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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR FALSE STATEMENTS

UNITED STATES OF AMERICA

vs.

RACE ADDINGTON

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CRIMINAL NO:

SECTION:

VIOLATION: 18 U.S.C. § 1001

15-13
SECT. C MAG. 2

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. On or about November 27, 2012, the defendant, **RACE ADDINGTON**, was serving as a well site supervisor on an offshore oil and gas platform located at Ship Shoal 225 located on a federal mineral lease in the Gulf of Mexico in the territorial jurisdiction of Louisiana.

2. On or about November 27, 2012, production and well workover operations were being conducted on the platform and the blowout preventer system had to be tested. A blowout preventer system is designed to ensure well control and prevent potential release of oil and gas and possible loss of well control. According to the Code of Federal Regulations, the blowout

preventer system must be pressure tested at regular intervals, and the entire system must pass the pressure tests prior to re-commencing with operations. According to the Code of Federal Regulations, the results of the pressure testing, including any problems or irregularities observed during the testing and the actions taken to remedy the problems, must be recorded. According to the Code of Federal Regulations, the blowout preventer test record and pressure chart must be signed and dated by the onsite representative as correct. The blowout preventer pressure chart that recorded the testing of the blowout preventer testing done on November 27, only recorded 6 of the 7 required components as being tested and was not signed nor dated by any representative on the platform.

3. On or about November 28, 2012, the defendant, **RACE ADDINGTON**, saw the results of the blowout preventer testing and the pressure chart and directed two contract workers to create replica blowout preventer charts using a small pump hooked directly into a chart recorder to make what he believed appeared to be seven passing pressure tests. The chart was labeled BOP test chart and dated 11/27/2012.

4. On or about November 29, 2012, inspectors with the United States Department of the Interior's Bureau of Safety and Environmental Enforcement (BSEE) came onboard the platform at Ship Shoal 225 for a routine inspection and requested blowout preventer testing records. The defendant, **RACE ADDINGTON**, gave the inspectors the replica chart believing that the pressure chart would mislead the inspectors into believing that the blowout preventer had been tested and the components passed the pressure tests. The replica chart did not show passing tests.

5. On or about December 6, 2012, an investigation into the veracity of the test chart the defendant, **RACE ADDINGTON**, provided to inspectors was initiated by the United States

Department of the Interior's Investigations and Review Unit.

B. FALSE STATEMENT

On or about November 29, 2012, in the Eastern District of Louisiana, in a matter within the jurisdiction of the United States Department of the Interior's Bureau of Safety and Environmental Enforcement, a department and agency of the United States, the defendant, **RACE ADDINGTON**, did knowingly and willfully make and cause to be made material statements and representations that were false, fictitious, and fraudulent, in that the defendant, **RACE ADDINGTON**, presented a fabricated blowout preventer pressure test chart to BSEE inspectors that he knew was not the actual blowout preventer pressure chart with the expectation that it would be a passing test and the inspectors would not find the platform to be in non-compliance for failing to properly test the blowout preventer system; all in violation of Title 18, United States Code, Section 1001.

COUNT 2

A. The allegations contained in Paragraph A of Count 1 of this Bill of Information, as set forth above, are realleged and incorporated by reference as though set forth in their entirety herein.

B. FALSE STATEMENT

On or about December 6, 2012, in the Eastern District of Louisiana, in a matter within the jurisdiction of the United States Department of the Interior's Investigations and Review Unit, a department and agency of the United States, the defendant, **RACE ADDINGTON**, did knowingly and willfully make and cause to be made material statements and representations that were false, fictitious, and fraudulent, in that the defendant, **RACE ADDINGTON**, told investigators asking about the creation and presentation of the blowout

preventer pressure test chart to BSEE inspectors on November 29, 2012, that he was having the chart recorder on the platform tested and that the inspectors mistakenly retrieved the wrong pressure chart from the files when in truth and in fact he knew that he had the blowout preventer pressure test chart fabricated and personally presented the chart to inspectors as the actual test record for the platform's blowout preventer system; all in violation of Title 18, United States Code, Section 1001.

RICHARD WESTLING.
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New Orleans, Louisiana
January 26, 2015