (Source Control Branch Director) to gain Branch Director's concurrence; provide Planning Section Chief or small team preparing IAP feedback from Sr. WSL (SCBD)
	Be available to answer questions and provide information to Planning Section Chief or small team preparing IAP
Pen	form Logistics, Safety, and Environmental Reviews

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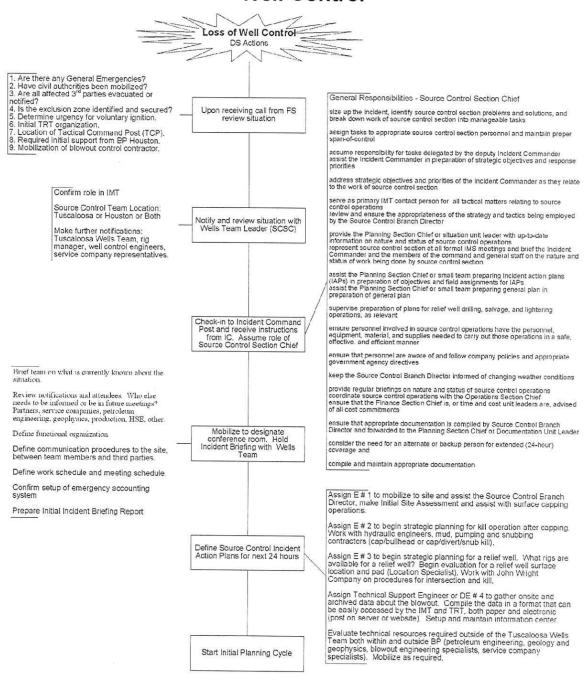


	Be available to answer questions and provide information to Safety Officer, Environmental
	Unit Leader, and Logistics Section
	Use field assignments for NOP to develop organizational assignments for tactical response operations; coordinate with Sr. WSL (SCBD)
	Provide Planning Section Chief or Resource Unit Leader with Source Control Section Organizational Assignments for NOP, including those for source control tasks
Ass	semble, Approve, and Implement IAP
	Assume responsibility for distribution of relevant portions of approved IAP for NOP to Sr. WSL (SCBD); brief Sr. WSL (SCBD) on plan contents
	Supervise implementation of approved IAP by Source Control Section personnel
IMT	Operations for NOP
	Identify IMT-level Source Control Section task that will continue into, or start during, NOP
	For each IMT-level task, define what Task Leader will be asked to achieve during NOP
	Prepare verbal or written handover report for incoming Source Control Section personnel
	Supervise handover activities
Pre	pare General Plan
Def	ine Objectives
	Work with Planning Section Chief or small team preparing general plan to identify critical tasks and milestones for completion of Source Control Section tasks
	Work with Planning Section Chief or small team preparing general plan to identify Source Control Section-directed tasks to be covered by general plan
Pen	form Detailed Assessment
	Provide Planning Section Chief or small team preparing general plan information on response techniques that will be utilized to carry out source control operations
	Provide Planning Section Chief or small team preparing general plan guidance on kind and
	quantity of resources needed to complete Source Control Section-directed tasks within milestone time frame
Арр	rove and Implement Plan
	Review Source Control Section tasks covered by general plan; provide Planning Section Chief or small team preparing general plan comments on plan
Refe	er to Figure 8-6 Wells Team Leader Response Guide - Loss of Well Control.

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Figure 8-6 Wells Team Leader Response Guide - Loss of Well Control



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8.7 PU Well ControlTA - Checklist

	8.7.1	LEVEL 1: ROUTINE WELL CONTROL
ass F WT F I pro-	Review igned w Review L; are t Review f directs cedure;	MS procedures and protocol until recovery is complete.
	8.7.2	LEVEL 2: No SOP, Non-routine Well Control Event
O NO	Review Review assign of the office of the of	one Call from WTL w onsite resources (equipment, material, personnel). Are they adequate? Support additional resources as required. w classification with the WTL of the incident to insure correct severity level was seed. gment Well Control TA ther notifications as directed by the WTL; Other Support Staff situation with WTL; be advised of Incident Briefing time and location.
to and	review : d proba Reviev	o designated conference room. Attend Incident Briefing with Asset and Wells Team situation, define problem, help define IMT Source Control organization, assess risk bility of success, required outside resources and proposed action plans. We the current situation with the WTL and Source Control Team.
	specia contro	other personnel/contractors need to be here? Rig manager, mud/cement lists, cementing contractor representative, geologists/petrophysics, reservoir, well I and hydraulic modeling specialists, logging specialist, stake holders, others.
	equipn	WTL with evaluation of immediate tactical actions; e.g. mobilize support personnel, nent, materials. view all IAP with WTL
	Size u	p situation, assess strategic objectives

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☐ Yes - Can the existing team implement the recovery with available resources?

□ Define the problem(s) not just the observable symptoms

□ Is the basic problem identified?

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				□ Yes - document IAP and proceed with control and recovery operations □ No - Organize alternate TRT which can implement the solution No - Can additional data be taken to help identify the problem (diagnostic logs -temperature, noise, log, nuclear, spinner, pump tests, sonar, ROV, seismic etc).
				☐ Use specialist resources help define the problem (e.g., reservoir/production engineers, geologists, geophysics, well control or hydraulic specialists, equipment engineers, service company specialists, partner specialists, etc).
				 Perform diagnostics to assess possible scenarios If complicated diagnostics are required for downhole problem contact hydraulic specialists for modeling current situation and proposed recovery actions.
	_	۸۰	-:-4	Use software tools to simulate scenarios to establish boundary conditions and to determine equipment and resource requirements
				in preparation of General Strategic Source Control Plan
			DIS	es the Strategic Plan solve the problem not just mitigate the symptoms in solutions to milestones where additional information may be gained. The
			we	Il control problem may be changing or may be uncertain with several
			SCE	enarios requiring different actions to control after each milestone is reached
			Pa	rticipate in formal HAZID on the General Plan to challenge it for probability of
				Avoid actions that might jeopardize future control options if they fail
		П	Δ ++.	Do you have backup plan if the primary plan fails end daily strategy meetings as directed by WTL, or as required, with IMT.
			Mo	dify Strategic Plan as required
				Constantly assess for change in situation or improved understanding of
				the problem, the hazards and the potential effects on strategy
	As	sist	in o	rganization of IMT as directed by WTL to assist WSL in control and recovery
	the	erat So	urce	based on situation and recovery plan. The DWP Wells Manager will choose Control Section Chief. An engineering team may be required for diagnostics
	an	d pla	anni	ng unconventional control options.
				S procedures and protocol until recovery is complete
P	\tte	nd ro	outir	ne meetings as directed by WTL and maintain open communication until
				lete.

