



Industry Practices for Incident Response

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► Regulations

COGCC, CDPHE, OSHA, BLM

COGCC - Rule 906

- ▶ (1) Report to the Director. Operators shall report a spill or release of E&P Waste or produced fluids that meet any of the following criteria to the Director verbally or in writing as soon as practicable, but no more than **twenty-four (24) hours after discovery** (the “Initial Report”).
 - ▶ A. A spills/release of any size that impacts or threatens to impact any waters of the state, a residence or occupied structure, livestock, or public byway;
 - ▶ B. A spill/release in which one (1) barrel or more of E&P Waste or produced fluids is spilled or released outside of berms or other secondary containment;
 - ▶ C. A spill/release of five (5) barrels or more regardless of whether the spill/release is completely contained within berms or other secondary containment.
- ▶ The Initial Report to the Director shall include, at a minimum, the location of the spill/release and any information available to the Operator about the type and volume of waste involved.
- ▶ If the Initial Report was not made by submitting a COGCC Spill/Release Report, Form 19 the Operator must submit a Form 19 with the Initial Report information as soon as practicable but not later than 72 hours after discovery of the spill/release unless extended by the Director.

COGCC - Rule 906

- ▶ (2) **Notification to the local government.** In addition to the Initial Report to the Director, as soon as practicable, but not more than 24 hours after discovery of a spill/release of E & P Waste or produced fluids reportable under Rule 906.b.(1)A or B, above, an Operator shall provide verbal or written notification to the entity with jurisdiction over emergency response within the local municipality if the spill/release occurred within a municipality or the local county if the spill/release did not occur within a municipality. The notification shall include, at a minimum, the information provided in the Initial Report to the Director.
- ▶ (3) **Notification to the Surface Owner.** In addition to the Initial Report to the Director, within 24 hours after discovery of a spill/release of E & P Waste or produced fluids reportable under Rule 906.b.(1)A or B, an Operator shall provide verbal notification to the affected Surface Owner or the Surface Owner's appointed tenant. If the Surface Owner cannot be reached within 24 hours, the Operator shall continue good faith efforts to notify the Surface Owner until notice has been provided. The verbal notification shall include, at a minimum, the information provided in the Initial Report to the Director.
- ▶ (4) **Report to Environmental Release/Incident Report Hotline.** A spill/release of any size which impact or threaten to impact any surface water supply area shall be reported to the Director and to the Environmental Release/Incident Report Hotline (1-877-518-5608). Spills and releases that impact or threaten a surface water intake shall be verbally reported to the emergency contact for that facility immediately after discovery.
- ▶ (5) **Reporting chemical spills or releases.** Chemical spills and releases shall be reported in accordance with applicable state and federal laws, including the Emergency Planning and Community Right-to-Know Act, the Comprehensive Environmental Response, Compensation, and Liability Act, the Oil Pollution Act, and the Clean Water Act, as applicable.

COGCC – Rule 602

- ▶ An operator must notify the Director and the local governmental designee of the applicable jurisdiction of reportable safety events at an oil and gas facility. Reportable safety events include:
 - ▶ (1) Any accidental fire, explosion, or detonation, or uncontrolled release of pressure;
 - ▶ (2) Any accident or natural event that results in a reportable injury as defined by the U.S. Department of Labor, Occupational Safety and Health Administration, at 29 C.F.R. § 1904.39 in existence as of the date of this regulation and no later amendments. 29 C.F.R. § 1904.39 is available for public inspection during normal business hours from the Public Room Administrator at the office of the Commission, 1120 Lincoln Street, Suite 801, Denver, Colorado 80203. Additionally, 29 C.F.R. § 1904.39 may be found at <https://www.osha.gov> ; or
 - ▶ (3) Any accident or natural event that results in an injury to a member of the general public that requires medical treatment.
- ▶ d. Initial notification from the operator of a reportable safety event described in c.(1) -(3) above, must occur as soon as practicable, but no more than 6 hours after the safety event. An Accident Report, Form 22, must be submitted to the Director within 3-days of the accident or natural event.
 - ▶ (1) At the Director's request, the operator must submit a supplemental report that details the root cause, information about any repairs, or other information related to the accident.
 - ▶ (2) At the Director's request, the operator must present its root cause about the accident to the Commission or to an oil and gas safety review organization approved by the Director.
 - ▶ e. Where unsafe or potentially dangerous conditions exist and first responders are on-site, the owner or operator must respond as directed by first responders (such as sheriff, fire district director, etc.)

