

Spill Prevention, Control, and Countermeasure Plan Red Mesa Gas Field Production Facility Marvel, Colorado

December, 2008

Prepared for:

Red Mesa Holding, LLC



SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN
Red Mesa Holdings, Red Mesa Gas Production Facility, Marvel, CO

August
2007



SPCC Plan – Red Mesa Gas Field Production Facility

Spill Response - Quick Reference

1	ENSURE ALL PERSONNEL ARE SAFE
2	CALL FOR EMERGENCY ASSISTANCE (FIRE DEPT, POLICE, ETC) IF NEEDED
3	INFORM <u>SUPERVISOR</u> THAT SPILL HAS OCCURRED
4	EVACUATE AND ISOLATE SPILL AREA
5	INVESTIGATE PERSONNEL INJURIES AND IMMEDIATE DANGERS
6	STOP THE SOURCE OF THE SPILL (IF POSSIBLE TO DO SO SAFELY)
7	OBTAIN RESPONSE EQUIPMENT AND PROTECTIVE EQUIPMENT
8	CONTAIN SPILL IF FEASIBLE AND SAFE TO DO SO
9	CLEAN UP SPILL
10	PLACE USED SPILL CLEANUP MATERIALS IN APPROPRIATE CONTAINERS
11	COMPLETE <u>SPILL/RELEASE REPORT FORM</u> (APPENDIX G)

Emergency Phone List

Production Manager – Rich Larson	W – 970-588-3302 C – 970-769-4841
SPCC Coordinator – Mark Napier	W – 970-588-3302 C – 970-759-7660
SPCC Coordinator Alternate – Garrett Vogel	C – 970-769-0105/7382 H – 970-588-3304
Red Mesa After Hours Contact – Mark Napier	W – 970-588-3302 C – 970-759-7660 H – 970-588-3716
National Response Center	800-424-8802 (24-Hour)
Colorado Spill Reporting Hotline	877-518-5608 (24-Hour)
LaPlata County	970-382-6007
Environmental Protection Agency Region VI Emergency Response Center	866-372-7745



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- B: Facility Diagrams
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 - B-3 Red Mesa Gas Field Map
- C: Oil Storage and Handling Areas
- D: Tank Truck Loading Procedures
- E: Facility Inspection Checklist
- F: Record of Dike Drainage
- G: Discharge Notification Procedures
Red Mesa Spill/Release Form
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- I: Professional Engineer Certifications
- J: Contingency Plan
- K. Field Office, Compressor Station, and Well-Site Figures



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SPCC Rule Cross-Reference (Onshore Production Facility)

SPCC Rule	Description of Section	Location in Plan	Page #
112.3(d)	Professional Engineer Certifications	Appendix I	I-1
112.3(e)	Location of SPCC Plan	Preface	xi
112.5	Plan Review and Amendments	Table 1: Record of Plan Review and Amendments	x
	Professional Engineer Certification for Technical Amendment	Appendix I	I-2
112.7	Management Approval	Preface	viii
112.7	Cross-Reference with SPCC Rule	Preface	v
112.7(a)(1) and 112.7(a)(2)	Conformance with requirements, deviations from Plan requirements	Section 1	1-5
112.7(a)(3)	General Information and Facility Diagram	Section 1	1-1
	Facility Diagrams	Appendix B	B-1
112.7(a)(3)(i)	Type of oil and storage capacity	Appendix C	C-1
112.7(b)	Type of Failure, Discharge Rate, and Direction of Flow	Appendix C	C-1
112.7(c) 112.9(c)	Tank Construction and Secondary Containment	Appendix C	C-1
112.7(a)(3)(iv)	Countermeasures for discharge discovery, response, and cleanup	Section 2-2	2-4
112.7(a)(3)(v)	Methods of disposal of recovered materials	Section 2.4	2-5
112.7(a)(3)(vi)	Contact list and phone numbers	Emergency Phone List	i
112.7(a)(3) and 112.7(a)(4)	Discharge Discovery and Reporting	Section 2.1	2-1
	Discharge Notification Procedures	Appendix G	G-2
	Red Mesa Spill/Release Report Form	Appendix G	G-4