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8.7.3 LEVEL 3: Loss of Well Control

		J/Site/Facility loss of well contr RP and IMS GoM Guideline	ol incident occurs, foll	ow MODU/Site/Facility
		J - Initial Call - Review situatio	n with BP – WSL and	WTL (follow GoM IMS
		ment Well Control TA of Leve	13.	
	Are there all aspects Name, Descrip Loss of	any General Emergencies? If s of the response. Record e.g. date/time, method of contact, otion of current situation (only f well control scenario and des S, plume).	there are general em, and who is in commar acts not speculation).	nd.
	Person	nel status, i.e. casualties, miss		
	If MOD	ency disconnect or evacuation U is to be abandoned, by wha striction on approaching MODU	t method (helicopter, b	poats, escape capsules)? ?
		e immediate onsite assistance safety, Coast Guard, Navy, op		, helicopters, fifi vessels, oil
		parties, vessels or personnel e they been notified? Has a ga		
	command	the planned immediate responsors, secure exclusion zone, to control or mitigation action w	etc)?	
		ne best method of communica		
	As directe	ed by WTL, be prepared to rev VTL with respect to source con	riew actions proposed	by initial WSL/OSC along
		riate make Notifications as per		
	Review sit	uation with Segment Well Cor	trol TA, WTL and WM	
		otification of potential Source		
		ole in Source Control Team as		
		uation and planned actions wi	Commence of the Commence of th	L:
	Mobilize	well control specialists and per	sonnel from BP Hous	ton to assist as required.
		fications as per the GoM DWP		
	If directed command	d by the WTL or DIC, assume	command after debrie	f. Inform TRT that you are in
	Review p	rocedures as per BP Incident	Command System Pla	n for the GoM DWP field.
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Meet with civil authorities and define immediate communication and response priorities.
Review TRT organization.
Insure safety of third parties and responders as number one priority.
Check that exclusion zone is adequate. Coordinate with Coast Guard to ensure there will be no deliberate or accidental entry of exclusion zone by unauthorized persons/vessels.
Review possibilities and risk/consequence of site re-entry, voluntary ignition, asset protection, production shutdown and depressurization, etc.
Identify requirements for spill response (oil/condensate/produced brine), containment and cleanup resources.
Identify resources not required and de-mobilize.
Be prepared to work with well control specialists to assist in developing tactical 24 hour plan.
Verify resources to document/update:
 Incident summary based on debriefs, observations, facts;
 Current Response Summary;
 Initial Site Assessment. Send Initial Situation/Status Document to WTL.
Keep Segment Well Control TA apprised of incident, response actions and assessments as per BP Incident Management Plan. IC must approve critical activities.
Provide technical support to the WTL/SCSC in the Initial Planning Cycle.

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8.8 Segment Well Control TA

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	8.8.1 LEVEL 1: Routine Well Control
	Routine situational awareness within standard drilling report distribution or periodic updates.
	8.8.2 LEVEL 2: No SOP, Non-routine Well Control Event
	Notification of Level 2 incident by SPU Well Control TA or WTL as appropriate.
	Situational awareness within standard drilling report distribution and periodic updates (i.e. ery 4 hours or significant events) as needed. Be available for consultation or update as cessary.
	Review action plans with WTL and SPU WC TA as appropriate.
	Review Level 3 Contingency Plans.
	8.8.3 LEVEL 3: Phase 1 – Initial Response
o ro	After notification of Level 3 incident by DIC, WTL or SPU WC TA, move to conference from for initial incident briefing.

Consult with DIC and WTL on Initial Tactical Response Plan. Advise DIC and WTL on role of SPU WC SPA.



8.8.4 LEVEL 3: Phase 2 - Surface Intervention

	Attend a	all meetings
_	Attend	all illeetiligs

- Serve as a key technical authority on establishing strategic well control objectives.
- Provide technical assistance and consultation with DIC and SCBC/WTL.
- Provide answers and solutions to any questions that arise.
- Maintain communications with management as to the status of the well.
- Assist Incident Commander and DIC as needed.



8.8.5 LEVEL 3: Phase 3 - Sub-Surface Intervention

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Serve as a key technic objectives.	al authority on establishing strategic sub-surface intervention	
Review budgeting and	ons and justifications for sub-surface intervention. acquisition requirements for relief well(s) as appropriate. ent as to the status and resource requirements for sub-surface	
8.8.6 LEVEL 3: Ph	ase 4 – Well Recovery Operations	
Consult with managem	under control and return to normal operations are appropriate. ent as to the status of the well. ring lessons learned for post incident evaluation phase.	
8.8.7 LEVEL 3: Ph	ase 5 – Post Incident Evaluation	
Review the findings of	n Well Control Service Provider. internal lessons learned investigations and studies. ns with management as to the status of the well and post incidened.	nt

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8.9 Engineer #1 (Primary TRT Engineering Support)

□ □ □ □ Refer	Liaison wi Evaluate Review in Assist/rev	th TRT on action plans and prisk and consequence of escacident classification level. iew kick circulation/removal can WTL until recovery is complete.	rogress. lation. alculations and recover	ry procedures.
	8.9.2 I	_EVEL 2: No SOP, Non-rou	tine Well Control Eve	ent
	Assist Sou Initial focu Evaluate in Assist IMT Make detail Compile a Involve all Analyze the Does it Review Evaluate the Evaluate the Evaluate the Make presidentification Second foo What can What can What can Is it pool Is it pool Will pelf the even	make sense? diagnostics chart. he requirement for additional data he requirement for expert assista sure gradient drawings in Excel t ulic modeling specialists involved	cted. dentification. lation. lation. members. y, reservoir, geophysics, a before devising solution nce before devising solution o assist in understanding if there is a significant un ated to solving the proble nt mechanical configurat on can be changed, e.g.: k plugs, cement. BHA? bullhead). is not a working float. ne (cement, gunk, sodium lensity differences. ding charge explosive? in solving the problem? d see Figure 8-4.	ns. g problem. nknowns in problem m. ion?
	2 event).	, ,		Tomo word initiated from a Level
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What can go wrong? How bad can it be? What are the consequences?

Personnel safety

Environment

Assets at risk (MODU/Spar, rig, well(s), template, other)

Control costs (rig time, materials, extra resources, production shut-in, etc.)

Business and schedule disruption

Reputation damage

How can the risks be mitigated?

Compare options based on risk.

Avoid options that eliminate or jeopardize future control attempts.

Document options, logic and suggested go forward plan for IMT assessment.

Always get buy-in from the rig TRT on attempted control options.

- ☐ If requested by Source Control Section Chief, travel to rig site and assist in operations TRT
- Liaise with WTL until recovery is complete.

Refer to Figure 8-7.



8.9.3 LEVEL 3: Phase 2 Surface Intervention

ш	Proceed immediately to the designated Conference room. Meet with WTL, SCSC and staff
	for incident briefing.
	Support Source Control Branch Director in tactical preparation for capping operations.
	□ Assist Source Control Branch Director as directed. For example:
	□ Document initial site assessment for the IMT

- ☐ Assist in developing General Surface Intervention Strategy.
- ☐ Develop an Incident Action Plan (IAP) to reach the first critical milestone where additional information may be gained.
- □ Evaluate and define possible scenarios at the critical milestone. What affect will the possible scenarios have on proceeding to the next milestone? What additional resources will be needed for each?
- □ Evaluate and define possible event escalation while working toward the first milestone. What affect will the possible escalation have on proceeding to the next milestone? What additional resources will be needed if it does?
- □ Develop a basic hazard plan for each IAP (both for safety and jeopardizing control operations if failure occurs). What effect could surface control failure have on the relief well? (e.g., removing a pipe target from the well).
- □ Develop IAP alternatives for the next milestone assuming various possible scenarios after the first critical milestone is reached.
- ☐ Work with DE # 2 on the preparation for kill operation as necessary.
- ☐ Make daily report for Source Control Branch.

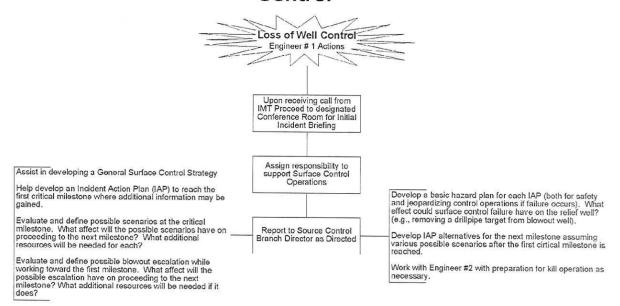
Refer to Figure 8-7.