BLM - Notice to Lessees (NTL)-3A

- ▶ Operators of onshore Federal and Indian oil and gas leases shall report all spills, discharges, or other undesirable events in accordance with the requirements of this Notice. All such events which occur on State or private land leases within federally supervised unit or communitized areas must likewise be reported in accordance with the requirements of this Notice.
- ▶ Major undesirable events are defined as those incidents listed below in subsections A through F. These incidents, when occurring on a lease supervised by the GS, must be reported to the appropriate District Engineer as soon as practical but within a maximum of 24 hours:
- ▶ A. Oil, saltwater, and toxic liquid spills, or any combination thereof, which result in the discharge (spilling) of 100 or more barrels of liquid; however, discharges of such magnitude, if entirely contained within the facility firewall, may be reported only in writing pursuant to Section III. of this Notice;
- ▶ B. Equipment failures or other accidents which result in the venting of 500 or more MCF of gas;
- ▶ C. Any fire which consumes the volumes as specified in I.A. and I.B. above;
- ▶ D. Any spill, venting, or fire, regardless of the volume involved, which occurs in a sensitive area, e.g., areas such as parks, recreation sites, wildlife refuges, lakes, reservoirs, streams, and urban or suburban areas;
- ▶ E. Each accident which involves a fatal injury; and
- ▶ F. Every blowout (loss of control of any well) that occurs.

OSHA

- ▶ Recordable
 - ▶ Any work-related injury or illness that results in loss of consciousness, days away from work, restricted work, or transfer to another job.
 - ▶ Any work-related injury or illness requiring medical treatment beyond first aid.
 - ▶ Any work-related diagnosed case of cancer, chronic irreversible diseases, fractured or cracked bones or teeth, and punctured eardrums.
 - ▶ There are also special recording criteria for work-related cases involving: needlesticks and sharps injuries; medical removal; hearing loss; and tuberculosis.
- ▶ Reportable
 - ▶ Any work-related fatality.
 - ▶ Any In-patient hospitalization.
 - ▶ An amputation or loss of an eye.
- ▶ Employers must report any incident classified as reportable within 8 hours.



▶ Example Incidents

Tank Cleaning Fire

Incident Detail: A flash fire occurred on a tank while being prepared for cleaning. A static discharge or a spark was created by metal on metal contact at the tank manway.

- ▶ Response Steps
 - ▶ Call 911
 - ▶ Call to Company Operational Command Center
 - ▶ Initiate Internal Company Incident Response Procedure/Plan
 - ▶ Incident Contained (Fire was extinguished by fire department)
 - ▶ Notification to COGCC - Form 22 (within 6 hours)
 - ▶ Notification to BLM (Within 24 hours)
 - ▶ Notification to GarCo Liaison (Within 24 hours)
 - ▶ Notification to Landowner (Within 24 hours)
 - ▶ Clean-up/Repair
 - ▶ Taproot/Investigation
 - ▶ Lessons learned - Send out Operations/Hazard Alert
 - ▶ Corrective actions to prevent incident from happening in the future.



Spill to Water

Incident Detail: A produced water/condensate spill reaches a surface water.

- ▶ Response Steps
 - ▶ Call to Company Operational Command Center
 - ▶ Initiate Internal Company Incident Response Procedure/Plan
 - ▶ Incident Command Center established - Incident Commander appointed
 - ▶ Isolate Source - Start Containment
 - ▶ Deploy Spill Cleanup Material
 - ▶ Notification to NRC - (Immediately)
 - ▶ Notification to COGCC - (Immediate - Within 24 hours)
 - ▶ Notification to BLM -NTL3a - (Immediate - Within 24 hours)
 - ▶ Notification to GarCo Liaison (Immediate - Within 24 hours)
 - ▶ Notification to Landowner - (Immediate - Within 24 hours)
 - ▶ Clean-up/Repair/Remediation
 - ▶ Taproot/Investigation
 - ▶ Lessons learned - Send out Operations/Hazard Alert
 - ▶ Corrective actions are issued to prevent incident from happening in the future.




Injury

Incident Detail: Employee and/or contractor breaks a bone on the location.

► Response Steps

- Call to Company Operational Command Center
- Call 911 (if required)
- Initiate Internal Company Incident Response Procedure/Plan
- Secure Location
- Initiate CPR/First Aid
- Notification to COGCC - Form 22 (within 6 hours)
- Notification to GarCo - (Within 24 hours)
- Taproot/Investigation
- Lessons learned - Send out Operations/Hazard Alert
 - Corrective actions are issued to prevent incident from happening in the future.