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SPCC Rule	Description of Section	Location in Plan	Page #
112.7(a)(3) and 112.7(a)(4)	Spill Response – Quick Reference	Quick Reference Table	i
	Spill Mitigation Procedures	Section 2.2	2-4
112.7(b)	Potential Discharge Volume and Direction of Flow	Appendix C	C-1
112.7(c)	Containment and Diversionary Structures	Appendix C	C-1
112.7(d)	Practicability of Secondary Containment	Section 3.2.4	3-5
112.7(e)	Inspections, Tests, and Records	Section 3.4	3-6
	Facility Inspection Checklist	Appendix E	E-1
112.7(f)	Personnel, Training, and Discharge Prevention Procedures	Section 3.5	3-8
	Training Records	Training Records	Red Mesa Training Records
112.7(c)	Facility Tank Truck Loading	Section 1.5.2	1-5
	Tank Truck Loading Procedures	Appendix D	D-1
112.7(i)	Brittle Fracture Evaluation (not applicable as no field-erected aboveground storage tank exists at this facility)	Not Applicable	Not applicable
112.7(a)(1), 112.7(a)(2), and 112.7(j)	Conformance with Requirements	Section 1.7	1-5
112.9(b)	Oil Production Facility Drainage	Section 3.2.1	3-3
112.9(b)(1)	Requirements for Draining Containment Structures associated with Tank Batteries, Separation, and Treating Areas	Section 3.2.3	3-4
	Record of Dike Drainage	Appendix F	F-1
112.9(c)(1)	Production Equipment	Section 1.5.1	1-4
112.9(c)(2)	Secondary Containment for Bulk Storage Containers	Section 3.2.2	3-4



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SPCC Rule	Description of Section	Location in Plan	Page #
112.7(e) and 112.9(c)(3)	Inspections, Tests, and Records	Section 3.4	3-6
	Facility Inspection Checklist	Appendix E	E-1
112.9(c)(4)	Bulk Storage Container Overflow Protection	Section 3.3.1	3-6
112.9(d)(1)	Inspection of Transfer Operation Equipment	Section 3.3.2	3-6
112.9(d)(2)	Inspection of Saltwater Disposal System (not applicable to this facility)	Not applicable	Not applicable
112.9(d)(3)	Flowline Maintenance Program	Section 3.4.5	3-7



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Management Approval

40 CFR Part 112.7

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has the full approval of management with the authority to commit the necessary resources to implement the plan. The programs and procedures outlined in this plan will be implemented, and periodically reviewed and updated in accordance with 40 CFR Part 112, as amended.

Name of Management Representative:	Rich Larson
Signature:	
Date:	



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Plan Review and Amendment

40 CFR Part 112.5

This SPCC Plan will be amended whenever there is a change requiring a technical amendment such as a change in facility design, construction, demolition, storage capacity, operation, or maintenance which materially affects the potential for the discharge of oil and/or other regulated material.

In addition to the technical amendments above, a review and evaluation of this SPCC Plan is conducted at least once every five years from the original plan certification date or initial applicability date. As a result of the review/evaluation, this SPCC Plan will be amended, if necessary, within six months of the review in accordance with 40 CFR Part 112.5(b). Any associated implementation actions will be completed within six months of the plant amendment.

A registered professional engineer (PE) will certify each technical amendment to the plan, as described above, in accordance with 40 CFR 112.3(d). All plan PE certifications are contained in Appendix I.

Scheduled five-year reviews and plan amendments are recorded in Table 1. This table must be completed for each five-year review even if no amendment is made to the plan. Note for the five-year reviews, the table must include the reviewer's signature, thereby confirming the statement in the footnote at the bottom of the table.