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Figure 8-7 Engineer #1 Response Guideline – Loss of Well Control



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8.10 Engineer #2 (Kill Team)

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8.10.1 LEVEL 1: Routine Well Control

Routine situational awareness within standard drilling report distribution or periodic updates.
8.10.2 LEVEL 2: No SOP, Non-routine Well Control Event
Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
Review Level 3 Contingency Plans.
8.10.3 LEVEL 3: Phase 2 Surface Intervention – Kill Operations
Proceed immediately to designate Conference room. Meet with WTL and Team for incident briefing.
Primary responsibility will be for assisting specialist in developing kill strategy for surface capping.
Gather archived well data required for diagnostics, well flow and kill modeling, coordinate with reservoir engineers, geologists, geophysics as necessary.
Work with hydraulic modeling specialist and kill equipment engineer upon arrival to define well control scenario possibilities.
Develop kill plans based on most likely scenario with backups as practical. Evaluate relief well kill scenarios.
Work with mud and pumping contractor to develop kill plant based on plan
Evaluate options after well is hydraulic killed: plug and abandon or recover.
Design P&A if that option is chosen.
Move to well site when kill plans are defined and assist specialist in installation and testing of mud and kill plants.
Assist well control engineering specialist in kill operation.
Supervise P&A operation or recovery.

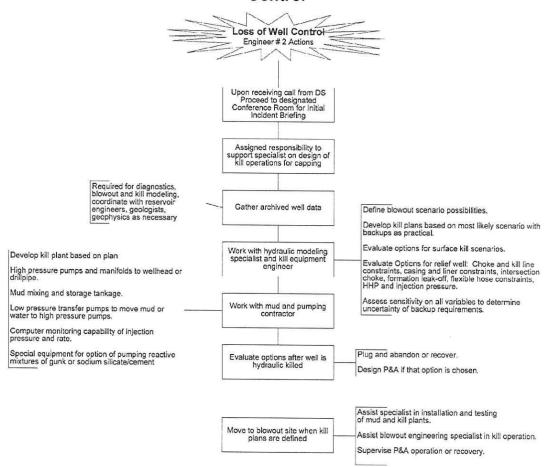
Refer to Figure 8-8 Engineer #2 (Kill Team) Response Guide - Loss of Well Control.

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Figure 8-8 Engineer #2 (Kill Team) Response Guide – Loss of Well Control



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8.11 Engineer # 3 (Relief Well Team)

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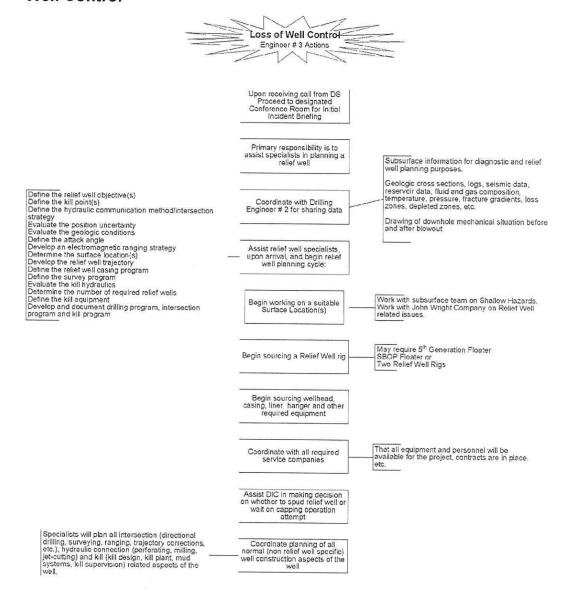
8.11.1 LEVEL 1: Routine Well Control

	Routine situational awareness within standard drilling report distribution or periodic updates.
	8.11.2 LEVEL 2: No SOP, Non-routine Well Control Event
	Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
	Review Level 3 Contingency Plans.
	8.11.3 LEVEL 3: Phase 3 – Sub-Surface Intervention - Relief Well
	Proceed to designated Conference room. Meet with WTL, SCSC and staff for Incident Briefing.
	Primary responsibility will be for assisting relief well specialists in planning and executing a relief well.
	Coordinate with Engineer #2 for sharing data from subsurface information for diagnostic and relief well planning purposes.
	Assist relief well specialists, upon arrival, and begin relief well planning cycle:
	The critical path will be locating a suitable relief well rig or locating a replacement BOP stack.
	Begin defining the surface location. Work on usual bathymetry and shallow hazard issues.
	Begin sourcing relief well rig. May be necessary to suspend other GoM DWP well to use that rig.
	Begin sourcing wellhead, casing, liner, hanger and other required equipment.
	Coordinate with all required service companies that all equipment and personnel will be available for the project.
	Assist WTL in making decision on whether to mobilize rig and spud relief well or wait on
	surface capping operation depending on probability of success.
J	Plan all conventional well related (non-relief well specific) aspects of the relief well. Specialists will plan all intersection (directional drilling, surveying, ranging, trajectory corrections, etc.), hydraulic connection (perforating, milling, jet-cutting) and kill (kill design, kill plant, mud systems, kill supervision) related aspects of the well. Refer to Figure 8-9.

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Figure 8-9 Engineer #3 (Relief Well Team) Response Guide - Loss of Well Control



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8.12 Engineer #4 (Capping Team)

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8.12.1 LEVEL 1: Routine Well Control

_		
		Routine situational awareness within standard drilling report distribution or periodic updates
	\bigcirc	8.12.2 LEVEL 2: No SOP, Non-routine Well Control Event
	Ма	Situational awareness within standard drilling report distribution unless Incident nagement Team is activated. Be available for consultation or update as necessary.
		Review Level 3 Contingency Plans.
		8.12.3 LEVEL 3: Phase 2 – Surface Intervention - Capping
	for	Proceed immediately to the designated Conference room. Meet with WTL, SCSC and staff incident briefing.
		Support Source Control Branch Director in tactical preparation for capping operations.
		Assist Source Control Branch Director as directed. For example:
		Document initial site assessment for the IMT
		Assist in defining firewater system for capping support. Define size and number of pumping units will be required operating 24 / 7.
		Assist in engineering support for fabrications for: firewater manifolds, heat shields, Venturi tubes, etc.
		Assist in sourcing capping and related equipment: Jet-cutter; capping stack, diverter lines, side outlet valves, closing unit, choke manifold, snubbing unit, wellhead, etc.
		Assist in developing General Surface Intervention Strategy.
		Work with DE #1 and #2 on the preparation for kill operation as necessary.
		Make daily report for Source Control Branch.