Supporting

- ▶ Programs & Procedures

Site Safety Plan



PICEANCE
COMPLETIONS GROUP
Site Safety and Evacuation Plan

Revised 12/13/2018

Wellsite Supervisor(s): Trent Ray (970) 234-9301 or Ryan Tompkins 970-640-3294

Crew: Covenant Flowback Pad North Parachute WF A15 596

Nearest town: Parachute, CO Distance to nearest town: ~15Miles

GPS coordinates: Lat. 39.37°17.87'N Long. 108.08°57.02'W ELEVATION: 6,904'

From Parachute, CO Head 10.5miles North on CR 215 to Caerus Main Gate. go thru gate and turn leftgo .6 miles and turn Left onto West Fork, follow RD up for 4 mi to end of west fork and arrive at A15 Pad (pit on location).

COVENANT Supervisor: Connor Williams (970)-361-7899 Raido#s 22-390, 22-393

COVENANT Well testing Manager: Nick Collins (832)-963-7816

Nearest Hospitals: Grand River Health Medical Center (ER) Rifle, CO (970)-625-1510 ~40 miles
St. Mary's Hospital (ER) Grand Junction (970) 298-2273 ~70 miles

Utilize OCC (970) 285-2615, Garfield County Emergency Dispatch (970) 625-8095 or 911 emergency calls

Muster Location: Entrance to Location on North end follow uphill and pay attention to Wind direction.

Safe place for Care Flight to land: O10A Pad N 39.62' 55.44" W 108.15'45.19"

Secondary Escape: Safely exit the location, avoid hazards and meet as a group at designated muster point

- In case of an emergency (Injury, Accident, Fire, Gas Release, or Spill):
- In the event of H2S Release or Monitor Spike, please refer to H2S Emergency Response Flow chart
- NOTE: In Event H2S Team in Needed, Team is to gather @ (NPR Main guard gate) prior to be guided to location.**
- Make the OCC / 911 emergency call immediately if the situation requires (Call the county dispatch.)
OCC or County Dispatch will fulfill 911 duties: Fire, Ambulance/Flight for Life, and Sheriff.
 - NOTIFY On-site Wellsite Supervisor IMMEDIATELY
 - All personnel on location meet at designated meeting place (MUSTER POINT.) Determine that all personnel are accounted for, using the daily log in sheet.
 - If safe to do so, perform rescue operations and administer 1st aid.
 - If injured person can be safely moved, transport to the nearest hospital. If not, meet and guide the Ambulance/Care Flight to the pre-planned meeting place and lead them to the accident site.
 - Same applies for H2S Mitigation team, designate someone to meet them at pre-determined meeting point
 - Assign a designated communication person for phone communication and incident documentation.
 - If safe to do so, control the release and contain the spill.
 - Evacuate the location and surrounding area as needed.
 - Document all information, ie: time of incident, time of reporting, time of response, time any changes occurred w/ incident, description of incident, names of personnel involved, witnesses, estimated spill volumes, etc.
 - Inform Caerus Completion Supervision and EHS as soon as possible for all incidents.

Piceance Completion Supervision:

- Notify appropriate Emergency Response Agencies
- Keep phone open for communications w/ Emergency Responders and the scene of the incident.
- Notify appropriate Company Groups and Managers.

Ryan Tompkins	970-640-3294
Trent Ray	970-234-9301
Travis Kolisch	720-788-8707
Mike Mengers	405-881-9930
Carl Turnipseed	970-930-5057
Reed Koenek (Safety Dept.)	970-216-2557
Jake Janicek (Environmental)	970-778-2314
Gas Control / OCC	970-285-2615 Radio #22-615
Garfield County Emergency Dispatch	970-625-8095
Mesa County Emergency Dispatch	970-242-6707
Rio Blanco County Emergency Dispatch	970-878-9600
Grand River Medical Center (ER) (Rifle)	970-625-1510
Rangeley Hospital	970-675-5011
St. Mary's Hospital ER (Grand Junction)	970-298-2273
Care Flight (St. Mary's)	(1+) 800-332-4923