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Table 1: Record of Plan Review and Amendments

Date	Reviewer (include signature for 5-yr reviews)	Review Type	PE Cert. Req'd?	Summary of Changes If a 5-yr review, will the SPCC Plan be amended? ^a
	Rich Larson	Initial Plan Review	Yes	Not applicable

^a For five-year review entries in the table above and by the reviewer’s signature; the reviewer confirms their name, the date, and whether an amendment is required as per the following statement required under 112.5(b):

“I have completed review and evaluation of this SPCC Plan on the date indicated and will amend the plan (if indicated as necessary) as a result.”



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Location of Plan

40 CFR Part 112.3(e)

A complete copy of this SPCC Plan is maintained at the Red Mesa Field Office located in Marvel, Colorado. Physical address is #86 County Road 133D.



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1.0 GENERAL FACILITY INFORMATION

40 CFR Part 112.7(a)(3)

The purpose of this Spill Prevention Control and Countermeasure (SPCC) Plan is to describe measures implemented by Red Mesa Holdings, LLC (Red Mesa) to prevent oil discharges from occurring, and to prepare Red Mesa to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge from the Red Mesa Gas Field should a discharge occur. The Red Mesa Gas Field (the facility) consists of all wells, flowlines, and gathering systems/equipment for handling produced gas and liquids from this production field. This SPCC Plan has been prepared and implemented in accordance with the SPCC requirements contained in 40 CFR part 112.

In addition to fulfilling requirements of 40 CFR part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with Red Mesa employees and contractors, as a guide on facility inspections, and as a resource during emergency response.

1.1 Company Information

Company Name: Red Mesa Holdings, LLC

Facility Name: Red Mesa Field and Production Facility

Type: Gas and oil production and gathering facility

Location: Location centered in Marvel, CO.
#86 County Road 133D

A site location map is provided as **Figure B-1** in Appendix B

River Drainage Basin: Drained via dry washes into tributaries of the La Plata River

Name and Address of Owner: Red Mesa Holdings, LLC
P.O. Box 9
Marvel, CO 81329



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The SPCC Coordinator and the SPCC Coordinator Alternate are responsible for coordinating and leading the spill response, including spill response training. Red Mesa field personnel are

responsible for implementing responses to spills. A list of contacts is included in Table 1-1 below.

1.2 Contact Information

The designated person accountable for overall oil spill prevention and response at the facility, also referred to as the facility’s “Response Coordinator” (RC), is the SPCC Coordinator or SPCC Coordinator Alternate with. 24-hour contact information is provided in Table 1-1.

Table 1-1: Facility Contact Information

Name	Title	Telephone	Address
Rich Larson	Production Manager	W – 970-588-3302 C – 970-769-4841	P.O. Box 9 Marvel, CO 81329
Mark Napier	SPCC Coordinator / Red Mesa Holdings, LLC	W – 970-588-3302 C – 970-759-7660	P.O. Box 9 Marvel, CO 81329
Garrett Vogel	SPCC Coordinator Alternate	C – 970-769-0105/7382	P.O. Box 9 Marvel, CO 81329

Red Mesa pumpers or contracted pumpers support field activities including performing regular examinations of the facility equipment, as described in Section 3.4 of this SPCC Plan.Red Mesa personnel regularly visit the facility to record production levels and perform other maintenance/inspection activities.

1.3 Facility Layout Diagrams

The Red Mesa Gas Field Production Facility (the facility) consists of all wells, flowlines, and gathering systems/equipment for handling produced gas and liquids from this production field. The field consists of gas wells and associated equipment and tankage. Figure B-1 in Appendix B shows a general location map for Red Mesa Gas Field. Figure B-2 is an area/drainage map showing the topography and location of the facility relative to waterways, roads, and inhabited areas. Figure B-3 is the Red Mesa Gas Field Map with the lease areas identified. Appendix K contains the site figures for the field office, compressor station, and wells that comprise the Red



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Mesa Gas Field Production Facility. These figures show the locations of oil handling areas and oil storage containers greater than 55 gallons in capacity.



