

MARITIME HELICOPTERS

NTSB Party Submission of Proposed Findings

(Amended 07-23-25)

NTSB Accident File: ANC23FA056

Operator: Maritime Helicopters

Aircraft: Bell 206-L4

Registration: N311MH

Date of Accident: June 20, 2023, 11:05 Local

Location of Accident: Wainwright, Alaska

Date of Submission: July 15, 2025

Prepared By: Maritime Helicopters

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Introduction

Maritime Helicopters participated as a party to the National Transportation Safety Board's investigation of the tragic accident in Wainright, Alaska, on July 20, 2023. Maritime Helicopters would like to thank the NTSB and the other parties to the investigation for their diligence and commitment to determining the cause of the incident and enhancing public safety.

Maritime Helicopters offers the analysis which follows based upon the information that was provided during the course of the NTSB investigation. To the extent that the NTSB's analysis differs, and particularly if any differences are based upon information not available to, or considered by, Maritime Helicopters, we welcome the opportunity to discuss those differences.

Maritime Helicopters

Maritime Helicopters has been serving Alaska since 1973. We are an Alaskan owned small business emphasizing safety, professionalism and customer service. Our crews staff year-round bases throughout Alaska, with experience flying in the Western Aleutians, High Arctic, North Slope, Southeast and Interior regions of Alaska. We serve federal, state and local agencies and industries in oil and gas production, mining, environmental, mining, film, surveying, construction, exploration, medevac, volcano studies and wildlife survey and capture.

We operate light lift helicopters out of our bases and customer services in Homer and Fairbanks, with satellite facilities in at Akutan, Kenai, Kodiak and Valdez Airports. Our helicopters include:

- BO 105-CBS-4;
- Bell 407;
- Bell 206 L4; and
- Bell 206 L3.

Maritime Helicopters employs over 70 people, including 28 pilots. We fly approximately 7,500 hours annually.

Maritime Helicopters Safety Management System

Our Safety Management System combines safety guidance from a variety of sources including the FAA, Transport Canada, and ICAO.

Our internal programs – Safety Risk Management, Safety Promotion and Safety Assurance, in addition to routine employee safety meetings, all integrate together to support a positive and just safety culture at Maritime Helicopters.

An important aspect of Safety Assurance is our confidential reporting system. Reports concerning hazards, injuries, error damages, accidents and incidents and general concerns are used for confidential reporting to our Director of Safety.

Training

Maritime Helicopters has a comprehensive basic, initial and recurrent pilot training program. The training makes use of Federal Aviation Regulations, manufacturers' data, other publications, and acquired experience to enhance the knowledge and proficiency of the crewmembers engaged in FAR §135 operations for Maritime Helicopters, Inc.

Training Topics over and above those focusing upon specific aircraft, Include:

- CFR §67 Medical Standards and Certification
- CFR §91 General Operating and Flight Rules
- CFR §135 Operating Requirements; Commuter and On Demand Operating Rules.
- Meteorology to include adverse weather
- Overwater Operations
- External Load Operations
- Procedures for recognizing and avoiding severe weather situations.
- Procedures for aircraft handling in flat-light, whiteout, and brownout conditions, including methods for recognizing and avoiding those conditions.
- Procedures for Mitigating and Recovering from Brownout, Whiteout, and/or Flat Light Conditions
- Use of External Lights
- Confined Area Operations
- Crew Resource Management, including situational awareness
- Crewmember Recurrent Training
- Hazardous Materials
- Fuel handling, safety & Fire
- First Aid
- Survival / Cold Weather Operations

Helicopter flight test evaluations require that all pilots consistently be able to:

- Execute procedures and maneuvers within the aircraft performance capabilities and limitations, including use of the aircraft systems.
- Execute emergency procedures and maneuvers appropriate to the aircraft.
- Pilot the aircraft with smoothness and accuracy.
- Exercise good judgment.
- Apply aeronautical knowledge.