ERP/IRP Notification Procedures



Piceance – Emergency Notification Chart

FIRST RESPONDER

1. Evacuate: Account for all personnel
2. Call for help: Level 1 Emergency contact: Supervisor
Level 2&3 Emergencies contact: 9-1-1 (if required), OCC, and Supervisor
3. Secure the scene: Establish IC Command



INCIDENT COMMANDER			Operations Control Center (OCC): 970-285-2615 / Tait Radio 22-256		
Caerus company representative on location			SAFETY & HEALTH		ENVIRONMENTAL
			Reed Koencke W 970-285-2755 C 970-216-2557		Jake Janicke W 970-285-2720 C 970-778-2314
			EH&S MANAGER		
			Mike McKee W 720-880-6322 C 303-905-1463		
EMERGENCY MANAGER					
Drilling	Completions	Production	Construction	Facilities	Water
Steve Schmitz W 720-880-6412 C 303-330-5461	Cole Walton W 720-880-6325 C 720-656-8747	Dean Lawton W 970-285-2649 C 970-201-5417	Jessy Rippee W 970-285-2629 C 970-986-0734	Ed Dougherty W 970-285-2752 C 970-644-0379	Brock Hays W 970-285-2694 C 720-788-6924
Field Production Manager Carl Turnipseed W 970-285-2686 C 970-930-5057		Gathering Superintendent Kurt Kissner W 970-285-2931 C 970-250-9045		Water Superintendent Ryan Guldán W 970-285-2639 C 303-919-4350	
EMERGENCY MANAGEMENT TEAM					
GROUP 1 – STAND-BY CALL WHEN EMERGENCY REQUIRES ADDITIONAL SUPPORT					
SURFACE LAND		VP of Operations	Gathering Systems Manager		LEGAL
Terry Tracy W 970-285-9606 ext.102 C 970-734-7078	or Zane Lay W 970-285-2816 C 307-850-4918	Mike Rynearson W 720-880-6407 C 303-241-5432	John Benton W 720-880-6359 C 303-250-3809		Allison Woolston W 720-880-6367 C 520-465-0035
GROUP 2 – CALL ONLY IF SUPPORT REQUIRED					
MEDIA RELATIONS & CORP COMMUNICATIONS			FINANCE		
Allison Woolston W 720-880-6367 C 520-465-0035			Natasha Nightengale W 720-880-6415 C 720-988-9944		
CHIEF OPERATING OFFICER Matt Wurtzbacher		CHAIRMAN & CEO Dave Keyte		CHIEF FINANCIAL OFFICER Jeter Thomas	
TACTICAL SUPPORT TEAM					
AGENCY CONTACTS			EMERGENCY CONTACTS		
BLM (Grand Junction) 970-244-3050 BLM (Silt) 970-876-9000 BLM (Meeker) 970-878-3800 COGCC (Rifle) 970-625-2497 CDPHE 877-518-5608 National Response Cntr 800-424-8802 Federal OSHA 800-321-6742 Region 8 OSHA 720-264-6550 One-Call 800-922-1987 Pipeline Ref. 811			CO State Patrol 970-824-6501 Grand River Hospital (Rifle) 970-625-1510 Saint Mary's Hospital (GJ) 970-298-2273 Garfield County 970-625-8095 Mesa County 970-242-6707 Rio Blanco County 970-878-9600 Care Flight 800-332-4923 Wild Well Control 281-774-4700 EMS, Fire, Police 911		

