

## U.S. Department of Labor

Occupational Safety and Health Administration  
ROOM 806, GEORGE MAHON FEDERAL BUILDING  
1205 TEXAS AVENUE  
LUBBOCK, TX 79401-4039  
Phone: (806)472-7681 FAX: (806)472-7686



### Citation and Notification of Penalty

**To:**  
Robinson Drilling of Texas, LTD.

**Inspection Number:** 315116137  
**Inspection Date(s):** 04/06/2011 - 04/06/2011

and its successors  
1200 N. FM 700  
Big Spring, TX 79720

**Issuance Date:** 09/28/2011

**Inspection Site:**  
Rig 20, Gaskins, Well # 1  
1.3 miles East from Lenorah,, TX 79749

*The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.*

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty you mail a notice of contest to the U.S. Department of Labor District Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

**Posting** - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

**Informal Conference** - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the page 4 Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

**Right to Contest** - You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.

**Penalty Payment** - Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to "DOL-OSHA". Please indicate the Inspection Number on the remittance.

OSHA does not agree to any restrictions or conditions or endorsements put on any check or money order for less than the full amount due, and will cash the check or money order as if these restrictions, conditions, or endorsements do not exist.

**Notification of Corrective Action** - For violations which you do not contest, you should notify the U.S. Department of Labor District Office promptly by letter that you have taken appropriate corrective action within the time frame set forth on this Citation. Please inform the District Office in writing of the abatement steps you have taken and of their dates, together with adequate supporting documentation, e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results, etc. (Please see attached "Corrective Action Verification.")

**Employer Discrimination Unlawful** - The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor District Office at the address shown above.

**Employer Rights and Responsibilities** - The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

**Notice to Employees** - The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor District Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.



## NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on \_\_\_\_\_ 09/28/2011. The conference will be held at the OSHA office located at ROOM 806, GEORGE MAHON FEDERAL BUILDING, 1205 TEXAS AVENUE, LUBBOCK, TX, 79401-4039 on \_\_\_\_\_ at \_\_\_\_\_. Employees and/or representatives of employees have a right to attend an informal conference.



**Citation and Notification of Penalty**

Company Name: Robinson Drilling of Texas, LTD.  
Inspection Site: Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah,, TX

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**Citation 1 Item 1** Type of Violation: **Serious**

29 CFR 1910.23(a)(5): Infrequently used pit or trap door floor opening(s) were not guarded by floor opening covers of standard strength and construction:

On or About April 6, 2011 and at times prior thereto; a floor opening located on the south side of the Mud Pit Platform measuring approximately 17 feet 4 inches X 14 inches did not have standard railing, standard toeboards or floor opening covers installed to protect employees from accidently falling through.

Date By Which Violation Must be Abated: 09/28/2011  
Proposed Penalty: \$ 4400.00

**Citation 1 Item 2** Type of Violation: **Serious**

29 CFR 1910.24(f): Fixed stairs did not have uniform rise height and tread width throughout the flight of stairs:

On or about April 6, 2011 and at times prior thereto; metal stairs located at the pre-mixing area did not have uniform rise height and tread width throughout the flight of stairs. The first and seventh stair were broken; the third, fourth, fifth and tenth stair were damaged.

Date By Which Violation Must be Abated: 09/28/2011  
Proposed Penalty: \$ 3300.00

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See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



**Citation and Notification of Penalty**

Company Name: Robinson Drilling of Texas, LTD.  
Inspection Site: Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah,, TX

**Citation 1 Item 3 Type of Violation: **Serious****

29 CFR 1910.176(c): Storage areas were not kept free from accumulation of materials that constituted hazards from tripping, fire, explosion or pest harborage:

On or about April 6, 2011 and at times prior thereto; designated location of the storage site was behind the fuel tank on the west side of the site. The accumulation of hazardous materials constituted hazards from tripping, fire, explosion, or pest harborage.

Date By Which Violation Must be Abated: 09/28/2011  
Proposed Penalty: \$ 3300.00

**Citation 1 Item 4 Type of Violation: **Serious****

29 CFR 1910.212(a)(1): One or more methods of machine guarding were not provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and/or sparks:

On or about April 6, 2011 and at times prior thereto; two instances where horizontal reciprocating piston/plunger shafts were left unguarded:

- a) Mud pump #1 had one broken guard (approximately 18 inches x 12 inches) on the left side exposing machine rod.
- b) Mud Pump #2 had two guards (approximately 6 inches x 12 inches and 18 Inches x 12 inches) missing on the right side and one guard (approximately 6 inches x 12 inches) missing on the left side exposing the machine rod.