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1.4 Facility Location and Operations

Figure B-1 shows the location of the Red Mesa Gas Field in Southwest Colorado. The field is located west south west of Durango, CO. The field is accessed off roads from State Highway 141.

A typical well head location includes the well head, a gas/liquid separator, a blow pit, a tank for oil or condensate storage and related piping. Gas and produced liquids (oil and water) flow from the well to the 2-phase separator via an underground flowline. Field gas is piped from the separator to the sales pipeline which has an intermediate compressor station. Intermediate drip tanks are also located along the gas pipelines. Produced water is routed from the separator to the blow pit tank and produced oil or condensate to the oil storage tank via under or-above ground flowlines. Produced liquids are loaded from the tanks to tanker trucks for removal.

The Red Mesa Gas Field is generally manned during daylight hours. Field operations personnel visit the wellheads regularly to ensure the proper functioning of wellhead equipment, storage tanks, flowlines, and separators. This includes performing equipment inspections and maintenance as needed.

1.5 Oil Storage and Handling

1.5.1 Production Equipment

40 CFR Part 112.9(c)(1)

Appendix C contains a list of oil storage, handling equipment, and transfer piping at each well head location. The produced liquid storage tanks (i.e., storage tanks, blow pit tanks, and drip tanks) are shop-built steel tanks or shop-built fiberglass reinforced plastic tanks. The shop-built steel tanks meet the American Petroleum Institute (API) tank construction standard or equivalent. The design and construction of the tanks is compatible with the liquids they contain and the temperature and pressure conditions of storage.

Other affected equipment present at the facility includes the API separators. In addition, several of the sites have small wellhead compressors. Appendix C lists all oil containers present at the facility with capacity of 55 gallons or more.

Frac pits and tanks may remain at the facility temporarily following completion of drilling and production readiness for the wells. The frac pits and tanks are otherwise addressed in the SPCC Plan prepared by the drilling contractor.



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1.5.2 Transfer Activities

The wells produce primarily natural gas, with associated produced liquids and water. The natural gas is separated from the oil and water at the separator. The produced water is then routed to the blowpit tank and the oil /condensate to the storage tank(s) for temporary storage prior to removal by tank truck.

Tank trucks transfer produced oil and produced water from the blow pit tanks and storage tanks to off-site locations. These trucks do not remain at the facility. Transfer operations are attended by the truck driver. Appendix D to this Plan summarizes the Tank Truck Loading Procedure at this facility.

1.6 Proximity to Navigable Waters

Figure B-2 in Appendix B shows the location of the facility relative to nearby waterways. The facility drains via dry washes into the LaPlata River, which is located approximately 2 miles west of the Red Mesa Gas Field. There are no perennial streams or rivers located within the Red Mesa Gas Field. Ephemeral flow may be present due to snow melt or summer storm surges.

In the event of an uncontrolled discharge (beyond secondary containment) from the well heads, flowlines, or well head tankage, liquid would follow the local topography and drainage of each well head location. Within the well field area, normally dry washes drain towards the LaPlata River.

Conformance with Requirements 40 CFR Part 112.7(a)(1), 112.7(a)(2), and 112.7(j)

This SPCC Plan has been prepared in accordance with the 40 CFR Part 112 and good engineering practices. In conforming to all applicable requirements of 40 CFR Part 112, no deviations are employed or claimed in the SPCC Plan unless noted as “equivalent environmental protection”. In accordance with 40 CFR Part 112.7, the table in the preface provides a cross-reference to all applicable requirements.

This facility will be in conformance with all applicable requirements under 40 CFR Part 112 through the implementation and maintenance of this SPCC Plan.

In addition, 40 CFR 112.7 requires that additional facilities, procedures, methods, or equipment not yet fully operational must be discussed in this SPCC Plan. This discussion must include details regarding installation and operational startup. Therefore, Appendix C includes activities that must be completed and the associated timelines.



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The state of Colorado has no additional specific requirements for preparation or implementation of SPCC plans.



