

Jason E. Thron

From: Jason E. Thron
Sent: Monday, October 17, 2016 3:41 PM
To: Jason E. Thron
Subject: FW: Spaur Well Pad Form 22

From: Adell K. Heneghan
Sent: Monday, October 17, 2016 6:42 AM
To: 'mike.leonard@state.co.us'
Cc: 'margaret.ash@state.co.us'; 'dave.kulmann@state.co.us'
Subject: Spaur Well Pad Form 22

Good morning Mike.

I was forwarded your reply and initial approval to PDC's submittal of a Form 22 for the September 27, 2016 incident that occurred on the Spaur West Facility. I am writing to you today to comply with your COA's regarding that approval and to ask for clarification on another.

First, please find attached the investigation report from Randolph Harris, Fay Engineering. As background, I have pasted Mr. Harris' brief bio. Mr. Harris was recommended to us by Travelers Insurance.

Randolph J. Harris B.S. Ch.E., Certified Vehicle Fire Investigator, Certified Fire & Explosion Investigator, Certified Propane Handler, Certified Chimney Inspector, has been a fire expert for 31 years and has investigated over 500 truck, heavy equipment and vehicle fires. He has investigated over 2,500 incidents, including residential & commercial structure fires, refineries, gas explosions and carbon monoxide poisonings. He has testified in court over 80 times. His success is based on his engineering education, experience, inherent knowledge, understandability, integrity and superior analytical skills. Mr. Harris can dig through the debris, properly question witnesses, conduct the lab testing and research, write a understandable report, manage displays and tell the story clearly in court.
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Second, as recommended in Mr. Harris' report, PDC has provided all employees with a bonding strap, discontinued use of any plastic drip catch basins in separators, discontinued usage of any plastic handles on buckets, and implemented procedures to de-energize any electrical components. In addition, each employee has been assigned mandatory training regarding static hazards, bonding and grounding and electrical hazards, with additional in person training regarding bonding during flammable liquid transfers scheduled for October 25 and 27, 2016. .

Finally, your correspondence referenced preventing future occurrences. PDC conducts full investigations and causal analysis of each environmental health and safety incident, regardless of size or reporting requirements. Our incident review committee consists of employees from all walks – EHS professionals, Pumpers, Supervisors, Construction, Drilling and Completions, and Management. Our committee meets on a monthly basis, or more often as warranted, to review each incident, discuss the incident investigation, determine potential causes, and establish appropriate corrective actions. The goal of all incident reviews are to understand the circumstances and causes of the incident and to determine an appropriate engineered control solution, process change, human factor or limitation, or training solution. PDC recognizes that the oil and gas industry, like many industries, involve several different risks. PDC works to continually recognize hazards and improve conditions to control hazards, often well before any incident occurs. For example, in the prevention of

fires, we require hot work permits, Personal Protective Equipment that includes Flame Resistant Clothing and personal gas monitors, no smoking requirements at work sites, intrinsically safe electronic equipment requirements, readily available fire extinguishers, ongoing employee training, parking vehicles with catalytic converters away from the immediate well and production equipment vicinity, and many other pre-emption actions. PDC regularly and routinely trains employees on hazards, fire prevention, incipient fire suppression, and job safety hazard assessment. It is not feasible to state that the actions taken, equipment or training provided will unequivocally prevent all future occurrences of any incident; however, PDC is committed to providing our employees and the community a safe and healthy environment, by learning from incidents and industry advancements, immediately taking action when situations do arise, and continually reviewing our work procedures and training materials. These actions do not insure no future incidents, rather, they address recurrence of the root causes of an incident. In that frame, can you please advise how you would like for PDC to respond to the final COA – “to prevent future occurrences”?

Thank you. If you have any questions regarding the investigator’s report, PDC actions taken, or our incident review process, please do not hesitate to contact me or Jason Thron,



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***It takes less time to do a thing right, than it does to explain why you did it wrong.
~ Henry Wadsworth Longfellow ~***