

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: 315277541
Inspection Date(s): 06/11/2011 - 06/15/2011

and its successors
607 S. Main
Big Spring, TX 79720

Issuance Date: 11/07/2011

Inspection Site:
Rig 3, Truitt Woods #1
Lamesa, TX 79331

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.

Corrective Action Verification

Reference:

Inspection Number:

Dear Sir:

OSHA's inspections are intended to result in the abatement/correction of violations of the OSHA Act. To verify that this has been accomplished, Section 1903.19 requires that an employer certify to OSHA, within ten (10) days of the final abatement date that each item cited has been corrected.

This abatement certification letter must include the following:

Name of Employer

OSHA Inspection Number

Citation and Item Numbers to which the submission relates

The date each item was abated, specific action taken to abate each violation and appropriate documentation for the action taken. Where appropriate, this documentation should include photographs, work orders, purchase orders, personal protective equipment provided, standard operation procedures, copies of written programs, engineering controls, monitoring data, etc. Adequate supporting documentation may allow us to close the case file. **The lack of adequate documentation could result in a follow-up inspection.**

A statement that affected employees and their representatives have been informed of the abatement actions

A statement that the information submitted is accurate

The signature of the employer or the employer's authorized representative.

Following is a sample format that may be used for this submittal:

Name of Employer _____

<u>Citation Number</u>	<u>Item No. Instance No.</u>	<u>Date Item Abated</u>	<u>Corrective Action Taken</u>
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Date this letter of submission posted _____

I certify that the information submitted is correct.

Employer or Authorized Representative



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on _____ 11/07/2011. 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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 1 Item 1 Type of Violation: Serious

Section 5(a)(1) of the Occupational Safety and Health Act of 1970: The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to the condition(s) listed below:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, the kelly bushing was worn, allowing it to 'stick' to the drill stem, causing struck-by injuries.

According to Recommended Practice for Occupational Safety for Oil and Gas Well Drilling and Servicing Operations, API Recommended Practice 54, Third Edition, August 1999, Reaffirmed, March 2007, page 19, section 9.8.3 states "The kelly bushing shall be of smooth design to prevent catching or snagging of personnel, clothing, or material."

Feasible and acceptable abatement methods would include:

- a. Regularly inspect the kelly bushing for defects and document the results of the inspections and maintenance / repairs if needed.
- b. Train employees of the dangers associated with a kelly bushing that is not smooth.

Date By Which Violation Must be Abated: 11/16/2011
Proposed Penalty: \$ 7000.00

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 3, Truitt Woods #1, Lamesa, TX 79331

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

29 CFR 1910.22(b)(1): Aisle(s) or passageway(s) were not kept clear and in good repair, with no obstruction across or in aisle(s) or passageway(s) that could create a hazard.

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, the employer did not maintain passageways in good repair in that the drain pipes between the mud tanks and unloading basins were insecurely propped up by using wooden pallets.

Date By Which Violation Must be Abated: 11/16/2011
Proposed Penalty: \$ 7000.00

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

29 CFR 1910.23(a)(8): Floor hole(s), into which persons could accidentally walk, were not guarded by standard railings with standard toeboards on all exposed sides or by floor hole covers of standard strength and construction:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, a floor hole measuring 4- by 8-inches on the mud pit was not protected.

Date By Which Violation Must be Abated: 11/16/2011
Proposed Penalty: \$ 5500.00

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 3, Truitt Woods #1, Lamesa, TX 79331

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

29 CFR 1910.134(h)(3)(iii): Self-contained breathing apparatus was not maintained in a fully charged state and was not recharged when the pressure fell below 90% of the manufacturer's recommended pressure level:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, the company did not ensure self-contained breathing apparatus (SCBAs) were maintained in a fully charged condition.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 5500.00

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

29 CFR 1910.141(a)(3)(ii): Floor(s) of workroom(s) were not maintained, so far as practicable, in a dry condition:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, the walkway leading into the bottom dog house was covered with diesel, making the walkway extremely slippery.

Date By Which Violation Must be Abated: 11/10/2011
Proposed Penalty: \$ 7000.00

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 3, Truitt Woods #1, Lamesa, TX 79331

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

29 CFR 1910.176(b): Material stored in tiers was not stacked, blocked, interlocked or limited in height so that it was stable and secure against sliding and collapse:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, the end(s) of the pipe rack(s) was not chocked to prevent pipe stock from rolling.

Date By Which Violation Must be Abated: 11/16/2011
Proposed Penalty: \$ 6600.00

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

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

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, a Sunbeam microwave located in the bottom dog house did not have a ground pin in place.