Date By Which Violation Must be Abated: 09/28/2011  
Proposed Penalty: \$ 4400.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



**Citation and Notification of Penalty**

Company Name: Robinson Drilling of Texas, LTD.  
Inspection Site: Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah., TX

**Citation 1 Item 5 Type of Violation: **Serious****

29 CFR 1910.219(d)(1): Pulley(s) with part(s) seven feet or less from the floor or work platform were not guarded in accordance with the requirements specified in 29 CFR 1910.219(m) and (o):

On or about April 6, 2011 and at times prior thereto; two instances where machine pulleys were left unguarded and positioned such that loose clothing or material could get caught up in it and pull employees into the pinch-points.

a) Located on the NW corner of the site, diesel powered generators #1 & #2 (which supplies power to the mud pumps) had missing pulley guards.

b) Located on the rig floor diesel powered generators #1 & #2 (which supply power to the drill rig) had missing pulley guards.

Date By Which Violation Must be Abated: 09/29/2011  
Proposed Penalty: \$ 4400.00

**Citation 1 Item 6 Type of Violation: **Serious****

29 CFR 1910.305(b)(2)(i): Each outlet box in completed installations did not have a cover, faceplate, or fixture canopy:

On or about April 6, 2011 and at times prior thereto; located to the right as you enter the Bottom Dog House an outlet receptacle was missing a faceplate as a result; the receptacle's live conductors were left exposed.

Date By Which Violation Must be Abated: 09/28/2011  
Proposed Penalty: \$ 6600.00

**U.S. Department of Labor**  
Occupational Safety and Health Administration

**Inspection Number:** 315116137  
**Inspection Dates:** 04/06/2011 - 04/06/2011  
**Issuance Date:** 09/28/2011



**Citation and Notification of Penalty**

**Company Name:** Robinson Drilling of Texas, LTD.  
**Inspection Site:** Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah., TX

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**Citation 1 Item 7 Type of Violation: **Serious****

29 CFR 1910.305(g)(2)(ii): Flexible cords were not used in continuous lengths without splice or tap:

Splicing of electrical wiring was found at two separate locations.

a) Location, the water tank which supplies electricity to the pump.

b) Location, the mud pit platform supplying electricity to one of the lighting fixtures.

**Date By Which Violation Must be Abated:** 09/28/2011  
**Proposed Penalty:** \$ 5500.00

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See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



**Citation and Notification of Penalty**

**Company Name:** Robinson Drilling of Texas, LTD.  
**Inspection Site:** Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah,, TX

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**Citation 2 Item 1 Type of Violation: Repeat**

29 CFR 1910.151(c): Where employees were exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate emergency use:

On or about April 6, and at times prior thereto; Three Eyewash/shower stations were not in operation:

- a) The Bradley Combination Drench Shower & Eye/Face Wash Unit located at the NW corner of the site was not operational.
- b) The eyewash station up top the mud pit platform was not operational.
- c) The bottled eyewash station used as a supplemental resource located approximately 25-30 ft. from the Bradley eyewash station was not properly marked or identified as such.

Robinson Drilling of Texas Ltd. was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.151(c) which was contained in OSHA inspection number 312238728, citation number 02, item 001 and was affirmed as a final order on December 1, 2008, with respect to a workplace located at 9 Miles Hwy. 58, Garden City, TX 79739.

Date By Which Violation Must be Abated: 09/28/2011  
Proposed Penalty: \$ 22000.00



**Citation and Notification of Penalty**

**Company Name:** Robinson Drilling of Texas, LTD.  
**Inspection Site:** Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah,, TX

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**Citation 2 Item 2 Type of Violation: Repeat**

29 CFR 1910.157(c)(4): Portable fire extinguishers were not maintained in a fully charged and operable condition:

On or about April 6, 2011 and at times prior thereto; three fire extinguishers were not fully charged; employees were expected to use the fire extinguishers in the event of a small fire.