2.0 SPILL RESPONSE AND REPORTING

40 CFR Part 110 and 40 CFR Part 112.7

2.1 Discharge Discovery and Reporting

40 CFR Part 112.7(a)(3) and 40 CFR Part 112.7(a)(4)

If an oil or oil product spill occurs, Red Mesa will follow the reporting procedures summarized in Appendix G. The summary table in Appendix G provides a list of agencies to be contacted with respect to different spill scenarios. The Red Mesa Spill/Release Report in Appendix G summarizes the information that must be provided when reporting a spill. A Spill Response Quick Reference and Emergency Phone List are contained in the preface of this SPCC Plan.

Discharges would typically be discovered during the regular examinations of the facility in accordance with procedures set forth in Section 3.4.1. In the event of an accident or spill at the facility and immediately after calling for any necessary emergency assistance from local fire or law enforcement authorities, Red Mesa personnel will contact the SPCC Coordinator. The SPCC Coordinator will address any further notification and/or reporting requirements.

This section provides guidance to determine whether a spill of oil or oil products is reportable. It addresses the initial verbal notification associated with a discharge of oil or oil products land or water (including a discharge to a surface water body that violates applicable water quality standards, or causes a film, sheen, or discoloration). This section also addresses written reporting requirements associated with spills exceeding minimum thresholds set by the federal and state governments.

Spills requiring notification and/or reporting include those that meet one of the following criteria:

- Leaks, spills and releases of any wastes or products from oilfield operations are required to be reported to La Plata County and the State of Colorado.

A Major Release shall be reported by giving both immediate verbal notice (within 24 hours) and timely written notice (within 10 days). A Major Release is: (a) an unauthorized release of a volume, excluding natural gases, in excess of 20 barrels; (b) an unauthorized release of any volume which: (i) results in a fire; (ii) will reach a water course; (iii) may with reasonable probability endanger public health; or (iv) results in substantial damage to property or the environment.

A Minor Release shall be reported by giving timely written notice (within 10 days). A Minor Release is an unauthorized release of a volume, greater than 5 barrels but not more than 20 barrels

- Releases resulting in EPA spill criteria stipulated in 40 CFR Part 110 (i.e., a spill that will violate state water quality standards, results in a film or sheen on the surface of water, or



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causes the deposition of a sludge or emulsion on the shoreline or beneath the surface of water)

2.1.1 Immediate Verbal Notification Requirements

40 CFR Part 110.6, 30 TAC §327.3(c)

The SPCC Coordinator or their designee will perform verbal notification to outside agencies as summarized below:

- 24 hour notification in the event of a Major Release, which is: (a) an unauthorized release in excess of 20 barrels; (b) an unauthorized release of any volume which: (i) results in a fire; (ii) will reach a water course; (iii) may with reasonable probability endanger public health
- 40 CFR Part 110 Discharge of Oil - The National Response Center will immediately be verbally notified within 24 hours of any discharge that reaches navigable waters, or threatens to reach navigable waters.

Red Mesa will immediately verbally notify the State of Colorado and LaPlata County authorities if a spill or discharge creates an imminent health threat.

Red Mesa will immediately verbally notify the Southern Ute Indian Tribe of any spill that may impact reservation land(s).

2.1.2 Follow-Up Written Notification Requirements

40 CFR Part 112.4(a), and 30 TAC §327.5(c)

The SPCC Coordinator or their designee will perform written reporting to outside agencies as summarized below.

- 10 day written notice to the COGCC in the event of a minor (greater than 5 bbl and less than 20 bbl) or a major (greater than 20 bbl) release.
- 40 CFR Part 112 Spill Prevention, Control, and Countermeasure – A single discharge of more than 1,000 gallons or two or more discharges greater than 42 gallons occurring within a twelve month period will be reported in writing to the EPA within 60 days of the discharge. A copy of this SPCC Plan, the completed Spill/Release Report, and a



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description of additional suggested preventative measures will be included with this report.

