

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

UNITED STATES OF AMERICA,

v.

AGHORN OPERATING, INC. (1),
TRENT DAY (2), and
KODIAK ROUSTABOUT, INC. (3)

Defendants.

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CRIMINAL NO. 7:22-CR-49

**NOTICE OF IMPROVEMENTS
TO AGHORN FACILITIES AND OPERATIONS**

Aghorn Operating, Inc., has made substantial improvements to its facilities and operations since October 2019. Aghorn Operating, Inc., Trent Day, and Kodiak Roustabout, Inc., file this notice, highlighting examples of those safety enhancements. The United States has no opposition to the filing of this Notice with the Court.

I. Facility Improvements

A. Foster D Water Flood Station

Before October 2019, the Section 8 (Foster D) water flood station was an enclosed metal building, housing oilfield pumps. To increase ventilation, Aghorn removed several feet of the station's exterior walls from the ground up and replaced the metal walls with chain link fence:



B. Gist Unit Water Flood Station

Aghorn made similar modifications to the Gist Unit water flood station which also houses oilfield pumps:





C. Stationary H₂S Monitors

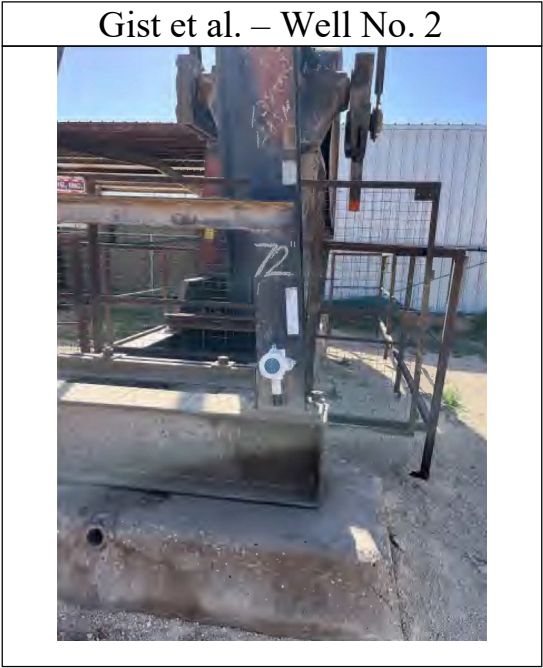
Aghorn also upgraded, installed and, with the assistance of third-party vendors, regularly maintains stationary H₂S monitors at the following oil production facilities:

1. Section 8 (Foster D) water flood station
2. Foster D battery
3. Foster C battery
4. Gist Unit water flood station
5. Gist Unit central battery
6. Gist Unit satellite battery 1
7. Gist Unit satellite battery 2
8. Gist Unit satellite battery 3
9. Gist Unit satellite battery 4
10. Gist Unit satellite battery 5
11. Gist Unit satellite battery 6
12. Gist Unit satellite battery 14
13. Gist Unit well no. 19
14. Gist Unit well no. 42
15. Gist Unit well no. 83
16. Gist Unit well no. 101
17. Gist Unit well no. 137
18. Gist Unit well no. 149
19. East Harper Unit central battery
20. Cowden 13G battery
21. Cowden 14G battery
22. Emmons Unit injection station
23. Moss Unit central battery
24. Moss Ranch 44 battery and flare
25. Gist A battery
26. Gist A well no. 9
27. Gist B and C battery
28. Gist et al. battery
29. Gist et al. well no. 1
30. Gist et al. well no. 2

31. Gist et al. well no. 4
32. Gist et al. well no. 5
33. Gist et al. well no. 6
34. Foster Johnson Unit satellite battery 3
35. Foster Johnson Unit satellite battery 17
36. J.E. Bagley battery