- Show that he or she are the master of the aircraft with the successful outcome of the procedure or maneuver never in doubt
- Execute crewmember duties in a professional manner withing the guidelines set forth in the appropriate FARs and the Maritime Helicopters, Inc. ATCO Operations Manual and SOP.
- Demonstrate the following during the knowledge test evaluation:
 - o Knowledge of FAR Part 61, 91, and 135 and the operations specifications.
 - o Knowledge of the Maritime Helicopters Inc. ATCO Operations Manual and SOP.
 - o Knowledge of Air Traffic Control procedures.
 - o Meteorology in general, including the principles of frontal systems, icing, fog, thunderstorms, and windshear.
 - o Procedures for recognizing and avoiding severe weather situations.
 - o Procedures for aircraft handling in flat-light, whiteout, and brownout conditions, including methods for recognizing and avoiding those conditions.
 - o Escaping from severe weather situations.
 - o Operating in or near thunderstorms (including best penetrating altitudes), turbulent air (including clear air turbulence), icing, hail, and other potentially hazardous meteorological conditions.
 - o New equipment, procedures, or techniques.
 - o Navigation and use of air navigation aids appropriate to the operation.
 - o Knowledge of the powerplant, major components and systems, major appliances, performance and operating limitations, standard and emergency operating procedures, and the contents of the approved aircraft flight manual.
 - o Method of determining compliance with weight and balance limitations for take-off, landing, and enroute operations.
- Demonstrate the following during the flight test evaluation:
 - o Preflight Inspections
 - o Start procedures
 - o Taxiing and ground hover
 - o Normal Takeoff and Landing
 - o Rapid deceleration
 - o Settling with power
 - o Unusual attitude recovery
 - o Recovery from IIMC
 - o Maneuver by partial panel
 - o Instrument approach
 - o Power failure and autorotation to a power recovery
 - o Hover autorotation
 - o Tail rotor failure (oral)

- o Dynamic rollover (oral)
- o Low rotor RPM (oral)
- o Antitorque system failure (oral)
- o Confined area
- o Pinnacle operations
- o Slope operations

Our training materials include extensive discussion of meteorology, including the principles of frontal systems, icing, fog, thunderstorms, and windshear and procedures for recognizing and avoiding severe weather situations and operating near thunderstorms (including best penetrating altitudes), turbulent air (including clear air turbulence), icing, hail, and other potentially hazardous meteorological conditions.

Entire chapters of the training materials, and the Maritime Helicopter Standard Operating Procedures, are dedicated to procedures for mitigating and recovering from brownout, whiteout, and/or flat light conditions during takeoff, enroute and upon approach and landing. Particular caution is advised as to operation of helicopters in areas that are conducive to flat light/whiteout conditions, including the North Slope of Alaska, mountain passes above the tree line, glaciers, and other areas of flat featureless terrain, unless:

- the in-flight visibility is at least 1 mile during daylight hours;
- a visual surface reference can be maintained which would allow a safe landing;
- a visible horizon can be maintained that distinguishes the sky and ground; and
- the aircraft has an operational radar altimeter.

July 20, 2023, Accident

The factual description of the accident and the inspection of the recovered aircraft as set forth in the NTSB Factual Report that has been provided to Maritime Helicopters are broadly accurate.

That said, helicopters routinely operate at altitudes of 500 feet AGL or less. Indeed, the FAA recommends autorotation training at altitudes as low as 500 feet AGL.

Concern re Opinion and Speculation in NTSB Factual Report

The Factual Report provided to Maritime Helicopters contains unsupported opinions and speculation, as well as multiple misleading statements. These concerns were shared with the Investigator-in-Charge but were not addressed.

Opinion from Unidentified Helicopter Pilot Operating "in the Same Area"

The Factual Report at page 3 states:

"A helicopter pilot operating in the same area said, in general, if there is poor flying weather, he will fly around 800 to 1200 ft msl. With no weather, he will fly between 3,000 and 4000 ft msl. When asked about the speed and altitude of the accident helicopter was flying at, he said based on his experience in that area that was "too fast" at those altitudes."

This opinion, without any information about this pilot's background, education and experience, is speculation. There is no information about how many hours as PIC the pilot has, in what aircraft, where, in what types of missions and in what conditions and terrain. The reader is offered no information upon which to evaluate whether the pilot is qualified to offer this opinion.

There is no information about what specific "poor flying weather" allows him to fly between 800 and 1,200 ft msl. The pilot's reference to "msl" in this context suggests that he has very little experience. There is no information as to the wind conditions, temperature, visibility, cloud clearances, turbulence and other weather criteria. The opinion suggests that there are no weather conditions that would require anyone, for safety reasons, to fly lower than 800 ft msl (AGL). This is simply not true.

