

**NOTIFICATION OF INCIDENTS OF NONCOMPLIANCE**

Page 1 of 1  
Date 10/4/2010  
Time: (24 HIR clock)  
14:00  
MMS Rep: (Last Name-Print)  
Domangue

You are hereby ordered to correct any identified Incident of Noncompliance(INC) listed below. You have the right to appeal any INC notification in accordance with Title 30CFR, part 290. You must file your appeal in the office of the official issuing this Notification. However, the filing of an appeal will not suspend the requirement to comply with this Notification

MMS Office Address U.S. Department of the Interior Minerals Management Service Houma District Post Office Box 760 Bourg, La. 70343-0760	Lease No. G 23579	Area and Block: GC 787	Facility/Rig and Well No. A (Atlantis)
	Lease Operator (Print) BP Production Inc.	Drill, Prod, P/L Contractor (Print)	Turnkey Company: (Print)

Enforcement Action: W - Warning C - Component Shut-in S - Facility Shut-in

PINC No.	Enf. Action	Authority 30 CFR 250	INC Description and any Special Orders (shut-in of operations, facility, wells, etc.)	Date Corrected
G-802	W	802	Operations are not being conducted in accordance to approved applications. During the review of drawings for the Atlantis Congressional Investigation, it was noted that the Houma District does not possess the current revision of the following documents:  Topsides General Arrangement (GA): 1440-20-ME-DG-0512/513/514/517/518/520/551/552, 1440-20-ME-DG-553/554/540(1/2)/541(1/2)/542(1/2). Hull GA: All 1440-50-GE-DG-030-101 thru 116 and 1440-50-GE-DG-30-6001 thru 6004. Topsides Safety Plan: 1440-20-HS-DG-1000 and 3001. Hull Safety Plan: 1440-50-SA-DG-070-5501(1-4)/5502(1-4)/5503(1-4)/5504(1-4)/5505(1-4). Topsides One Line: 1440-20-EL-DG-6010/6011/6015(1-4,6-10,12-15)/6030(4)/6041(1-3), 1440-20-EL-DG-6042(1-3)/6046(1,3-5)/6051(1)/6052(1-3), 1440-20-EL-DG-6064(1-2)/6071(1,3)/6072(1-2)/6073(1-2). Hull One Line: All 1440-50-EL-DG-910/911/912/914/931/972. Hazardous Area Classification: 1440-20-EL-DG-6401-002/4/6/7/8/9/10, and 1440-20-EL-DG-6402-002/3/4/6/7/8/9/10.  Within 14 days of receipt of this notice, you are required to submit a letter of explanation to the District Manager including steps to be taken to ensure this will not recur. The letter must accompany the signed and dated green copy of this form.	

MMS Representative <i>Bryce A. Domangue</i> Signature 10/4/10	Operator Representative Print Last Name _____ Signature _____ Date _____
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The operator must insert in the "Date Corrected" column the date each INC was corrected; sign and date the green copy of this form; and return it to the MMS office identified above no later than 14 DAYS from the date of issuance. If the green copy cannot be returned within the allotted time, the operator must obtain a waiver from the appropriate MMS office. This process should ensure that onshore operator management is aware and acknowledges that INCs were issued on this facility, on this date, but in no way delays any enforcement action taken

Unless specifically ordered otherwise, the operator representative must correct and inspect all components and facility shut-in INCs identify and notify the issuing MMS office before returning to operations.

Manager/Supervisor: I, the undersigned, certify each Incident of Noncompliance listed above has been corrected on the corresponding date.

Print Last Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

Small Business Statement: Your comments are important. The Small Business and Agriculture Regulatory Enforcement Ombudsman and ten Regional Fairness Boards were established to receive comments from small businesses about federal agency enforcement actions. The Ombudsman will annually evaluate the enforcement activities and rate each agency's responsiveness to small business. If you wish to comment on the actions of MMS call 1-888-REG-FAIR(1-888-734-3247). You may comment to the Small Business Administration without fear of retaliation. Disciplinary action for retaliation by an MMS employee may include suspension or termination from employment with the Department of the Interior.