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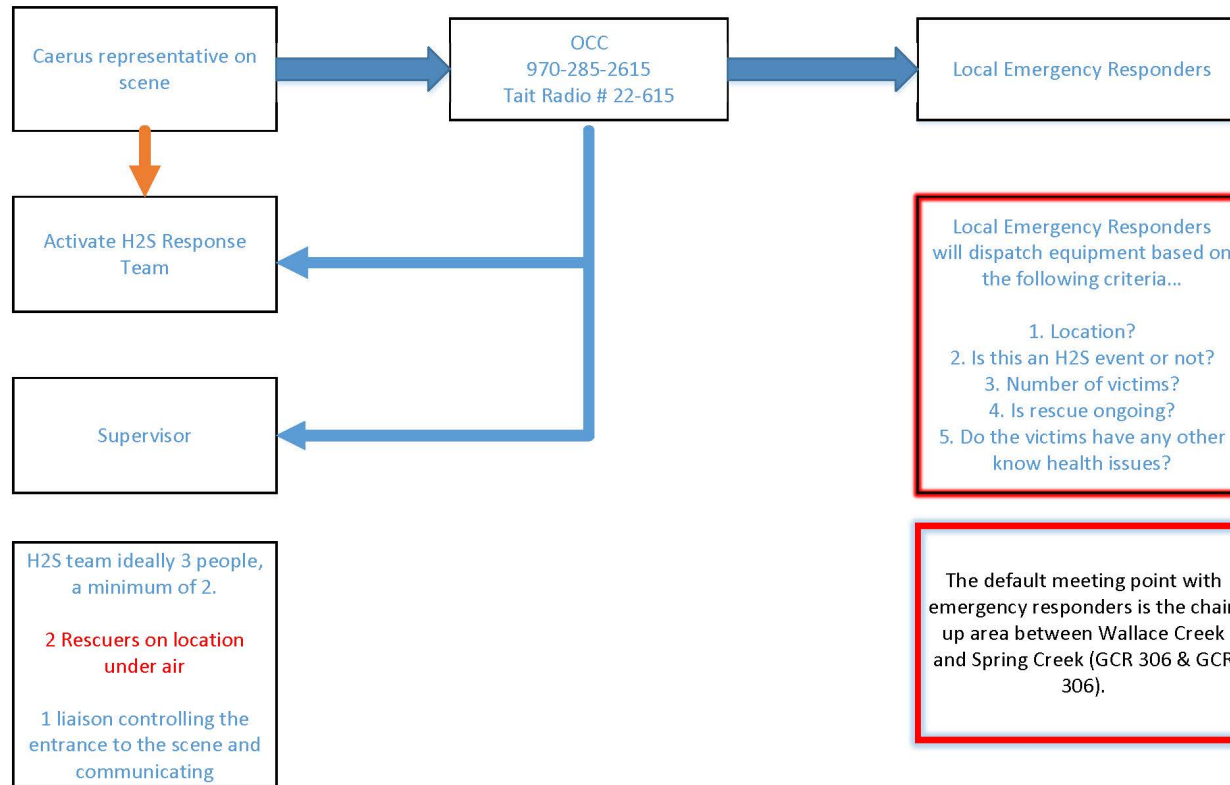
Emergency Level Chart

The highest Emergency Level that contains at least one element from the Criteria column is the Emergency Level for the Incident.	
Level 1 Emergency	
An incident that is limited to the location where it occurred, is under effective and immediate control, and has relatively minor impact to people, environment, or company assets, reputation, and business/ finances.	
Criteria	Examples
<ul style="list-style-type: none"> Does not threaten life Is not perceived to be a threat to the public Has brief or no media attention Has minor environmental impact Can be addressed by in-field personnel Generates company wide attention 	<ul style="list-style-type: none"> Injury requiring evacuation of injured parties Reportable spill confined to lease Property damage that compromises safe operations Weather conditions (e.g., tornado watch) that threaten personnel and operations Threat of social or political unrest, labor disputes, or acts of violence against personnel or operations
Level 2 Emergency	
Incident control has been compromised, imminent or near-term control is likely, and the incident has moderate impact to people, environment, or company assets, reputation and business/finances.	
Criteria	Examples
<ul style="list-style-type: none"> Potential threat to life Might jeopardize public health or safety Might have prolonged media attention Causes substantial reversible or short-term environmental damage Requires assistance by outside resources to control the incident 	<ul style="list-style-type: none"> Serious injury resulting in hospitalization Reportable spill that extends beyond the lease Facility fire, hazardous materials release, or significant property damage Imminent security threats, social or political unrest, and labor disputes that will impact personnel or operations Severe weather (e.g., tornado warning) which impacts personnel and/or operations Missing or unaccounted for vehicle or aircraft
Level 3 Emergency	
Incident control has been lost, imminent or near-term control cannot be established, and the incident has severe impact to people, environment, or company assets, reputation and business/finances.	
Criteria	Examples
<ul style="list-style-type: none"> Life-threatening conditions Jeopardizes public health or safety Has extensive media attention Causes irreversible or long-term environmental damage 	<ul style="list-style-type: none"> Incident resulting in multiple serious injuries or fatality Spill threatening municipal or private water supply Event causing public evacuation and/or significant environmental damage Act of terrorism, violence, social or political unrest that impacts personnel or operations Emergency events lasting more than one day

H2S Procedures

H2S Emergency Response Flow Chart

Begin all communications through this process by clearly stating "This is an H2S event/emergency."