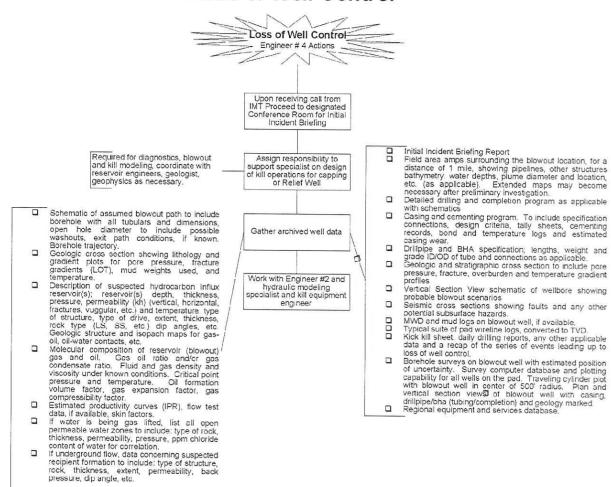
Refer to Figure 8-7 Engineer #1 Response Gu	uideline – Loss of Well Control.
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Figure 8-10 Engineer #4 (Capping) Response Guideline – Loss of Well Control



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8.13 Incident Commander Checklist for Level 3 - Blowout



8.13.1 LEVEL 1: Routine Well Control

Routine situational awareness within standard drilling report distribution or periodic updates.
8.13.2 LEVEL 2: No SOP, Non-routine Well Control Event
Situational awareness within standard drilling report distribution and periodic updates (i.e. every 4 hours or significant events) as needed. Prepared to assume IC duties if Incident Management Team is activated. Be available for consultation or update as necessary.
Review action plans with WPM/WTL as appropriate.
Review Level 3 Contingency Plans



8.13.3 LEVEL 3 - Loss of Control

8.13.4 Role

The Incident Commander is responsible for the overall management of incident response operations, and for serving as the Incident Management Team's (IMT's) primary contact person with all involved or interested external parties.

8.13.5 Responsibilities

The Incident Commander will ensure that personnel safety is accorded the highest priority during conduct of incident response operations. The Incident Commander is responsible to:

- establish and maintain an organization that is capable of providing management direction to, and support for, at-the-scene tactical response operations,
- supervise incident response operations and ensure that they are carried out in a manner consistent with company policy, appropriate government directives, and the needs and concerns of impacted areas,
- · analyze incident potential,
- establish strategic objectives and response priorities and ensure IMT and tactical response personnel
 are carrying out incident response operations in a manner consistent with objectives and priorities,
- ensure that all required and appropriate notifications have been made to BP senior management (i.e., business and BST), government agencies, and BP's partners,
- keep BP senior management informed of nature and status of incident and incident response operations,
- serve as primary on-site contact person for BP senior management, government representatives, and BP's partners,

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- review and approve requests for non-BP owned response resources, allocated critical resources, and authorize demobilization of resources,
- ensure that source control and response operations are carried out safely and closely coordinated,
- monitor and evaluate effectiveness of source control and response operations,
- serve as BP's primary spokesperson with news media,
- review and approve press releases and statements as they relate to incident response operations,
- · approve and authorize implementation of incident action plans,
- approve and authorize implementation of general plan.
- · consider need for an alternate or backup person for extended (24-hour) coverage
- · compile and maintain appropriate documentation.

8.13.6 Incident Commander - Well Blowout - Source Control Considerations

The generic IMS/ICS was originally designed to manage the response to large forest fires covering multiple jurisdictions and later adapted for large-scale oil spills, which has many similarities. The current BP IMS is patterned after the oil spill model and has been shown to work effectively for that purpose. The term "source control" is a term generated by oil spill responders which basically means stopping the oil at the source, for example isolating a pipeline or repairing a ship leak. The current plans where developed by spill responders with experience in these types of incidents, and the source control functional duties reflect that experience. Major oil spills in conjunction with a well blowout are rare so there has not been the same effort in adapting the current oil spill plan to effectively managing a well blowout which may or may not have a spill involved. Because of this several things should be considered when using the IMS checklists as a guide during a major blowout incident. For example;

- Evaluate the incident and the response priorities after the initial evacuations and SAR are complete. If the blowout is far from shore or there is no oil spill evolved, Source Control will be the primary focus. This should be the case for most of DWP.
- If Source Control is the primary focus, the Operations Section Chief should also be the Source Control Section Chief and the On-scene commander should also be the Source Control Branch Director. In almost every major sustained offshore blowout where there is a surface control operation a very senior (usually VP level) company representative is on board the TCP assuming the role of OSC.
- If Source Control is considered to not be the primary focus, consider the Source Control Section Chief
 as the Operations SC deputy and the Source Control Branch Director as the Deputy OSC. In this way
 communications should be more efficient.
- If surface control operations are attempted, most tactical plans and many strategic plans are made onscene. This is due to the specialized nature of the work and the fact that the blowout specialists are onscene (thus the requirement for a senior OSC). So IAP are commonly coming from the scene for approval rather than being generated by the IMT in the office and sent to the OSC.
- Many of the strategic planning team, those planning how the well will be killed and those planning the
 relief well should mobilize offshore to help implement the plans as part of the tactical teams.
- A well blowout may change its scenario or additional information may be gained during intervention that will require a change in strategy.
 If changes occur, challenge the current strategy.
- Make sure operations are not attempted that do not have a recovery plan if failure occurs (Do not allow the tactical team to just try things and see what happens).
- Do not allow potentially dangerous operations that are not essential. For example, five blowout responders where burned to death, attaching a pump-in sub to a broached blowout while relief wells

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- where being drilled. It was nice to have the ability to pump into the blowout as well as intersect with a relief well, but it was not essential.
- Long term staffing issues must be addressed for all key personnel and contractors if the recovery is going to take more than 30 days. Working 24/7 with little sleep will quickly cause burn-out, poor decision making, anxiety, agitation and confrontation between team members. Each person's personality will dictate how long this may take. Supervisors must assess their team members and rotate as required. When practical, work personnel no longer than 12 hr shifts and provide rotation personnel or at least breaks within 30 days, particularly for those personnel stationed offshore.

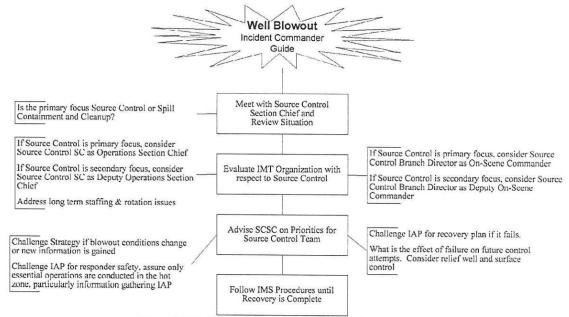


Figure 8-1: Incident Commander Checklist for Source Control

8.14 Wells Ops Manager - Deputy incident Commander (DIC)



8.14.1 LEVEL 1: Routine Well Control

Routine situational awareness within standard drilling report distribution or periodic updates.



8.14.2 LEVEL 2: No SOP, Non-routine Well Control Event

Situational awareness within standard drilling report distribution and periodic updates (i.e. every 4 hours or significant events) as needed. Prepared to assume DIC duties if Incident Management Team is activated. Be available for consultation or update as necessary.

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	Review a	ction plans with WTL as approp	priate.	
	Review Le	evel 3 Contingency Plans.		
		(4)		
	8.14.3	LEVEL 3: Phase 1 – Initial Re	esponse	
	or Emergen Notify Per been activat	erring with direct report, approcy Well Control Response. formance Unit Leader (PUL) thed. Notifies required managements in the Second Sec	nat Level 3 Emergency nent of situation.	
0000	Confirm the Provide a Maintain of	meetings. nat Contingency Plan is being to any questions and solutions to any questions with managen esponsibility for control of total	uestions that arise. nent as to the status o	f the well.
	8.14.5	_EVEL 3: Phase 3 – Sub-Suri	face Intervention	
	Review re Review/A Maintain o ub-surface	meetings. commendations and justification pprove budgeting and acquisitic communications with managen intervention plans esponsibility for control of total	on requirements for renent as to the status a	elief well(s) as appropriate.
	8.14.6 [_EVEL 3: Phase 4 – Well Rec	overy Operations	
		meetings. I condition is under control and pordination of re-start of other c		
□ _{+/}	Maintain o	communications with managem	nent as to the status of	f the well and status of return
(i		erations of affected wells/facilit cess of capturing lessons learr		valuation phase
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Assume responsibility for control of total project.



