



U. S. Chemical Safety and Hazard Investigation Board RECOMMENDATION STATUS CHANGE SUMMARY

Report:	Pryor Trust Fatal Gas Well Blowout and Fire
Recommendation Number:	2018-01-I-OK-R1
Date Issued:	June 12, 2019
Recipient:	Occupational Safety and Health Administration
New Status:	Closed – Reconsidered/Superseded <i>(Superseded by 2020-04-I-TX-R4)</i>
Date of Status Change:	December 21, 2023

Recommendation Text:

Implement one of the three following options regarding regulatory changes:

- (a) OPTION 1: Apply the Process Safety Management (PSM) standard (29 CFR 1910.119) to the drilling of oil and gas wells; or*
- (b) OPTION 2: Apply the Process Safety Management (PSM) standard (29 CFR 1910.119) to the drilling of oil and gas wells as in OPTION 1, and make the necessary modifications to customize it to oil and gas drilling operations; or*
- (c) OPTION 3: Develop a new standard with a safety management system framework similar to PSM that applies only to the drilling of onshore oil and gas wells that includes but is not limited to the following:*
 - 1. Detailed written operating procedures with specified steps and equipment alignment for all operations;*
 - 2. Written procedures for the management of changes (except replacements in kind) in procedures, the well plan, and equipment;*
 - 3. A risk assessment of hazards associated with the drilling plan;*
 - 4. A requirement to follow Recognized and Generally Accepted Good Engineering Practices (RAGAGEP);*
 - 5. Development of a Well Construction Interface Document between the operator and the drilling contractor prior to the commencement of drilling activities which at a minimum includes a bridging document and well plan specifying barriers and how to manage them;*
 - 6. The performance and documentation of flow checks using acceptable methods at defined points during the operation for a specified duration; and*
 - 7. A requirement for employee participation, similar to the Employee Participation requirement in the OSHA PSM standard.*

Board Status Change Decision:

A. Rationale for Recommendation

On January 22, 2018, a blowout and rig fire occurred at Pryor Trust 0718 gas well number 1H-9, located in Pittsburg County, Oklahoma. The fire killed five workers, who were inside the driller's cabin on the rig floor. They died from thermal burn injuries and smoke and soot inhalation. The blowout occurred about three-and-a-half hours after removing drill pipe ("tripping") out of the well.

The cause of the blowout and rig fire was the failure of both the primary barrier—hydrostatic pressure produced by drilling mud—and the secondary barrier—human detection of influx and activation of the blowout preventer—which were intended to be in place to prevent a blowout.

B. Response to the Recommendation

On July 29, 2019, OSHA sent the CSB a letter detailing their rulemaking efforts to consider expanding the scope of the Process Safety Management of Highly Hazardous Chemicals (PSM) standard (29 CFR 1910.119) to include oil well drilling. At that time, OSHA had issued a Request for Information (RFI) and completed a Small Business Regulatory Flexibility Review Act (SBREFA) panel. All these actions were completed prior to the issuance of the recommendation. PSM rulemaking was listed as a "long term action" on OSHA's regulatory agenda at that time. On October 12, 2022, OSHA held a stakeholder meeting to discuss the changes proposed in the rulemaking. As of the date of this status change, PSM rulemaking is listed as being in the "Prerule Stage." No other rulemaking addressing this recommendation is pending.

This recommendation was superseded by CSB Recommendation No. 2020-04-I-TX-R4, a new, more appropriate recommendations from the CSB's [Wendland 1H Well Fatal Explosion \(2023\)](#).

C. Board Analysis and Decision

CSB policy allows a recommendation to be superseded when it is replaced by a new more appropriate recommendation to the same recipient and covering the same or similar issues. CSB Recommendation No. 2018-01-I-OK-R1 directed OSHA to issue a standard addressing safety and health on oil well drilling sites by either expanding the scope of the PSM standard to cover them or developing a new standard. The new recommendation covers oil well drilling as well as oil well servicing. CSB Recommendation No. 2017-04-I-WI-R10 is a more appropriate recommendation because if implemented will result in a standard providing more comprehensive protection than envisioned by the previous recommendation.

Based upon the information above, the Board voted to change CSB Recommendation No. 2018-01-I-OK-R1 to: "Closed – Reconsidered/Superseded."