There is no information about what missions this pilot flies such that he is routinely flying at 3,000 ft to 4,000 ft msl (AGL) when "there is no weather." This is, of course, a surprisingly high altitude for a helicopter to be routinely flying and again calls into question the background and experience of the unidentified pilot.

The Altitude Restrictions in the Alaska DNR Permit are not Safety Related

The Factual Report at page 7 states:

"The operator reported that the accident pilot did not receive the altitude flight restrictions that are required by the Alaska DNR permit"

If a flight is being operated pursuant to a permit issued to a customer, it is that customer's obligation to provide that permit to Maritime Helicopter. No permit was provided to Maritime Helicopter for this flight and thus the pilot was not provided any permit.

More importantly, it is misleading for an NTSB safety investigation to make any reference to "altitude flight restrictions that are required by an Alaska DNR permit" because the intent of the altitude restrictions is to minimize the effects of low-flying aircraft on wildlife, subsistence activities, and local communities and not the safety of the aircraft. The flight altitudes in Alaska DNR permits are not safety-related, and the restrictions do not apply when they conflict with mission requirements or adhering to them would endanger human life or violate safe flying practices.

Without this context, the reader is left with the impression that flying lower than the designated DNR altitudes is unsafe. That is simply not true. Helicopters routinely fly very safely at altitudes much lower than those specified in DNR permits.

Flight Operational Quality Assurance Programs are not Pilot-Specific

The Factual Report at page 7 goes on to state:

“The operator does not have a Flight Operational Quality Assurance program and does not review flight history to detect unsafe behaviors.”

FAA Advisory Circular 120-82 dated 04-12-04, however, confirms that Flight Operational Quality Assurance programs make use of de-identified, aggregate data. This ensures that the focus remains on identifying trends and patterns rather than individual performance. They are not mandatory and do not allow any analysis of pilot-specific data. It is misleading to imply, without more, that the absence of a Flight Operational Quality Assurance program is relevant to this investigation.

Maritime Helicopters monitors for unsafe behaviors via various methods, including required competency checks by company check airmen, line checks and customer feedback.

Maritime Helicopters Requires its Pilots to Comply with FAA Altitude Minimums

The Factual Report at page 7 also states:

“The Director of Operation for the operator said, “they fly as high as they can and avoids flying over water in poor weather conditions.” The only time they fly low is because of poor weather. He was not sure why the pilot would choose to fly so low and at that speed.”

This statement is taken out of context. The statement unfairly suggests that merely because the Director of Operations “was not sure” why the pilot was flying at the altitudes and speeds recorded, that the pilot was violating safe flying practices. We do not know that, and it is speculation to suggest that we do.

Maritime Helicopters requires its pilots to comply with FAA altitude minimums. These include 14 CFR §91.119, 14 CFR §135.203 and 14 CFR §135.207. There are, of course, many other factors that a pilot must consider in determining what altitude is appropriate for the given conditions. Starting with the noted regulations, these include (but of course are not limited to) general safety, navigation issues, wind, temperature, visibility, cloud clearances, turbulence and other weather criteria, mission requirements, class of airspace, equipment issues, terrain, traffic, and DNR restrictions as to noise mitigation and wildlife concerns.

We also note the suggestion in the 08-09-23 e-mail to the NTSB from Benjamin Jones, a research professor at the University of Alaska in Fairbanks and a friend of one of the geologists on board (Ronnie Daanen), that the geologist had an interest in identifying locations on the North Slope where methane gas was venting to the surface through shallow lake sediments in the region and that this may have been the

reason the flight was at a low altitude. While there is no evidence to confirm this, it is an alternate explanation to poor weather as to why this pilot was at a low altitude.

Weather on the North Slope Can Change Quickly and Can Vary Greatly from Mile to Mile

Given that weather concerns may have played a role in this accident, it certainly makes sense to include information about the weather at the accident location.

It is misleading, however, for the Factual Report to provide weather reports from locations 55, 36 and 27 miles away without alerting the reader how well known it is in the Alaska aviation community that weather on the North Slope can change quickly and can vary greatly from mile to mile.