CareFlight Coordination

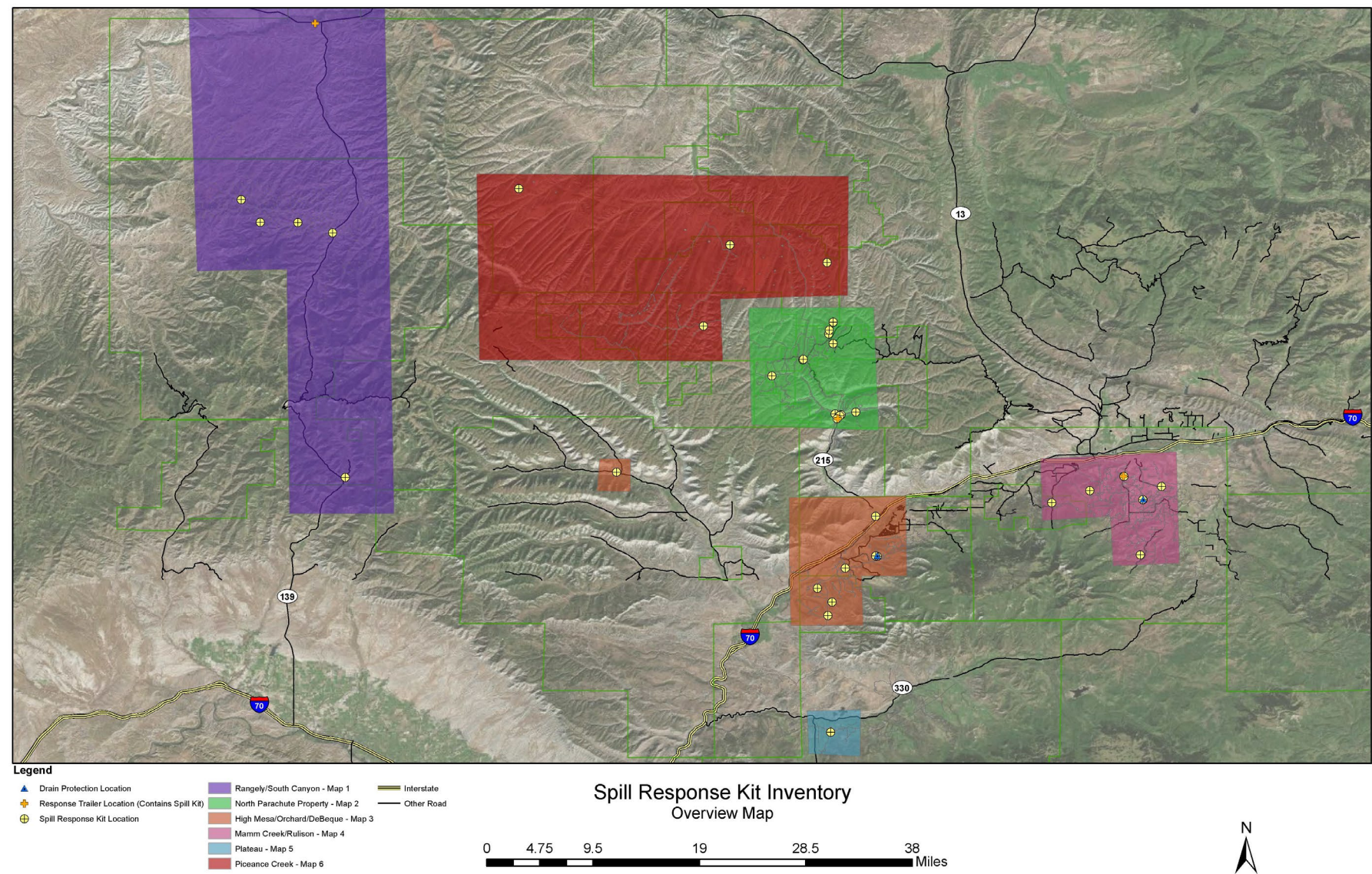




IRP/ERP Drills

- ▶ Annual Incident Response Planning
 - ▶ Table Tops
 - ▶ Mock Drills
 - ▶ Equipment Deployment
 - ▶ Training

Spill Trailer/Kit Practices



The background features abstract geometric shapes in various shades of green and orange. On the left, a solid green shape extends from the top. On the right, there are several overlapping, semi-transparent green and orange polygons that create a layered effect. The word "Questions" is centered in the white space between these shapes.

Questions