Date By Which Violation Must be Abated: 11/16/2011
Proposed Penalty: \$ 5500.00

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 3, Truitt Woods #1, Lamesa, TX 79331

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury resulting from an accident.

Citation 1 Item 8a Type of Violation: **Serious**

29 CFR 1910.305(g)(1)(iv): Flexible cords and cables were used for purposes prohibited by subparagraphs (A) through (F) of this paragraph:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, a flexible cord used to supply power to the mud mixing pump ran through a hole cut into the metal generator house building.

Date By Which Violation Must be Abated: 11/16/2011
Proposed Penalty: \$ 7000.00

Citation 1 Item 8b Type of Violation: **Serious**

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

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, a flexible cord used to supply power to the mud mixing pump had an improper splice.

Date By Which Violation Must be Abated: 11/16/2011

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 3, Truitt Woods #1, Lamesa, TX 79331

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

29 CFR 1904.29(a): The employer did not use OSHA 300, 300-A, and 301 forms, or equivalent forms, for recordable injuries and illnesses.

Located at the Robinson Drilling of Texas, Ltd., 607 S. Main, Big Spring, TX: On or about 06/11/11, the employer did not record the following workplace injuries and illnesses correctly on an OSHA 301 for calendar year 2011:

a) On or about 03/12/11, Floorhand - an employee received a fracture to right ribs and the case was recorded as a days away case. The OSHA 301 was not completed for this injury.

ROBINSON DRILLING OF TEXAS, LTD WAS PREVIOUSLY CITED FOR A VIOLATION OF THIS OCCUPATIONAL SAFETY AND HEALTH STANDARD OR ITS EQUIVALENT STANDARD 29 CFR 1904.29(a) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 309758092, CITATION NUMBER 02, ITEM NUMBER 001, AND WAS AFFIRMED AS A FINAL ORDER ON 09/06/07, WITH RESPECT TO A WORKPLACE LOCATED AT ROCKER B WELL #1, BARNHART, TX.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 5000.00

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 3, Truitt Woods #1, Lamesa, TX 79331

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

29 CFR 1904.29(a): The employer did not use OSHA 300, 300-A, and 301 forms, or equivalent forms, for recordable injuries and illnesses.

Located at the Robinson Drilling of Texas, Ltd., 607 S. Main, Big Spring, TX: On or about 06/11/11, the employer did not record the following workplace injuries and illnesses correctly on an OSHA 301 for calendar year 2007:

- a) On or about 05/03/07, Floorhand - an employee received a fracture to left foot and the case was recorded as a days away case. The OSHA 301 was not completed for this injury.
- b) On or about 09/22/07, Toolpusher - an employee received a contusion to the left shoulder and elbow and the case was recorded as a days restricted case. The OSHA 301 was not completed for this injury.

ROBINSON DRILLING OF TEXAS, LTD WAS PREVIOUSLY CITED FOR A VIOLATION OF THIS OCCUPATIONAL SAFETY AND HEALTH STANDARD OR ITS EQUIVALENT STANDARD 29 CFR 1904.29(a) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 309758092, CITATION NUMBER 02, ITEM NUMBER 001, AND WAS AFFIRMED AS A FINAL ORDER ON 09/06/07, WITH RESPECT TO A WORKPLACE LOCATED AT ROCKER B WELL #1, BARNHART, TX.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 5000.00

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 3, Truitt Woods #1, Lamesa, TX 79331

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

29 CFR 1910.134(c)(1): In the workplace where respirators were necessary to protect the health of the employees or were required by the employer to be worn, the employer did not establish and implement a written respiratory program which met the requirements of (c)(1)(i) to (ix) of this section and specific to the workplace where the respiratory protection was required and in use:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, the company did not establish a written respiratory protection program where respirators were maintained for emergency use.

ROBINSON DRILLING OF TEXAS, LTD. WAS PREVIOUSLY CITED FOR A VIOLATION OF THIS OCCUPATIONAL SAFETY AND HEALTH STANDARD OR ITS EQUIVALENT STANDARD 29 CFR 1910.134(c)(1) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 309758092, CITATION NUMBER 2, ITEM NUMBER 3, AND WAS AFFIRMED AS A FINAL ORDER ON 09/06/07, WITH RESPECT TO A WORKPLACE LOCATED AT ROCKER B RANCH, BARNHART, TX.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 5000.00

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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 2 Item 4 Type of Violation: Repeat

29 CFR 1910.305(g)(2)(iii): Flexible cords were not connected to devices and fittings so that strain relief was provided which would have prevented pull from being directly transmitted to joints or terminal screws:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, the flexible cord supplying power to the tool pusher's trailer did not have strain relief provided.

