For all waterflood stations where the potential exists to expose workers or non-employees within the perimeter of the facility to H2S concentrations at or above 10 ppm, develop and demonstrate the use of a safety management program that includes a focus on protecting workers and non-employees from H2S. This program should include risk identification, assessment, mitigation, and monitoring of design, procedures, maintenance and training related to H2S. This program must be in compliance with 29 CFR 1910.1000 – Air Contaminants and 29 CFR 1910.147 – The Control of Hazardous Energy (Lockout / Tagout).

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. Additionally, the CSB found that Aghorn’s safety management system was inadequate to protect their workers from the exposure to H2S. 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-R4.