Paperwork Reduction Act of 1995(PRA) Statement: The PRA (44 U.S.C. 3501 et seq.) requires us to inform you that MMS collects this information to ensure that facility management is knowledgeable of the incident of non-compliance issued; corrective action is taken in a reasonable period of time; and for component or facility shut-in enforcement actions, that the identified component or facility is not returned to operation without the prior notice to the appropriate MMS office. Responses are mandatory (43 U.S.C. 1331 et seq.) No proprietary information is collected. An agency may not conduct or sponsor, and you are not required to respond to a collection of information unless it displays a currently valid OMB Control Number. Public reporting burden for this form is estimated to average 2 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. You may direct comments regarding the burden estimate or any other aspect of this form to the Information Collection Clearance Officer, Mail Stop 4230, Minerals Management Service, 1849 C Street, NW, Washington, DC 20240.



**Dr. Simon P. Todd**  
Vice President  
Gulf of Mexico Thunder Horse



**BP Exploration & Production Inc.**  
200 Westlake Park Boulevard  
Post Office Box 4587  
Houston, Texas 77210-4587

**VIA FEDERAL EXPRESS**

October 20, 2010

Mr. Bryan Domangue  
District Supervisor  
Bureau of Energy Management and Regulatory Enforcement  
Houma District  
3804 Country Drive  
Bourg, LA 70343

Re: Incident of Noncompliance – October 4, 2010  
OCS G 23579, GC787 A

Dear Mr. Domangue,

BP Exploration & Production Inc. received the attached Notification of an Incident of Noncompliance (INC) from the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) on October 7, 2010. A signed copy of Form MMS-1832 attached to this response letter shows the correction date.

The INC states that during the review of the drawings for the Atlantis Congressional Investigation it was noted that the Houma District does not possess the current revision of certain drawings being used by Atlantis engineering and operational personnel. Those drawings are being transmitted today under separate cover to your office, together with a letter requesting review and approval of a Production Safety System Modification Application.

Please note the following with respect to these drawings:

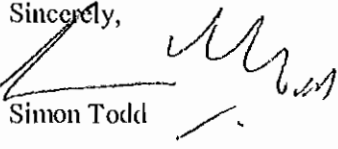
1. In February 2009, BP submitted a full set (22 drawings) of the up-to-date Safety Plans to the Minerals Management Service. Six of the Safety Plans have been revised since this February 2009 submittal to add a new oxygen scavenger (non-hydrocarbon) tank on the main deck, add a chemical distribution skid in the riser bay, and add some galley-related equipment outside of the deck house. BP is currently in the process of putting the oxygen scavenger tank into service, pursuant to the BOEMRE's approval. The chemical distribution skid has not been hooked up, and BP does not intend to put it into service until 2011.
2. The changes to the electrical drawings primarily reflect as-built documentation updates to ensure that engineering and operational personnel have current drawings for their use.

3. Various drawings include references to the new pigging pump, which is planned but has not yet been installed, and which will be installed in 2011. BP will make the requisite filing for the addition of this pump at the appropriate time.

A thorough review of the design, installation, and operation of critical safety systems per 30 CFR 250.802 continues to be conducted on a regular basis through the submission and review by BOEMRE of the SAFD and SAFE Charts in accordance with the API RP 14C processes.

To reduce the risk of re-occurrence BP will modify our procedures to ensure that General Arrangement, Fire and Safety Plans, One-Line, and Hazardous Area Classification Drawings are included with the submission of SAFD and SAFE Charts.

Sincerely,

  
Simon Todd

Minerals Management Service

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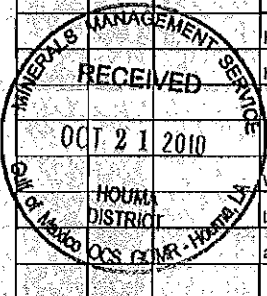
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TODD, Simon  
Print Last Name  
Signature  
Date 10/20/10.

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