40 CFR Part 112.4(c) stipulates that the information submitted to the EPA also be transmitted to the appropriate state agencies in charge of oil pollution control activities.



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2.2 Spill Response Materials

40 CFR Part 112.7(a)(3)(iv) and (vi)

Spill response materials (e.g., shovels, absorbent, sand bags, etc) are provided in spill kits at the locations and/or are maintained in the pumper's trucks for immediate action on smaller spills.

2.3 Spill Mitigation Procedures

40 CFR Part 112.7(a)(3)(iv) and (vi), and 112.7(a)(4)

The following is a summary of actions that must be taken in the event of a discharge. It summarizes the distribution of responsibilities among individuals and describes procedures to follow in the event of a discharge. In the event of a discharge, the first priority is to shut off all ignition sources, followed by the containment, control, and mitigation of the discharge.

2.3.1 Shut Off Ignition Sources

If an explosion or fire hazard is identified by field personnel, shut off all ignition sources including motors, compressors, electrical circuits, and any open flames.

2.3.2 Stop Oil Flow

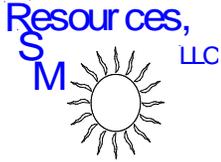
Appendix H contains equipment shut-off procedures to stop flow in instances of equipment leaks, ruptures, or failure. Field personnel should determine the source of the discharge, and if safe to do so, immediately shut off the source of the discharge. Shut in the well, if necessary.

2.3.3 Stop the Spread of Oil and Notify Supervisor

If safe to do so, field personnel must use resources available at the facility to stop the spilled material from spreading. Measures that may be implemented, depending on the location and size of the discharge, include placing sorbent material or other barriers in the path of the discharge (e.g., sand bags), or constructing earthen berms or trenches.

In the event of a significant discharge, field personnel must immediately contact the SPCC Coordinator who may obtain assistance from authorized company contractors and direct the response and cleanup activities. If necessary, notification procedures contained in Section 2.1 will be implemented.

Should a discharge reach surface water, only physical response and countermeasures should be employed, such as the construction of underflow dams, installation of hard boom and sorbent



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boom, use of sorbent pads, and use of vacuum trucks to recover oil and oily water from the water. If water flow is low in the water pathway, construction of an underflow dam downstream and ahead of the spill flow may be advantageous. Sorbent material and/or boom should be placed immediately downstream of the dam to recover any sheen from the water. If water flow is more substantial, floating booms and sorbent boom will be deployed. Vacuum trucks will then be utilized to remove oil and oily material from the water pathway banks and place them in bags for later disposal. After removal of contaminated vegetation, water pathway banks should be flushed with water to remove free oil and allow it to flow down to dams and other access points where it can be recovered by vacuum truck.

At no time shall any surfactants, dispersants, or other chemicals be used to remove oil from the water pathway.

2.3.4 Gather Spill Information

The SPCC Coordinator will ensure that the Spill/Release Report Form (contained in Appendix G) is filled out and that notifications have been made to the appropriate authorities. Information to be gathered in the event of a discharge is contained on that form.

2.3.5 Notify Agencies Verbally

Some notifications must be completed immediately upon discovering the discharge. It is important to immediately contact the SPCC Coordinator so that timely notifications can be made. Section 2.1 and Appendix G of this Plan describes the required notifications to government agencies. The SPCC Coordinator must also ensure that written notifications, if needed, are submitted to the appropriate agencies.

2.4 Disposal Plan

40 CFR Part 112.4(a)(3)(v)

If a contractor is used for cleanup efforts, the contractor is responsible for proper handling and disposal of any recovered product, contaminated soil, contaminated materials and equipment, decontamination solutions, sorbents, and spent chemicals collected during a response to a discharge incident.

If suitable, recovered product that can be recycled will be placed into the blow pit tank to be separated and recycled. Recovered product not deemed suitable for on-site recycling will be disposed off-site with the rest of the waste collected during the response efforts.