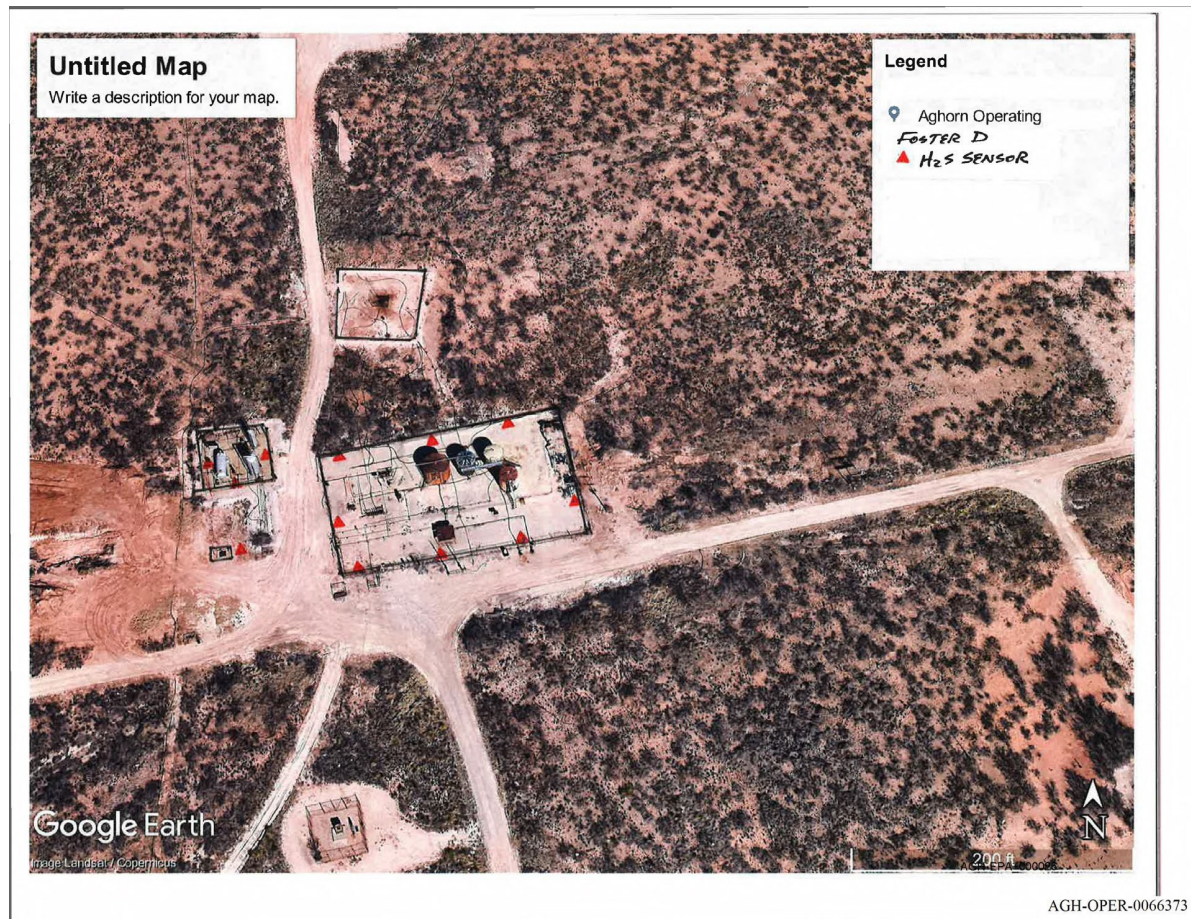
Here are examples of H2S monitors that have been added to the facilities listed above:

Foster Johnson Unit – Sat. 3	Gist Unit – Well No. 137
	

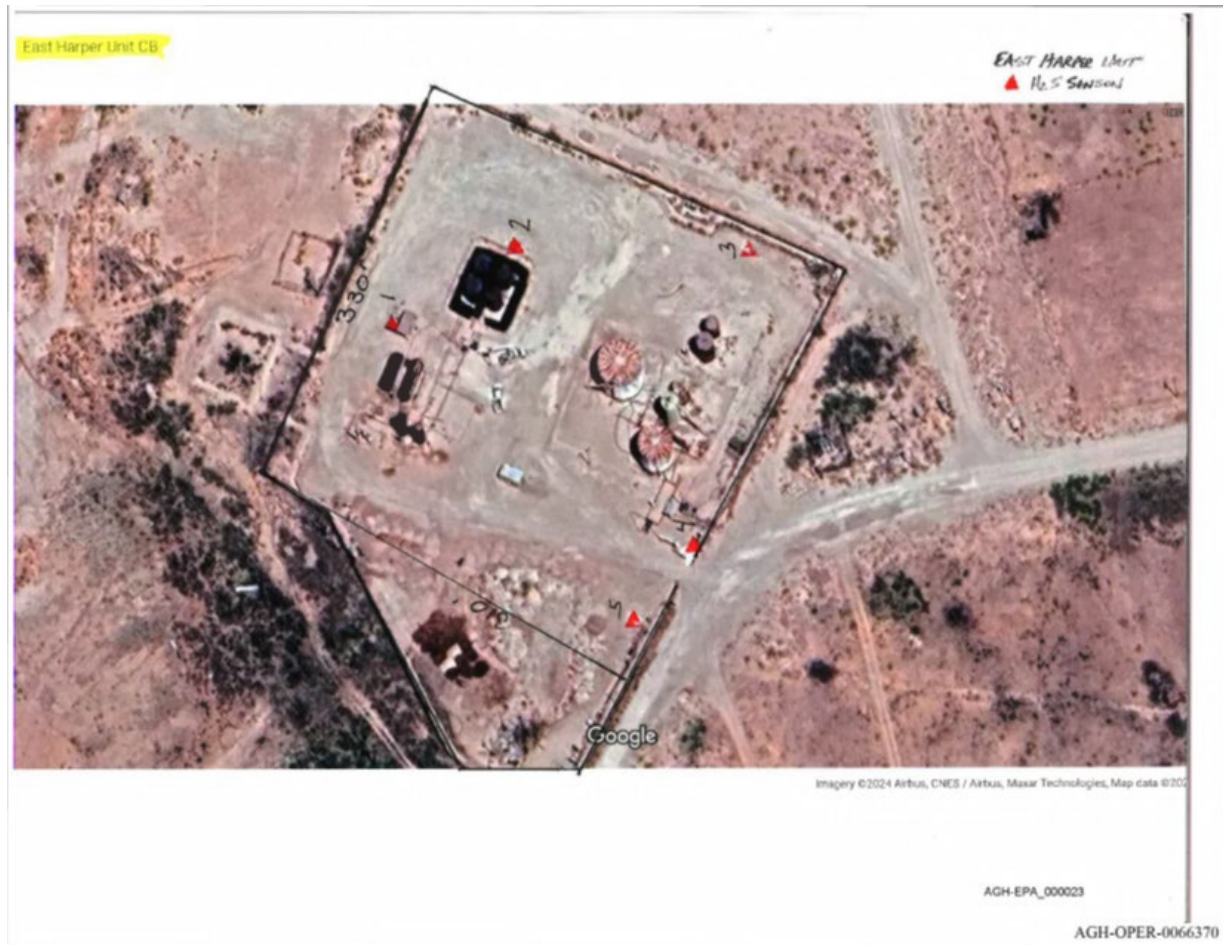


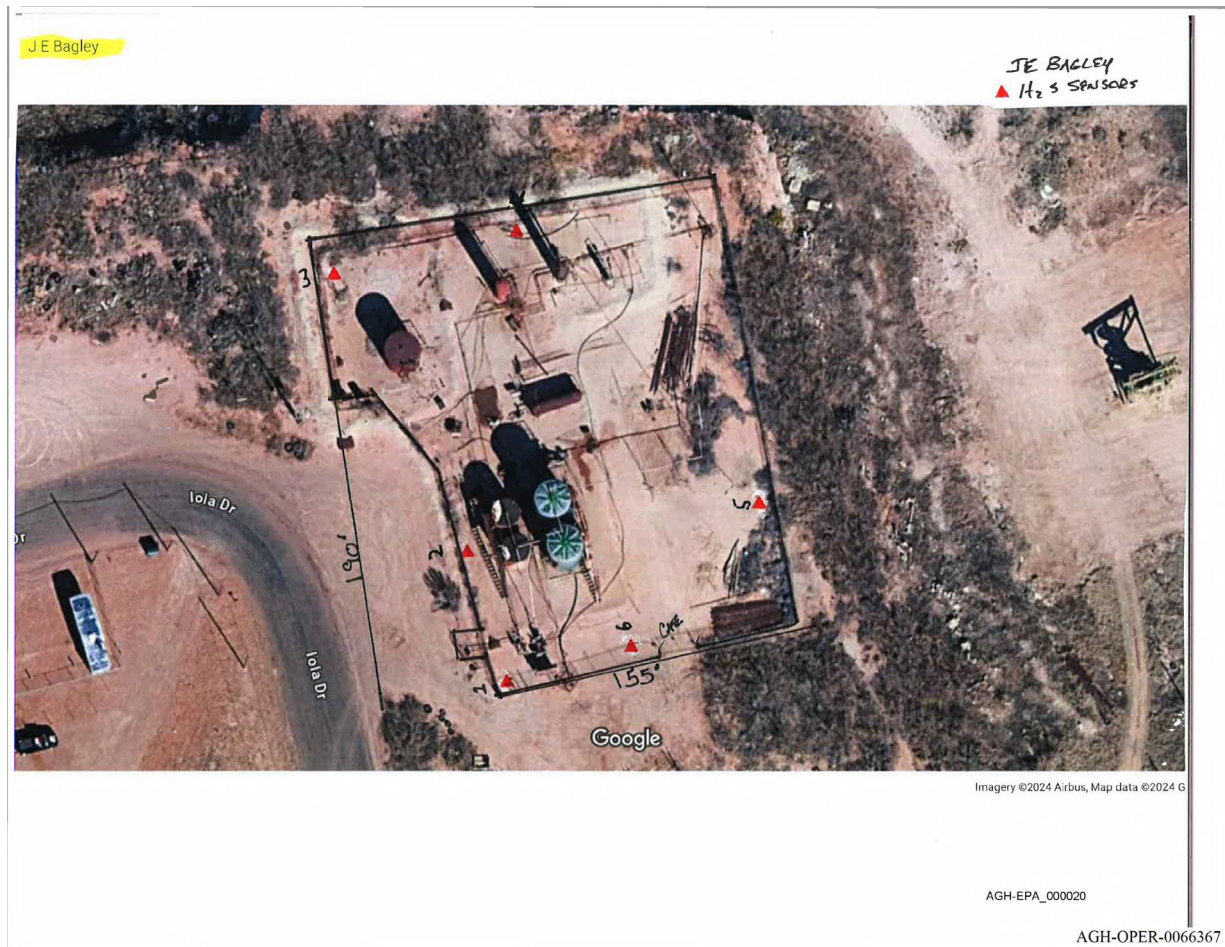
Multiple monitors were installed at many of the listed sites. Here are some examples (red triangles mark the monitors):

Foster D Battery



East Harper Unit Central Battery



J.E. Bagley Battery

If a stationary monitor at one of these facilities detects an unsafe level of H₂S, a call-out system notifies an Aghorn employee—on duty 24/7—to acknowledge the alarm and investigate and properly assess the situation. Aghorn has also upgraded many of the alarm and communication systems associated with these H₂S monitors. At some of the more sensitive locations, these monitors are connected to systems housed and maintained by third parties that will not only notify Aghorn personnel if unsafe levels of H₂S are detected, but also allow for remote, real-time monitoring of H₂S levels via computer and mobile phone applications.

D. Warning Signs, Fencing and Cameras

Aghorn updated and added signs at facility entrances warning about the presence of H₂S and other dangers. The company also repaired and enhanced perimeter fencing and installed cameras for remote monitoring.

II. Operational Improvements

Aghorn hired a full-time safety manager to direct in-house training and compliance and site safety. Aghorn has established written safety policies, including a written respiratory policy. It conducts annual third-party H₂S safety training for employees (and other safety training during the year). It also retained third-party vendors to develop site-specific contingency plans for H₂S emergencies.

III. Summary

Since October 2019, Aghorn has substantially improved the safety of its facilities and instituted measures to ensure the safety of its employees and the general public.

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

The parties conferred regarding the filing of this notice, and the United States has no opposition to its filing.

/s/ David Gerger
David Gerger

CERTIFICATE OF SERVICE

I filed this pleading in the Court's electronic filing system which sends notice to all parties.

/s/ David Gerger
David Gerger