- a) Fire extinguisher located in front of the Tool Pusher/Rig Manager trailer was not fully charged.
- b) Fire extinguisher located on the SW corner of the rig site was not fully charged.
- c) Fire extinguisher located in front of the fuel pit was not fully charged.

Robinson Drilling of Texas Ltd. was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.157(c)(4) which was contained in OSHA inspection number 309758092, citation number 01, item 001 and was affirmed as a final order on August 31, 2007, with respect to a workplace located at Rig #10, Rocker B Ranch, Barnhart, TX 76930.

**Date By Which Violation Must be Abated:** 09/28/2011  
**Proposed Penalty:** \$ 22000.00

**U.S. Department of Labor**  
Occupational Safety and Health Administration

**Inspection Number:** 315116137  
**Inspection Dates:** 04/06/2011 - 04/06/2011  
**Issuance Date:** 09/28/2011



**Citation and Notification of Penalty**

**Company Name:** Robinson Drilling of Texas, LTD.  
**Inspection Site:** Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah., TX

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**Citation 2 Item 3 Type of Violation: Repeat**

29 CFR 1910.304(g)(5): The path to ground from circuits, equipment, and enclosures was not permanent and continuous:

On or about April 6, 2011 and at times prior thereto; Two instances on the site where the path to ground from circuits, equipment and enclosures was not permanent and continuous.

a) Grounding rod located outside the Tool Pusher/Rig Manager's trailer was not installed and/or grounded properly.

b) Grounding rod located in front of the oil bin was not installed and/or grounded properly.

Robinson Drilling of Texas Ltd. was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.304(g)(5) which was contained in OSHA inspection number 312155708, citation number 01, item 005 and was affirmed as a final order on November 13, 2008, with respect to a workplace located at 5 miles N of Lamesa, Hwy 87, Nirvana Lease, Well #2, Lamesa, TX 79331.

**Date By Which Violation Must be Abated:** 09/28/2011  
**Proposed Penalty:** \$ 27500.00

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See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor  
Occupational Safety and Health Administration

Inspection Number: 315116137  
Inspection Dates: 04/06/2011 - 04/06/2011  
Issuance Date: 09/28/2011



**Citation and Notification of Penalty**

Company Name: Robinson Drilling of Texas, LTD.  
Inspection Site: Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah,, TX

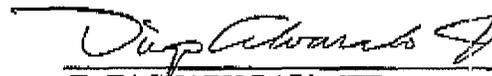
**Citation 2 Item 4 Type of Violation: Repeat**

29 CFR 1910.305(b)(1)(ii): Unused openings in cabinets, boxes, and fittings shall be effectively closed:

On or about April 6, 2011 and at times prior thereto; inside the generator house an electrical panel and a voltage meter panel had unused/openings that were not effectively closed.

Robinson Drilling of Texas Ltd. was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.305(b)(1)(ii) which was contained in OSHA inspection number 312155708, citation number 01, Item 006b and was affirmed as a final order on November 13, 2008, with respect to a workplace located at 5 miles N of Lamesa, Hwy 87, Nirvana Lease, Well #2, Lamesa, TX 79331.

Date By Which Violation Must be Abated: 09/28/2011  
Proposed Penalty: \$ 27500.00

  
F. ZACHARY BARNETT  
Area Director

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

**U.S. Department of Labor**  
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## INVOICE/ DEBT COLLECTION NOTICE

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**Company Name:** Robinson Drilling of Texas, LTD.  
**Inspection Site:** Rig 20, Gaskins, Well # 1, 1.3 miles East from Lenorah., TX 79749  
**Issuance Date:** 09/28/2011

**Summary of Penalties for Inspection Number 315116137**

<b>Citation 1, Serious</b>	= \$	<b>31900.00</b>
<b>Citation 2, Repeat</b>	= \$	<b>99000.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	= \$	<b>130900.00</b>

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To avoid additional charges, please remit payment promptly to this District Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to:  
"DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance.

OSHA does not agree to any restrictions or conditions put on any check or money order for less than the full amount due and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

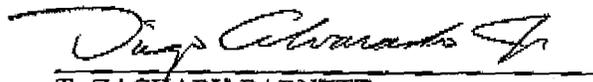
Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

**Interest.** Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is 1%. Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you

file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

**Delinquent Charges.** A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

**Administrative Costs.** Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.

  
T. ZACHARY BARNETT  
Area Director

9/28/11  
Date