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(g)(2)(iii) WHICH WAS CONTAINED IN OSHA INSPECTION NUMBER 309758183, CITATION NUMBER 1, ITEM NUMBER 1, AND WAS AFFIRMED AS A FINAL ORDER ON 04/20/07, WITH RESPECT TO A WORKPLACE LOCATED AT ROCKER B RANCH, BARNHART, TX.

Date By Which Violation Must be Abated: 11/16/2011
Proposed Penalty: \$ 16500.00

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 3, Truitt Woods #1, Lamesa, TX 79331

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

29 CFR 1904.7(b)(3): When an injury or illness involved one or more days away from work, the employer failed to record the injury or illness on the OSHA 300 log with a check mark in the space for cases involving days away from work:

Located at the Robinson Drilling of Texas, Ltd., 607 S. Main, Big Spring, TX: On or about 06/11/11, the employer did not record the following workplace injuries and illnesses correctly on the OSHA 300 Log for calendar year 2011:

- a) On or about 03/15/11, Derricks - an employee received a strain to groin area and the case was recorded as a days away case with 0 days away from work. This case resulted in days away from work.
- b) On or about 03/28/11, Floorhand - an employee suffered effects of heat stress and the case was recorded as one (1) day away from work. There was not a mark in the days away from work column.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00

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 3, Truitt Woods #1, Lamesa, TX 79331

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

29 CFR 1904.7(b)(3): When an injury or illness involved one or more days away from work, the employer failed to record the injury or illness on the OSHA 300 log with a check mark in the space for cases involving days away from work:

Robinson Drilling of Texas, Ltd., 607 S Main, Big Spring, TX. For the period of time up to and including 06/11/11, the company did not record the following workplace injuries and illnesses correctly on the OSHA 300 Log for calendar year 2010:

- a) On or about 03/06/10, Derricks - Contusion to left foot. One (1) day of work was missed due to this incident while no days were indicated in the 'Days Away' column.
- b) On or about 05/04/10, Floor Hand - Contusion to left rib area. A check mark indicated this incident was a 'Restricted Duty' instance when the employee missed two (2) days of work.
- c) On or about 06/14/10, Superintendent - Contusion to lower back. Three (3) days of work were missed due to this incident while there was not a check mark in the 'Days Away From Work Column'.
- d) On or about 07/11/10, Derricks - Fracture to left forearm. Four (4) days of work were missed due to this incident while no days were indicated in the 'Days Away' column.
- e) On or about 07/13/10, Floor Hand - Fracture to right wrist and lower transverse on lower lumbar. Days were missed due to this incident while no days were indicated in the 'Days Away' column.
- f) On or about 07/13/10, Floor Hand - Fracture to ribs, punctured lung, multiple contusions. Days were missed due to this incident while no days were indicated in the 'Days Away' column.
- g) On or about 09/10/10, Floor Hand - Sprain to back and knee. One hundred, eleven (111) days were missed due to this incident while no days were indicated in the 'Days Away' column.

Date By Which Violation Must be Abated:	12/09/2011
Proposed Penalty:	\$ 1100.00

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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 3 Item 3 Type of Violation: **Other**

29 CFR 1904.7(b)(4): When an injury or illness involves restricted work or job transfer but does not involve death or days away from work the employer must record the injury or illness on the OSHA 300 log by placing a check mark in the space and an entry of the number of restricted or transferred days in the restricted workdays column:

Robinson Drilling of Texas, Ltd., 600 S. Main, Big Spring, TX. For the period of time up to and including 06/11/11, the company did not record the following workplace injuries and illnesses correctly on the OSHA 300 Log for calendar year 2011.

- a) On or about 02/10/11, Floorhand - an employee's left second finger was pulled around the belt and through the pulley on a power washer resulting in 15 days of restricted work activity. The employer did not mark either the 'days away' nor the 'days restricted' space.
- b) On or about 06/02/11, Floorhand - an employee was struck on the face by drilling line resulting in one (1) day of restricted work activity. The employer did not mark either the 'days away' nor the 'days restricted' space.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00

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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 3 Item 4 Type of Violation: **Other**

29 CFR 1904.7(b)(4): When an injury or illness involves restricted work or job transfer but does not involve death or days away from work the employer must record the injury or illness on the OSHA 300 log by placing a check mark in the space and an entry of the number of restricted or transferred days in the restricted workdays column:

Robinson Drilling of Texas, Ltd., 600 S. Main, Big Spring, TX. For the period of time up to and including 06/11/11, the company did not record the following workplace injuries and illnesses correctly on the OSHA 300 Log for calendar year 2010.