8.14.7 LEVEL 3: Phase 5 - Post Incident Evaluation

- □ Review final report from Well Control Service Provider.
- Review the findings of internal lessons learned investigations and studies.
- ☐ Maintain communications with management as to the status of the well and post incident evaluations/lessons learned.

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8.15 Leader Designate



8.15.1 LEVEL 1: Routine Well Control
□ Routine situational awareness within standard drilling report distribution or periodic update:
8.15.2 LEVEL 2: No SOP, Non-routine Well Control Event
□ Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
□ Review Level 3 Contingency Plans.
8.15.3 LEVEL 3: Phase 1 – Initial Response
 Once notified by Source Control Section Chief (SCSC), contact all Team Leaders of Emergency Well Control Response Teams and notify them that Level 3 status of Contingency Plan for Emergency Well Control Response has been activated. Schedule and conduct a meeting of all Team Leaders as soon as possible to brief everyon on the emergency situation.
8.15.4 LEVEL 3: Phase 2 – Surface Intervention
 Assist Source Control Section Chief (SCSC), with communications to various Team Leaders. Schedule meetings on a regular basis (recommended minimum of daily meetings during well control operations) for updates from various Team Leaders. Keep Source Control Section Chief (SCSC), informed of any developments at well location or within teams. 8.15.5 LEVEL 3: Phase 3 – Subsurface Intervention
 Assist Source Control Section Chief (SCSC), with communications to various Team Leaders. Schedule meetings on a regular basis for updates from various Team Leaders Keep Source Control Section Chief (SCSC), informed of any developments at well location or within teams.

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8.15.6 LEVEL 3: Phase 4 - Well Recovery

- ☐ Assist Source Control Section Chief (SCSC), with communications to various Team Leaders.
- Schedule meetings on a regular basis for updates from various Team Leaders.
- ☐ Keep Source Control Section Chief (SCSC), informed of any developments at well location or within teams.



8.15.7 LEVEL 3: Phase 5 - Post-incident Evaluation

Review all Post Incident Reports with Source Control Section Chief (SCSC), and Team Leaders.

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8.16 BP Field Representative - Operations



8.16.1 LEVEL 1: ROUTINE WELL CONTROL

At the occurrence of a well control incident, the BP Field Representative determines that the situation warrants a Level 1 status. The Field Representative quickly responds to the situation:
☐ Follows standard operating procedures to resolve the situation
□ Notifies immediate supervisor.
8.16.2 LEVEL 2: No SOP, Non-routine Well Control Event
At the occurrence of a well control incident, the BP Field Representative determines that the situation warrants Level 2 status. Alternatively, the incident may be a Level 1 event that deteriorated into Level 2 category. The BP Field Representative quickly responds to the situation with the following protocol:
☐ Follow standard operating procedures (where these exist) to resolve the situation
□ Notify immediate supervisor.
☐ Contact Wells Team for consultation regarding situation.
Act before the situation escalates to a Level 3 status.

8.16.3 LEVEL 3: Loss of Well Control

At the occurrence of a well control incident, the BP Field Representative determines that the situation warrants a Level 3 status. Alternatively, the incident begin as a Level 1 event that deteriorated into Level 3 category, either from Level 2 or directly from Level 1. The BP Field Representative quickly responds to the situation.



8.16.4 LEVEL 3: Phase 1 - Initial Response

- □ Follow the Initial Response Checklist at Well site for Level 3 Emergency.
- With the assistance of the personnel on location, the following actions are taken:
- 1. Evacuate all well site personnel to the designated Safe Area.
- 2. Account for all personnel.
- 3. Determine injuries, if any, and assess the need for medical assistance.
- 4. Establish Hot (red) Zone area around well or rig per this document

NOTE: Do not re-enter the Hot (red) zone for any reason unless directed by responsible party.

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- 5. Notify local authorities, including the Police/Sheriff's Department, Fire Department, and ambulance/hospital as directed by supervisor.
- 6. Secure the location. Prevent access to the location.
- Contain fire by eliminating possible ignition sources and using available FiFi equipment for protective water spray if conditions are deemed safe.

Note: Do not attempt to extinguish fire.

- 8. Notify BP office of well conditions. Using Communications Record, record all conversations and events at well site.
- 9. Complete *Initial Status Report* and fax with Emergency Dispatch Information immediately to Well Control Service Provider
- 10. Contact Emergency Support Services as identified in this document.
- 11. Contain pollution and/or spill if can be done safely.
- 12. Monitor well conditions. Report any changes in well conditions.
- 13. Brief First Responder upon arrival on location.
- 14. Relinquish control of well site to OSC or designate upon arrival.
- 15. Assist as directed by OSC or designate.



8.16.5 LEVEL 3: Phase 2 - Surface Intervention

Assist as directed by OSC or designate.



8.16.6 LEVEL 3: Phase 3 - Subsurface Intervention

Assist as directed by OSC or designate.



8.16.7 LEVEL 3: Phase 4 - Well Recovery

Assist as directed by OSC or designate.



8.16.8 LEVEL 3: Phase 5 - Post-incident Evaluation

Assist OSC or designate with Post Incident Review and Evaluation.

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8.17 Well-Control Response Team: Engineering Team Leader



8.17.1 LEVEL 1: Routine Well Control

Routine situational awareness within standard drilling report distribution or periodic updates.
8.17.2 LEVEL 2: No SOP, Non-routine Well Control Event
Situational awareness within standard drilling report distribution unless Incident

Management Team is activated. Be available for consultation or update as necessary.

Review Level 3 Contingency Plans.



8.17.3 LEVEL 3: Phase 1 - Initial Response

- Complete Well Control Worksheet and fax to Well Control Service Provider. Attend initial meeting of Team Leaders to be briefed on well situation.



8.17.4 LEVEL 3: Phase 2 - Surface Intervention

- Complete compilation of field/well information as outlined in Required Well/Field Information. Send information to the attention of Well Control Service Provider Team Leader.
- Assist with any engineering requirements for well control.



8.17.5 LEVEL 3: Phase 3 - Subsurface Intervention

Assist with any relief well planning/engineering requirements.



8.17.6 LEVEL 3: Phase 4 - Well Recovery

- Assist with any engineering requirements for well recovery operations
- Assist with gathering information for internal reviews and lessons learned for post incident evaluation.

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8.17.7 LEVEL 3: Phase 5 - Post-incident Evaluation

Review all Post Incident Evaluations with SCSC.

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8.18 Logistics/Procurement Team Leader

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8.18.1 LEVEL 1: Routine Well Control

	
	Routine situational awareness within standard drilling report distribution or periodic updates
	8.18.2 LEVEL 2: No SOP, Non-routine Well Control Event
	Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
	Review Level 3 Contingency Plans.
Pre	e-Operational (Transition from Level 2 to Level 3)
	Complete Emergency Support Services, working with the BP WSL.
	Determine scope of Emergency Support Services listing—
	☐ Identify support services that may be required.
	☐ Identify support services and identify potential suppliers.
	Identify support services, identify suppliers, and negotiate contract with suppliers to provide support services.
	Confer with Administration Team Leader and Risk Management Leader to determine prope procedures for handling third party charges incurred due to well control incident. Identify any

special invoicing requirements, approvals, etc. that will be required in processing insurance



claims.