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If the facility responds to a discharge without involvement of a cleanup contractor, Red Mesa will contract a licensed transportation/disposal company to dispose of waste according to regulatory requirements. The SPCC Coordinator will characterize the waste and arrange for the use of certified waste containers.



3.0 SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PROVISIONS

40 CFR Part 112.7 and 112.9

3.1 Potential Discharge Volume and Direction of Flow

112.7(b)

Appendix C summarizes potential oil discharge scenarios. If unimpeded, oil would follow the site topography and potentially enter ephemeral stream beds or dry washes that may be subject to storm water runoff. There are no perennial streams in the area. On a regional scale, the area is located in the drainage basin for the San Juan River.

3.2 Containment and Diversionary Structures

40 CFR Part 112.7(a)(3)(iii) and 112.7(c)

The facility is configured to minimize the likelihood of a discharge reaching navigable waters. The following measures are provided:

- Individual or common pits and/or perimeter berms for the produced liquids storage tanks (i.e., blow pit tanks, storage tanks, and drip tanks). In the absence of pits and/or berms, any associated potential discharges will be addressed in a Contingency Plan (Appendix J).
- The separator, flowlines, and compressor lube oil tanks will have either individual perimeter berms or drainage ditches constructed, or alternatively will utilize the loading area berm or drainage ditch to catch any associated discharges or will be addressed in a Contingency Plan (Appendix J).
- Booms, sorbents, shovels, or other discharge response materials are available on-site or are maintained in the pumper truck/s as the pumpers are most likely to be the first to find a discharge.

These measures are described in more detail in the following sections.

3.2.1 Oil Production Facility Drainage

40 CFR Part 112.9(b)

Facility drainage from the common areas (e.g., exposed and buried flowlines, and tank truck loading/unloading area, and at some location, separators) is outside containment berms. Flow



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from the common area will be contained by perimeter drainage ditches and/or berms to be constructed by Red Mesa or will otherwise be addressed in a Contingency Plan. Any drainage ditches and/or berms will be visually examined by facility personnel on a regular basis during routine facility rounds and monthly inspections.

3.2.2 Secondary Containment for Bulk Storage Containers

40 CFR Part 112.9(c)(2)

In addition to the common area drainage configuration, the bulk storage containers (i.e., produced oil and water tanks) are placed inside an perimeter earthen berm and/or pit, or will otherwise be addressed in a Contingency Plan. The perimeter berms and/or pits provide secondary containment sufficient for the size of the largest tank, plus additional freeboard to contain precipitation. The berms and/or pits are capable of containing potential releases of oil from the storage tanks until the discharge can be detected and addressed by field operations personnel.

For wellhead compressors with lube oil tanks greater than 55 gallon capacity, the compressor lube oil tanks are placed inside perimeter earthen berms, inside secondary containment, or will otherwise be addressed in a Contingency Plan. The perimeter berms and secondary containments (e.g., stock tanks, box containments, other similar equipment, etc) will have capacity sufficient for the volume of the tank, plus additional freeboard to contain precipitation or be addressed in the contingency plan (Appendix J).

The tank perimeter berms and the compressor lube oil tank containment boxes will be visually examined by facility personnel on a regular basis during routine facility rounds and monthly inspections.

3.2.3 Draining of Containment Structures and Dikes

40 CFR Part 112.9(b)(1)

Appendix F contains a Record of Dike Drainage which includes the time, date, and name of the employee who performed the drainage. Drainage records are maintained with this SPCC Plan for a period of at least three years.

The bermed areas and drainage ditches are not equipped with valves for drainage. Due to the semi-arid nature of the area, precipitation normally evaporates. However in the event of precipitation accumulation to the point the containment capacity is negatively impacted, the bermed areas and drainage ditch are pumped out to the surrounding soil if no oil is present or pumped out and removed with produced waters if oil is present.



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The compressor lube oil tank secondary containment equipment may be equipped with a plug. But similar to the bermed areas, precipitation normally evaporates. The plug may be used to drain the containment box in the event of excess precipitation accumulation or the box may be pumped out.