- a) On or about 08/06/10, Driller - an employee strained his left shoulder resulting in five days of restricted work activity. The employer incorrectly recorded a day(s) of restricted work activity case 1904.7(b)(4) as a medical treatment case on the log.
- b) On or about 09/10/10, Floorhand - an employee fractured and lacerated his left ring finger resulting in ten days of restricted work activity. The employer incorrectly recorded a day(s) of restricted work activity case 1904.7(b)(4) as a medical treatment case on the log.
- c) On or about 11/02/10, Floorhand - an employee caught arm between collars, resulting in contusions to the arm. This incident resulted in two days of restricted work activity. The employer incorrectly recorded neither a day(s) of restricted work activity case 1904.7(b)(4) or a days away work activity case 1904.7(b)(3).

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00

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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 3 Item 5 Type of Violation: Other

29 CFR 1904.7(b)(4): When an injury or illness involves restricted work or job transfer but does not involve death or days away from work the employer must record the injury or illness on the OSHA 300 log by placing a check mark in the space and an entry of the number of restricted or transferred days in the restricted workdays column:

Robinson Drilling of Texas, Ltd., 600 S. Main, Big Spring, TX. For the period of time up to and including 06/11/11, the company did not record the following workplace injuries and illnesses correctly on the OSHA 300 Log for calendar year 2009.

a) On or about 10/30/09, Floorhand - an employee's fingertip was lacerated by the rotary bushing resulting in 15 days of restricted work activity. The employer did not mark either the 'days restricted' space or the number of days restricted.

b) On or about 12/01/09, Floorhand - an employee's finger was lacerated when it was caught between the spinning chain and the pipe resulting in 10 days of restricted work activity. The employer did not mark the number of days restricted.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00

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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 3 Item 6 Type of Violation: **Other**

29 CFR 1904.7(b)(5): When an injury or illness involves medical treatment beyond first aid, the employer must record the injury or illness on the OSHA 300 log by placing a check mark in the space:

Robinson Drilling of Texas, Ltd., 600 S. Main, Big Spring, TX. For the period of time up to and including 06/11/11, the company did not record the following workplace injuries and illnesses correctly on the OSHA 300 Log for calendar year 2011.

- a) On or about 05/30/11, Floorhand - an employee was struck on the right arm by the spinning chain resulting in medical treatment beyond first aid. The employer did not mark any column.
- b) On or about 04/17/11, Floorhand - an employee strained his lower abdomen resulting in medical treatment beyond first aid. The employer did not mark any column.
- c) On or about 04/07/11, Floorhand - an employee was struck by a joint of pipe on the arm resulting in medical treatment beyond first aid. The employer did not mark any column.
- d) On or about 01/77/11, Floorhand - an employee's right hand was caught between the pipe and the rotating head resulting in medical treatment beyond first aid. The employer did not mark any column.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00

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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 3 Item 7 Type of Violation: Other

29 CFR 1904.7(b)(5): When an injury or illness involves medical treatment beyond first aid, the employer must record the injury or illness on the OSHA 300 log by placing a check mark in the space:

Robinson Drilling of Texas, Ltd., 600 S. Main, Big Spring, TX. For the period of time up to and including 06/11/11, the company did not record the following workplace injuries and illnesses correctly on the OSHA 300 Log for calendar year 2009.

a) On or about 11/15/09, Floorhand - an employee slipped down the V-door slide resulting in medical treatment beyond first aid. The employer did not mark this column.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00

Citation 3 Item 8 Type of Violation: Other

29 CFR 1904.29(b)(1): A Log of all recordable work-related injuries and illnesses (OSHA For 300 or equivalent), was not completed in the detail as required by the regulation:

Located at the Robinson Drilling of Texas, Ltd., 607 S. Main, Big Spring, TX: On or about 06/11/11, the employer did not include the injured employees' name on the OSHA 300 Log for calendar year 2008.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00

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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 3 Item 9 Type of Violation: Other

29 CFR 1904.29(b)(1): A Log of all recordable work-related injuries and illnesses (OSHA For 300 or equivalent), was not completed in the detail as required by the regulation:

Located at the Robinson Drilling of Texas, Ltd., 607 S. Main, Big Spring, TX: On or about 06/11/11, the employer did not include a recordable injury / illness on the OSHA 300 Log for calendar year 2007.