8.18.3 LEVEL 3: Phase 1 - Initial Response

Attend initial meeting of Team Leaders to be briefed on well situation.
If required, arrange transportation of well control service providers to well site.
If required, arrange transportation of well control equipment to well site.
Arrange housing and catering for well control employees and other support personnel.
Mobilize team members to well site to arrange housing, etc. for any local residents that
were evacuated from their homes.
Keep insurance provider informed as appropriate.

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Assist BP WSL with contacting third party vendors on Emergency Support Services listing and either putting them on Standby Alert status or authorize them to begin mobilizing to the well site.



8.18.4 LEVEL 3: Phase 2 - Surface Intervention

- Locate and secure services and products as ordered by SCSC and Well Control Service Provider Team Leader. Work with Risk Management Team Leader and Administrative Team Leader to maintain control over costs incurred.
- Keep insurance provider informed as appropriate.



8.18.5 LEVEL 3: Phase 3 - Relief Subsurface Intervention

- Locate and secure services and products as ordered by SCSC and Well Control Service Provider Team Leader. Work with Risk Management Team Leader and Administrative Team Leader to maintain control over costs incurred.
- Keep insurance provider informed as appropriate.



8.18.6 LEVEL 3: Phase 4 - Well Recovery

- Locate and secure services and products as ordered by SCSC and Well Control Service Provider Team Leader. Work with Risk Management Team Leader and Administrative Team Leader to maintain control over costs incurred.
- ☐ Keep insurance provider informed as appropriate.



8.18.7 LEVEL 3: Phase 5 - Post-incident Evaluation

☐ Review all Post Incident Evaluations with Well SCSC.

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8.19 Regulatory Team Leader



8.19.1 LEVEL 1: Routine Well Control

Routine situational awareness within standard drilling report distribution or periodic updates
8.19.2 LEVEL 2: No SOP, Non-routine Well Control Event
Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
Review Level 3 Contingency Plans.



8.19.3 LEVEL 3: Phase 1 - Initial Response

Confer with SCSC and confirm that proper notifications have been given to all required regulatory agencies.

Attend initial meeting of Team Leaders to be briefed on well situation.



8.19.4 LEVEL 3: Phase 2 - Surface Intervention

Mobilize team members to well site to assess potential risks that may have been incurred.
Complete any additional status reports to various regulatory agencies as may be required
Confer with Communications Team Leader and confirm that all public news releases mee
any special reporting requirements of the various regulatory agencies.
Notify SCSC of any potential problems or risks that may be incurred.
Confer with Environmental Team Leader regarding current status of pollution containment
and control.
Keep the various regulatory agencies informed as to the current status of well conditions and the ongoing well control efforts



8.19.5 LEVEL 3: Phase 3 - Subsurface Intervention

Keep the various regulatory agencies informed as to the current status of well conditions and the ongoing well control efforts.

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8.19.6 LEVEL 3: Phase 4 - Well Recovery

☐ Keep the various regulatory agencies informed as to the current status of well conditions and the ongoing well control efforts.



8.19.7 LEVEL 3: Phase 5 - Post-incident Evaluation

- Complete all final reports to the various regulatory agencies as required.
- Review all Post Incident Evaluations with SCSC.

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8.20 Communications Team Leader

Note: All news releases must be approved by the Regulatory Team Leader, Risk Management Team Leader, and Incident Commander, Deputy Incident Commander and Source Control Section Chief.



9	8.20.1 LEVEL 1: Routine Well Control
	Routine situational awareness within standard drilling report distribution or periodic updates.
	8.20.2 LEVEL 2: No SOP, Non-routine Well Control Event
	Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
	Review Level 3 Contingency Plans.
	8.20.3 LEVEL 3: Phase 1 – Initial Response
	Attend initial meeting of Team Leaders to be briefed on well situation. Prepare initial news release regarding current well conditions and company's response to the well control situation.
	Immediately issue news release after receiving proper approval.
	8.20.4 LEVEL 3: Phase 2 – Well Control
	Prepare daily news releases regarding current well conditions and status of well control operations.
	Coordinate all news conferences, company statements, news releases, interviews, etc. between the BP / well control service provider personnel and the news media.
	8.20.5 LEVEL 3: Phase 3 – Relief Well
	Prepare daily news releases regarding current well conditions and status of well control operations.
	Coordinate all news conferences, company statements, news releases, interviews, etc. between the BP / well control service provider personnel and the news media.

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8.20.6 LEVEL 3: Phase 4 - Well Recovery

- Prepare daily news releases regarding current well conditions and status of well control operations.
- □ Coordinate all news conferences, company statements, news releases, interviews, etc. between the BP / well control service provider personnel and the news media.



8.20.7 LEVEL 3: Phase 5 - Post-incident Evaluation

Review all Post Incident Evaluations with SCSC.

8.21 Risk Management Team Leader

Pre-Operational

- Verify insurance coverage in effect with SCSC.
- Confirm and review all Master Service Agreements in effect with all contractor, well service companies, etc. that may be performing their services on BP's well.

Confer with Logistics/Procurement Team Leader and Administration Team Leader to determine proper procedures for handling third party charges incurred due to well control incident. Identify any special invoicing requirements, approvals, etc. that will required in processing insurance claims.



8.21.1 LEVEL 3: Phase 1 - Initial Response

- Attend initial meeting of Team Leaders to be briefed on well situation. Provide other Team Leaders with overview of insurance coverage in effect.
- Contact insurance broker, advise of well situation.
- Provide written recap of insurance coverage in effect and Master Service Agreements (with contractors, servicing company, etc.) to Incident Commander and SCSC.
- Review and approve initial news releases prepared by Communications Team Leader.



8.21.2 LEVEL 3: Phase 2 - Well Control

- Mobilize to well to assess damages and review current well conditions with insurance adjuster.
- Investigate chain of events leading up to Level 3 status being activated. Get census of well site personnel at time of well control incident from BP Field Representative. Conduct interviews and take statements from all well site personnel.
- ☐ Review all medical injuries.

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0 0	Meet with local residents that may have been evacuated from well site area due to well conditions. With Insurance Adjuster, explain claim process and advise whom they can contact with the Risk Management Team Leader for any further questions. Confer with SCSC regarding any questions related to insurance coverage. Work with Logistics / Procurement Team Leader and Administration Team Leader to maintain daily estimate of total costs incurred to date on well control incident. Also, work with Environmental Team Leader to determine estimated costs to contain and control any pollution, plus estimated costs for soil remediation. Provide estimated total costs to SCSC and insurance adjuster on a daily basis.
	8.21.3 LEVEL 3: Phase 3 – Relief Well
	Confer with SCSC regarding any questions related to insurance coverage. Work with Logistics/Procurement Team Leader and Administration Team Leader to maintain daily estimate of total costs incurred to date on well control incident. Provide estimated total costs to SCSC and insurance adjuster on a daily basis.
	8.21.4 LEVEL 3: Phase 4 – Well Recovery
	Confer with SCSC regarding any questions related to insurance coverage. Work with Logistics/Procurement Team Leader and Administration Team Leader to maintain daily estimate of total costs incurred to date on well control incident. Provide estimated total costs to well SCSC and insurance adjuster on a daily basis.
	8.21.5 LEVEL 3: Phase 5 – Post-incident Evaluation
	Complete final report of insurance coverage vs. total costs incurred in well control operations. Review all Post Incident Evaluations with SCSC.

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8.22 Administrative Team Leader



8.22.1 LEVEL 1: Routine Well Control

Routine situational awareness within standard drilling report distribution or periodic updates.
8.22.2 LEVEL 2: No SOP, Non-routine Well Control Event
Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
Review Level 3 Contingency Plans

Pre-Operational

Confer with Logistics/Procurement Team Leader and Risk Management Team Leader to determine proper procedures for handling third party charges incurred due to well control incident. Identify any special invoicing requirements, approvals, etc. that will be required in processing insurance claims.