In this regard:

The 1995 NTSB Safety Study “**Aviation Safety in Alaska**” (NTSB/SS-95/03, Notation 6465A), states

- Page 10, Chapter 3 Aviation Environment: “Flying weather in Alaska can be quite variable depending on the climatic zone and time of year”
- Page 46, VFR Operations, Observations of Weather Conditions: “Weather conditions can change rapidly in Alaska, and the vast distances between some weather reporting points will often conceal significant local variations in the weather....
- Page 54, VFR Operations, Mike in Hands Weather Updates – The National Weather Service has a longstanding national policy that generally prohibits NWS employees from providing near-real-time “mike-in-hand” weather and airport information to pilots. In contrast, the FAA provides mike-in-hand weather and airport information at all FSS and FAA contract weather observing facilities in Alaska. ” The safety advantages of providing near real-time weather information to pilots are significant, especially in Alaska, given the current limitations of automated surface weather observing systems. The Safety Board believes that the NWS should revise its current policies to provide mike-in-hand radio service for aviation surface weather information at locations in Alaska where NWS and contract weather observers are sited until automated surface weather observing systems transmit observations of all operationally significant weather phenomena to pilots operating in the terminal area.”

“Survey and Analysis Of Air Transportation Safety Among Air Carrier Operators and Pilots In Alaska”

CDC Workplace Safety & Health, November 2006, states on page 10, Introduction:

“Additional unique Alaska features affecting aviation are large areas of high, mountainous terrain; flat, marshy tundra; and an extensive coastline. These factors at Alaska’s northern latitudes result in diverse climatic zones and associated weather that is variable and often harsh. Poor visibility and rapidly changing weather are common and contribute to the

problems of air transportation in Alaska. Because of the high cost to cover such a large area, most of Alaska has been without usable infrastructure for instrument flight rule routes that permit low altitude flying into small villages.”

“Aviation Weather Services – A Call for Federal Leadership in Action,” National Academies Sciences, Engineering, Medicine, 1995, states in Chapter 5, Regional Requirements:

“Alaska, more than any other region of the United States, seems to have an aviation environment that illustrates how regional needs can differ from national norms. Therefore, the committee considered the special needs of Alaskan aviation in some detail. However, the committee recognizes that Alaska is not the only region of the United States that has special needs. Variations in aviation weather regional requirements also exist in other areas, such as the islands of Hawaii and remote or mountainous regions in the west and northeast...”.

Additional Opinion From Unidentified Helicopter Pilot Operating “in the Same Area”

Finally, the Factual Report at page 9 states:

“A pilot from a different operator reported that he was operating in the same area as the accident helicopter. He stated he departed Utqiagvik (PABR) to the southwest on the day of the accident, between 0900 and 1000. He said there was no ceiling, no altitude restrictions, and no issues with visibility. The temperature that day was one of the warmest days he had ever seen. When he returned to Utqiagvik that night, he noticed the accident helicopter was not back yet. It was very unusual for him to be back before the accident helicopter. He called the FAA flight service center with his concern but was told they had no flight plan and no information on when the accident helicopter was returning.

As earlier noted, it is very well known in the Alaskan aviation community that weather on the North Slope can change quickly and can vary greatly from mile to mile.

A pilot stating that he was operating “in the same area as the accident helicopter” and that he had no [weather related] altitude restrictions and no issues with visibility very clearly communicates the opinion that the pilot at issue ought not have had any weather-related restrictions and no issues with visibility when and where the accident occurred. This pilot’s reference to “in the same area as the accident helicopter” is completely undefined. The Report contains no information about how far away from the actual accident location the unnamed pilot was at 11:05 AM when this accident occurred. Without this information and given the often rapidly changing weather on the North Slope, this opinion is speculation.

Proposed Findings

1. The pilot had 12 years of experience in a structured and disciplined environment, including comprehensive military training and over 1,900 hours of worldwide flight operation.

2. The Maritime Helicopters Pilot Training program is well defined and comprehensive.
3. Pilot training was not a factor in this accident.
4. Maritime Helicopter's safety culture was not a factor in this accident.
5. The pilot had no history of any flight behavior outside standard operating procedures.

Probable Cause

The NTSB investigation information shared with Maritime Helicopter is not sufficient to formulate any opinion as to the probable cause of this tragic accident.

As noted at the onset, should the NTSB analysis and conclusions differ, and particularly if any differences are based upon information not available to, or considered by, Maritime Helicopters, we welcome the opportunity to discuss those differences.