



U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To: Board Members

From: Steven Messer
Acting General Counsel

STEVEN
MESSER

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STEVEN MESSER
Date: 2025.12.05
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Cc: Charles Barbee
Adam Henson
Leadership Team

Subject: Board Action Report – Notation Item 2026-08 | Recommendation to Aghorn Operating Inc. (2020-01-I-TX-R7) from the Aghorn Operating Inc. Waterflood Station Hydrogen Sulfide Release investigation (2020-01-I-TX)

Date: December 5, 2025

On December 4, 2025, the Board approved Notation Item 2026-08, thereby designating Recommendation 2020-01-I-TX-R7 from the Aghorn Operating Inc. Waterflood Station Hydrogen Sulfide Release investigation (2020-01-I-TX) with the status of Closed – Acceptable Action.

Voting Summary – Notation Item 2026-08

Disposition: APPROVED

Disposition date: December 4, 2025

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				12/4/2025
S. Owens	X				12/4/2025



U. S. Chemical Safety and Hazard Investigation Board

RECOMMENDATION STATUS CHANGE

SUMMARY

Report:	Aghorn Operating Inc. Waterflood Station Hydrogen Sulfide Release
Recommendation Number:	2020-01-I-TX-R7
Date Issued:	May 21, 2021
Recipient:	Aghorn Operating Inc.
New Status:	Closed – Acceptable Action
Date of Status Change:	December 4, 2025

Recommendation Text:

For all waterflood stations where the potential exists to expose non-employees to H₂S concentrations at or above 10 ppm, develop and implement a formal, written, site-specific security program to prevent unknown and unplanned entrance of those not employed by Aghorn, starting with a requirement for employees to lock access gates upon entering and departing the facility.

Board Status Change Decision:

A. Rationale for Recommendation

On October 26, 2019, an Aghorn Operating Inc. (Aghorn) employee responded to a pump oil level alarm at Aghorn's Foster D waterflood station in Odessa, Texas. In response to the alarm the employee worked to isolate the pump. He closed the pump's discharge valve but only partially closed the pump's suction valve. At some point on the night of the incident, the pump automatically turned on and water containing hydrogen sulfide (H₂S), a toxic gas, was discharged from the pump. The employee was fatally injured from his exposure to the H₂S. Subsequently, the spouse of the employee gained access to the waterflood station and searched for her husband. During her search efforts, she was also exposed to the released H₂S and was fatally injured.

The U.S. Chemical Safety and Hazard Investigation Board (CSB) investigated the incident and found that the employee was not wearing his personal H₂S detection device and there was no evidence that Aghorn management required the use of these devices. The CSB also found that at the time of the incident, Aghorn did not have any written Lockout/Tagout policies, procedures, or associated training. As a result of these findings, the CSB issued seven recommendations to Aghorn. This status change summary addresses CSB Recommendation No. 2020-01-I-TX-R7.

B. Response to the Recommendation

Aghorn's initial and follow-up responses provided information that the recommendation was fully implemented. They provided a site security policy and installed perimeter fencing with

access gates at applicable waterflood stations that employees lock in accordance with their policy meeting all of the requirements of the recommendation.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change the status of CSB Recommendation No. 2020-01-I-TX-R7 to: "Closed – Acceptable Action."