8.22.3 LEVEL 3: Phase 1 - Initial Response

- Attend initial meeting of Team Leaders to be briefed on well situation.
- ☐ With the approval of the SCSC mobilize an Administration Team member to the well location to work with Logistics/Procurement Team in setting up process to properly account for costs incurred in the well control efforts.



8.22.4 LEVEL 3: Phase 2 - Well Control

- Maintain communications with Risk Management Team Leader and insurance adjuster regarding proper handling of third party vendor invoices.
- Process all third party vendor invoices as received for services/products provided in completing well control operations.
- Maintain detailed cost analysis of all costs incurred in well control operations.



8.22.5 LEVEL 3: Phase 3 - Relief Well

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Maintain communications with Risk Management Team Leader and insurance adjuster regarding proper handling of third party vendor invoices.
Process all third party vendor invoices as received for services/products provided in completing well control operations.
Maintain detailed cost analysis of all costs incurred in well control operations.
8.22.6 LEVEL 3: Phase 4 – Well Recovery
Maintain communications with Risk Management Team Leader and insurance adjuster regarding proper handling of third party vendor invoices.
Process all third party vendor invoices as received for services/products provided in completing well control operations.
Maintain detailed cost analysis of all costs incurred in well control operations.
8.22.7 LEVEL 3: Phase 5 – Post-incident Evaluation
Provide detailed cost analysis of all costs incurred in well control project to Deputy Incident Commander, SCSC, and Risk Management Team Leader.

Review all Post Incident Evaluations with SCSC.

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8.23 Environmental Team Leader

8.23.1 LEVEL 1: Routine Well Control
Routine situational awareness within standard drilling report distribution or periodic updates.
8.23.2 LEVEL 2: No SOP, Non-routine Well Control Event
Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
Review Level 3 Contingency Plans.
Pre-Operational Identify all regulatory agencies that must be contacted in the event of a spill or release.
8.23.3 LEVEL 3: Phase 1 – Initial Response
 Attend initial meeting of Team Leaders to be briefed on well conditions. Confirm with SCSC and Regulatory Team Leader that all required regulatory agencies have been contacted and advised of the well situation. Mobilize Environmental Team members to well location to: Assess damages caused by pollution
 Ensure that all measures are being used to contain and control pollution. Monitor environmental impact.
8.23.4 LEVEL 3: Phase 2 – Well Control
Work closely with SCSC and Well Control Service Provider Team Leader to contain spill/pollution without interfering with well control efforts. Make assessment of damages caused by pollution. Advise Rick Management Team Leader.
Make assessment of damages caused by pollution. Advise Risk Management Team Leader

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Confer with Logistics/Procurement Team Leader regarding requirements for cleanup.

of estimated costs to be incurred to complete clean-up action.

Begin clean-up efforts.

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8.23.5 LEVEL 3: Phase 3 - Relief Well

Continue clean-up efforts.



8.23.6 LEVEL 3: Phase 4 - Well Recovery

Continue clean-up efforts.



8.23.7 LEVEL 3: Phase 5 - Post-incident Evaluation

- Complete all final reports as required by environmental regulatory agencies.
- Review all Post Incident Evaluations with SCSC.

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8.24 HSSE Team Leader

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8.24.1 LEVEL 1: Routine Well Control

Routine situational awareness within standard drilling report distribution or periodic update	es
8.24.2 LEVEL 2: No SOP, Non-routine Well Control Event	
Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.	

Review Level 3 Contingency Plans.



8.24.3 LEVEL 3: Phase 1 - Initial Response

- Attend initial meeting of Team Leaders to be briefed on well situation.
- Mobilize Safety Team members to well location to:
- 1. Assist with securing the location
- 2. Set up monitors for air quality, H₂S, and LEL as required
- 3. Maintain current and accurate census of well site personnel
- 4. Assist with any medical emergencies



8.24.4 LEVEL 3: Phase 2 - Well Control

Assist Well Control Service Provider Team Leader with conducting daily Safety Meetings.
Review Work Zone boundaries around well daily with ell Control Service Provider Team
Leader and make changes as required due to weather conditions, well conditions, etc.
Arrange for Emergency Medical Technicians/Ambulance service to be at well site during entirety of well control operations.
Maintain current and accurate census of all personnel at well site.
Monitor air quality, H ₂ S, and LEL, and keep SCSC informed of situation.
Confirm that all personnel providing services within the various work zones are wearing
proper personal safety equipment.
Ensure that all third party vendors meet all safety requirements.
Monitor weather conditions and advise SCSC of any impending weather that may affect current well control operations

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8.24.5 LEVEL 3: Phase 3 - Relief Well

Assist the Control Service Provider Team Leader with conducting daily Safety Meetings. Review Work Zone boundaries around well daily with the Control Service Provider Team Leader and make changes as required due to weather conditions, well conditions, etc. Arrange for Emergency Medial Technicians/Ambulance service to be at well site during entirety of well control operations. Maintain current and accurate census of all personnel at well site. Monitor air quality, H ₂ S, and LEL, and keep SCSC informed of situation. Confirm that all personnel providing services within the various work zones are wearing proper personal safety equipment. Ensure that all third party vendors meet all safety requirements. Monitor weather conditions and advise SCSC of any impending weather that may affect current well control operations.
8.24.6 LEVEL 3: Phase 4 – Well Recovery
Assist the Control Service Provider Team Leader with conducting daily Safety Meetings. Review Work Zone boundaries around well daily with Well Control Service Provider Team Leader and make changes as required due to weather conditions, well conditions, etc. Arrange for Emergency Medial Technicians/Ambulance service to be at well site during entirety of well control operations. Maintain current and accurate census of all personnel at well site. Monitor air quality, H ₂ S, and LEL, and keep SCSC informed of situation. Confirm that all personnel providing services within the various work zones are wearing proper personal safety equipment. Ensure that all third party vendors meet all safety requirements. Monitor weather conditions and advise SCSC of any impending weather that may affect current well control operations.
8.24.7 LEVEL 3: Phase 5 – Post-incident Evaluation
Complete final Safety Report for Deputy Incident Commander and SCSC. Review all Post Incident Evaluations with SCSC.

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8.25 Well Control Service Provider Team Leader

Pre-Operational

Review Contingency Plan



8.25.1 LEVEL 1: Routine Well Control

Be available for consultation with BP WSL as no	ecessary.
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\bigcirc	8.25.2 LEVEL 2: No SOP,	Non-routine Well Control Event

Be available for consultation with BP WSL as necessary.



8.25.3 LEVEL 3: Phase 1 - Initial Response

Once Level 3 status has been activated, Well Control Service Provider Team Leader is contacted by SCSC and advised of well control situation. Well Control Service Provider Team Leader is assigned by Well Control Service Provider.

Well Control Service Provider Team Leader receives Emergency Dispatch Information and
completed Initial Status Report from BP's WSL at the well location.

- Reviews and evaluates information.
- Contact nearest Well Control First Responder. Direct the First Responder to mobilize to well site immediately.
- Contact additional Well Control Specialists and put on alert status for possible mobilization to well location.
- Receive initial report from Well Control First Responder after reaching location. Evaluate data to determine personnel and equipment needs.
- Consult with SCSC regarding current situation and make recommendations for personnel and equipment needs.
- Mobilizes additional Well Control Specialists and well control equipment to well location as agreed upon.
- ☐ Mobilize to well location to supervise well control operations.



