

U.S. Chemical Safety and Hazard Investigation Board

OFFICE OF GENERAL COUNSEL

Memorandum

To:	Board Members
From:	Christopher M. Lyon Christopher M. Lyon Acting General Counsel
Cc:	Amanda Johnson Adam Henson Leadership Team
Subject:	Board Action Report – Notation Item 2024-66
Date:	April 9, 2024

On April 9, 2024, the Board approved Notation Item 2024-66, thereby designating Recommendation 2018-01-I-OK-R19, to the State of Oklahoma, from the Pryor Trust Fatal Gas Well Blowout and Fire investigation, 2018-01-I-OK, with the status of Open – Unacceptable Response/No Response Received.

Voting Summary – Notation Item 2024-66

Disposition: APPROVED

Disposition date: April 9, 2024

	Approve	Disapprove	Calendar	Not Participating	Date
S. Johnson	X				4/9/2024
S. Owens	X				4/9/2024
C. Sandoval	X				4/9/2024



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-R19
Date Issued:	July 12, 2019
Recipient:	State of Oklahoma
New Status:	Open - Unacceptable Response/No Response Received
Date of Status Change:	April 9, 2024

Recommendation Text:

Establish and implement safety regulations requiring entities who design oil and gas well drilling plans for wells in Oklahoma (e.g., operators) and entities who perform the drilling operation (e.g., drilling contractors) to develop and implement the following prior to conducting drilling operations:

- (a) Detailed written operating procedures with specified steps and equipment alignment for all operations;
- *(b)* Written procedures for the management of changes (except replacements in kind) in procedures, the well plan, and equipment;
- (c) A risk assessment of hazards associated with the drilling plan;
- (d) A requirement to follow Recognized and Generally Accepted Good Engineering Practices (RAGAGEP);
- (e) 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;
- (f) The performance and documentation of flow checks using acceptable methods at defined points during the operation for a specified duration; and
- (g) 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 ("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.

As a result of these findings, the CSB issued one recommendation to the State of Oklahoma. This status change summary addresses CSB Recommendation No. 2018-01-I-OK-R19.

B. <u>Response to the Recommendation</u>

The State of Oklahoma has notified the CSB that they do not intend to implement the recommendation. Additionally, they have neither proposed an alternate course of action for risk reduction, nor provided a rationale for not implementing the recommendation that the Board agrees with.

C. Board Analysis and Decision

Based upon the information above, the Board voted to change CSB Recommendation No. 2018-01-I-OK-R19 to: "Open – Unacceptable Response/No Response Received."