Real Time Monitoring
BSEE Objectives

Office of Offshore Regulatory Programs
New BSEE Initiatives

- Best Available and Safest Technology (BAST).
- Near-miss/failure reporting.
- Life cycle management of critical equipment.
- Risk Based Inspections.
- Third party verification and certification.
- Real time monitoring (RTM) of facilities.
Compliance Oversight

• BSEE must perform inspections once per year.
• Helicopter cost and technical staff resource challenges.
• Verification of safety critical equipment.

....and Performance Based Assessment
Why RTM?

• Over 3000 offshore facilities.
• More than 50 deep water rigs.
• Activities offshore Gulf of Mexico, Alaska, and California.
• Facilities located 3 to 125 miles offshore.
• Range in size of facilities and operators.
• Subsea equipment.
Potential Benefits

• More cost effective and focused inspections.

• More timely data available to identify and assess risks.

• Possible flexibility related to equipment verification.

• Demonstrated performance.
RTM in the Regulatory Program

• Need for industry standards?
• Deepwater; HT/HP; shallow water?
• When, where, and by whom?
  • Roles
  • Physical Testing/witness vs. certifications/reliability
• Barriers?
  • Cost?
  • Technical?
BOP Proposed Rule

• Enhance existing BOP/WC technology oversight by creating new 30 CFR 250, subpart G—Well Operations and Equipment

• Improve equipment reliability

• Incorporate numerous standards, along with specifications of best practices developed by industry consensus

• Implement recommendations from the Deepwater Horizon investigations (including RTM)
Real Time Monitoring in a Proposed Rule....

• ...gather and monitor real-time well data using an independent, automatic, and continuous monitoring system capable of recording, storing, and transmitting all aspects of:
  ✓ The BOP control system;
  ✓ The well’s fluid handling systems on the rig; and
  ✓ The well’s downhole conditions with the bottom hole assembly tools

• ....immediately transmit these data as they are gathered to a designated onshore location where they must be monitored by qualified personnel who must be in continuous contact with rig personnel during operations
Website: www.bsee.gov
Changes

- Create new content related to well operations and equipment (New Subpart G). New requirements include:
  - Rig and equipment movement reports
  - **Real-time monitoring**
    - BSEE approved verification organizations
  - Revised BOP requirements including:
    - Design and manufacture/quality assurance
    - Accumulator system capabilities and calculations
    - BOP and remotely operated vehicle capabilities
    - Testing, maintenance, and inspection including third-party verification
    - Increased submittals to BSEE