8.25.4 LEVEL 3: Phase 2 - Well Control

☐ Upon arrival at well location, review current well situation with Well Control First Responder, SCSC, and BP's WSL.

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	Manage well control operations. Determine water needs for firefighting and capping operations.
	Receive Well Control Incident Worksheet and Required Well/Field Data Information received from the Engineering Team. Evaluate information and determine recommendations/options for review with SCSC.
	Maintain constant communications with SCSC.
	Work with HSSE Team Leader to conduct daily safety meetings at well location.
	Establish work zone areas for well control operation.
	Monitor work zone boundaries and make adjustments as needed. Post the Emergency Response Map at the Forward Command Center daily.
	Maintain daily census of personnel on location.
	Approve all support personnel that must enter designated Work Zones.
	Complete daily field report.
	Determine charges to BP and approves all invoicing of well control operations to BP.
	8.25.5 LEVEL 3: Phase 3 – Relief Well
	Oversee intervention operations
6	
	8.25.6 LEVEL 3: Phase 4 – Well Recovery
	Discuss well control operations and determine well control options with BP.

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8.26 Well Control First Responder

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8.26.1 LEVEL 1: Routine Well Control

	fro		ituational awareness within sta eam Leader.	andard drilling report d	istribution or periodic updates
	\bigcup	8.26.2	LEVEL 2: No SOP, Non-rout	ine Well Control Eve	nt
	OII	Situationa M/WSL (As	al awareness within standard d s Appropriate) Be available for	rilling report distributio consultation or updat	on unless updated by te as necessary.
		Review Le	evel 3 Contingency Plans and	Spar/Platform/Facility	ERP.
		8.26.3 [LEVEL 3: Phase 1 – Initial Re	sponse	
	and unt	Complete Complete d rescue of	o well location as soon as direct initial assessment of well situate evacuation of rig personnel to f Hot (red) Zone for any missin assistance is available.	ation on site using the Safe Area. If required	First Responder checklist. I, make initial plans for search
			severity and complexity of well	control situation.	
		Identify ri	isks.		
		Identify a	and eliminate possible ignition s	sources.	
		Determin	e status of well control situatio	n—deteriorating, stab	le, or improving?
		Determin	e time window for effective res	ponding.	
		Assess g	eneral damage to location.		
		Employ a	all available safety measures.		
			what resources will be require	ed to successfully rega	ain control of well, as pertains
	to:			, ,	periamo
		Well cont	trol personnel		
		Well cont	trol equipment		
		Third par	ty services		
		Other res	sources.		
		Communic	cate findings to Well SCSC or	designate as soon as	possible.
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Review needs for third party services companies from Emergency Support Services' list with the BP WSL.
Review and confirm placement of Safe (blue) Zone for well control operations.
Review and establish preliminary boundaries of Hot (red) Zone.
Set up initial fire suppression measures. Take necessary steps to contain and control pollution.
Identify water source and begin work in setting up for water storage on location.
Brief Well Control Service Provider Team Leader of current well situation upon arrival at well location.
Assist wherever needed.
8.26.4 LEVEL 3: Phase 2 – Well Control
Assist as directed by SCSC or designate
8.26.5 LEVEL 3: Phase 3 – Relief Well
Assist as directed by SCSC or designate
8.26.6 LEVEL 3: Phase 4 – Well Recovery
Assist as directed by SCSC or designate
8.26.7 LEVEL 3: Phase 5 – Post-incident Evaluation
Assist SCSC in developing Post Incident Review and Evaluation

Assist SCSC in developing Post Incident Review and Evaluation.

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8.27 Well Control Response Team – Relief Well Intervention

8.27.1 LEVEL 1: Routine Well Control
Routine situational awareness within standard drilling report distribution or periodic updates.
8.27.2 LEVEL 2: No SOP, Non-routine Well Control Event
Situational awareness within standard drilling report distribution unless Incident Management Team is activated. Be available for consultation or update as necessary.
Review Level 3 Contingency Plans.
8.27.3 LEVEL 3: Phase 1 – Initial Response
Under directions of Well Control Service Provider Team Leader, mobilize to well location as quickly as possible.
Review Initial Status Report from BP WSL and Well Control First Responder. Confer with Well Control Service Provider Team Leader at well location.
8.27.4 LEVEL 3: Phase 2 – Well Control
Review Well Control Worksheet furnished by Engineering Team.
 Review, with Well Control Service Provider Team Leader, the Required Well/Field Information as furnished by Engineering Team.
Review designated Safe Area and make any recommendations for changes to Well Control Service Provider Team Leader. After receiving approval, make necessary changes in size and

□ equipment staging □ firefighting pumps Authority WCTA Custodian Engineering Authority - Sprague Issue Date January, 2010 Document Owner SPLI WC TA Shaughpages	Inches Date			
irrefighting pumps		V5/2007-05/4VEX	Custodian	Engineering Authority - Sprague
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equipment staging	☐ firefi	ghting pumps		
	☐ equi	oment staging		

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Work with Well Control Service Provider Team Leader to lay out location for:

Determine immediate needs and confer with Logistics/Procurement Team Leader as to

Set up Forward Command Center in the Safe (blue) Zone.

priorities for support services.

□ water storage

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\Box		Conduct well control	operations:	
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- Analyze options provided by Well Control Response Team Engineering
- □ Develop surface intervention strategy
- Coordinate firefighting efforts
- ☐ Supervise / participate removal of debris from wellhead area
- Design capping assembly to be used. Work with Logistics/Procurement to provide the assembly
- Cap well, regaining control of well flow.



8.27.5 LEVEL 3: Phase 3 - Relief Well

None



8.27.6 LEVEL 3: Phase 4 - Well Recovery

None

None 8.27.7 LEVEL 3: Phase 5 – Post-incident Evaluation



- Submit final report on well control operations to SCSC or designate.
- Review all Post Incident Evaluations with SCSC or designate.

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8.28 Well Control Response Team – Sub-surface Intervention

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8.28.1 LEVEL 1: Routine Well Control

Routine situational awareness within standard drilling report distribution or periodic update	s
8.28.2 LEVEL 2: No SOP, Non-routine Well Control Event	
Situational awareness within standard drilling report distribution unless Incident	

Review	Level	3	Contingency	Plans.



8.28.3 LEVEL 3: Phase 1 - Initial Response

- ☐ Review Initial Status Report completed by BP WSL.
- Review Well Control Worksheet completed by Engineering Team.
- □ Review Required Well/Field Information completed by Engineering Team



8.28.4 LEVEL 3: Phase 2 - Well Control

None



8.28.5 LEVEL 3: Phase 3 - Relief Well

- ☐ Under direction of SCSC, begin engineering and planning for relief well.
- Determine optimum relief well profile using various software programs.
- Discuss and explain all options for relief well to Well Control Service Provider Team Leader and the SCSC.
- ☐ If required, develop kill program for relief well.



8.28.6 LEVEL 3: Phase 4 - Well Recovery

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- Develop options for recovering the well bore once the well has been brought under control.
- □ Discuss options for well recovery with Well Control Service Provider Team Leader and the SCSC.



8.28.7 LEVEL 3: Phase 5 - Post-incident Evaluation

Review all Post Incident Evaluations with SCSC.

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- 9 Appendix 1 Thunder Horse
- 10 Appendix 2 Atlantis
- 11 Appendix 3 Holstein
- 12Appendix 4 DW Horizon
- 13Appendix 5 Development Driller II
- 14Appendix 6 Development Driller III
- 15Appendix 7 Discoverer Enterprise

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