- a) On or about 01/29/07, Unknown - an employee stepped on a nail and the case was not recorded.
- b) On or about 04/21/07, Unknown - an employee felt pain in the abdomen area and the case was not recorded.
- c) On or about 04/30/07, Unknown - an employee received finger lacerations and the case was not recorded.
- d) On or about 05/04/07, Unknown - an employee received a fracture to the nose and the case was not recorded.
- e) On or about 05/04/07, Unknown - an employee received a fracture to the nose and the case was not recorded.
- f) On or about 06/16/07, Unknown - an employee received a contusion to the right wrist and the case was not recorded.
- g) On or about 07/25/07, Unknown - an employee received a contusion to the left upper arm and the case was not recorded.
- h) On or about 08/08/07, Unknown - an employee received a fractured patella and the case was not recorded.
- i) On or about 09/26/07, Unknown - an employee received a contusion / laceration to the right hand and the case was not recorded.
- j) On or about 10/16/07, Unknown - an employee sprained his right knee and the case was not recorded.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00

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 3, Truitt Woods #1, Lamesa, TX 79331

Citation 3 Item 10 Type of Violation: Other

29 CFR 1904.29(b)(2): Each employer required by this part to keep records of fatalities, injuries, and illnesses did not complete an OSHA 301 Incident Report form, or equivalent form, for each recordable injury or illness entered on the OSHA 300 log:

Located at the Robinson Drilling of Texas, Ltd., 607 S. Main, Big Spring, TX: On or about 06/11/11, the employer did not complete the information on the OSHA 301 Log for calendar year 2011.

a) On or about 03/17/11, Floor Hand - an employee received a laceration to the chin. The OSHA 301 did not have all parts completed.

Date By Which Violation Must be Abated: 12/09/2011
Proposed Penalty: \$ 1100.00



Citation and Notification of Penalty

Company Name: Robinson Drilling of Texas, Ltd.
Inspection Site: Rig 3, Truitt Woods #1, Lamesa, TX 79331

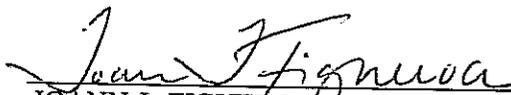
Citation 3 Item 11 Type of Violation: Other

29 CFR 1910.157(e)(2): Portable fire extinguishers were not visually inspected at least monthly:

Robinson Drilling of Texas, Ltd., Rig 3, Truitt Woods #1, Dawson County, TX. For the period of time up to and including 06/11/11, fire extinguishers in the following locations had not been visually inspected:

- a. A fire extinguisher located at the accumulator was last inspected March 2011.
- b. A fire extinguisher located at the generator house was last inspected March 2011.
- c. A fire extinguisher located at the mud pit was last inspected February 2011.

Date By Which Violation Must be Abated: 11/16/2011
Proposed Penalty: \$ 100.00


JOANN J. FIGUEROA
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

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



**INVOICE/
DEBT COLLECTION NOTICE**

Company Name: Robinson Drilling of Texas, Ltd.
Inspection Site: Rig 3, Truitt Woods #1, Lamesa, TX 79331
Issuance Date: 11/07/2011

Summary of Penalties for Inspection Number 315277541

Citation 1, Serious	= \$	51100.00
Citation 2, Repeat	= \$	31500.00
Citation 3, Other	= \$	11100.00
TOTAL PROPOSED PENALTIES	= \$	93700.00

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.



JOANN J. FIGUEROA
Area Director

11/7/11
Date

U.S. Department of Labor

Occupational Safety and Health Administration
Room 806, Federal Building
1205 Texas Avenue
Lubbock, TX 79401
Phone: (806) 472-7681
Fax: (806) 472 7686



Robinson Drilling of Texas, Ltd.
607 S. Main
Big Spring, TX 79720

Dear Employer:

Under a law passed by Congress in 1996, the Small Business Administration (SBA) has established the SBA Ombudsman and SBA Regional Fairness Boards to investigate small business complaints pertaining to federal agency enforcement actions.

If you are a small business and believe you have been treated unfairly by the Occupational Safety and Health Administration (OSHA), you may file a written, signed complaint with the SBA Ombudsman at:

Small Business Administration
Office of the National Ombudsman
409 Third Street SW
Washington, DC 20024
Phone: (202) 205-2417
FAX: (202) 481-5719

You can also access and download the Complaint/Comment form by visiting their website at:

<http://www.sba.gov/aboutsba/sbaprograms/ombudsman/index.html>

Or, call Toll Free: 1-888-REGFAIR

NOTE: Filing a complaint with the SBA Ombudsman does not affect any obligation you may have to comply with an OSHA citation or other enforcement action. Nor does it mean you need not take other available legal steps to protect your interest.

Your support in worker occupational health and safety is appreciated.

Sincerely,

JOANN J. FIGUEROA
Area Director