All water is closely inspected by field operations personnel prior to draining water accumulation to ensure that no free oil is present (i.e., there is no sheen or discoloration upon the surface, or a sludge or emulsion deposit beneath the surface of the water). The plug (if used) for the containment equipment is opened and resealed following drainage under the responsible supervision of field operations personnel.

3.2.4 Practicability of Secondary Containment

40 CFR Part 112.7(d)

Flowlines adjacent to the storage tanks are located within the berm (when the tanks are bermed), and therefore have secondary containment. Any aboveground flowlines or buried flowlines that go from wells to a liquids gathering location or from production equipment (not inside a berm) to storage tanks, lack adequate secondary containment. In addition production equipment (e.g., separators, blow pit tanks, drip tanks, storage tanks, etc) and transfer operations located outside of berms/secondary containment also lack adequate secondary containment.

The installation of double-wall piping, berms, or other permanent structures (e.g., remote impoundment) may be impracticable at this facility due to the long distances involved and physical and/or road/fenceline right-of-way constraints. Additionally, such permanent structures would create land erosion and access problems for the landowner's current uses of the land (e.g., agricultural production, animal grazing, etc). Also, berms around the production pad may be impracticable as truck traffic over a perimeter berm would break the berm integrity.

Other measures listed under 40 CFR 112.7(c) such as the use of sorbents are impracticable as means of secondary containment since the volumes involved may exceed the sorbent capacity and the facility is attended for short periods of time.

As indicated in Appendix C, where additional berming/secondary containment for flowlines, separators, transfer activities, and tanks outside of bermed areas or other secondary containment is impracticable, Red Mesa will provide the following additional elements:

- A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged
- An Oil Spill Contingency Plan following the provisions of 40 CFR 109



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- Periodic integrity testing of containers, and periodic integrity and leak testing of associated valves/piping

3.3 Other Spill Prevention Measures

3.3.1 Bulk Storage Containers Overflow Prevention

40 CFR Part 112.9(c)(4)

The storage tanks are designed with a system to prevent discharge from overflow of tanks. The capacity of the produced oil and water storage tanks is sufficient to ensure that storage is adequate in the event where facility personnel are unable to perform the regular visits to unload the tanks or the pumper is delayed in stopping production. In addition and where multiple tanks are co-located, the tanks are connected with overflow equalizing lines to ensure that a full tank can overflow to an adjacent tank.

3.3.2 Transfer Operations System Inspections

40 CFR Part 112.9(d)(1) and (2)

All aboveground valves and piping associated with transfer operations are examined on a regular basis by the pumper and/or tank truck driver, as described in Section 3.4 of this Plan. The examination procedure includes observing flange joints, valve glands and bodies, drip pans, and pipe supports.

3.4 Inspections, Tests, and Records

40 CFR Part 112.7(e), 112.9(c)(3), and 112.9(d)(1)

This section outlines procedures for inspecting the facility equipment in accordance with SPCC requirements. Inspections are associated with containers, piping, containment areas, and equipment and are comprised of informal regular inspections, monthly scheduled inspections, and periodic condition inspections. Additional inspections are performed whenever an operation alert, malfunction, shell or deck leak, or potential bottom leak is reported following a scheduled inspection. Testing relates to the integrity of bulk storage containers, piping, and liquid level sensing devices. Recordkeeping as required for this SPCC Plan is also addressed in this section.

3.4.1 Regular Examinations

The facility is visited regularly by field operations personnel and is inspected for malfunctions, deterioration, operator errors, and any discharge that may be causing, or may lead to, spills of oil.



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The regular visual examination consists of a walk through of the wellhead, flowlines, separator, compressor skid and tank, and storage tanks. Field operations personnel check the well and production equipment for leaks and proper operation. They examine all aboveground valves, wellheads, fittings, gauges, flowline piping, and pumps to check for damage and leakage. They look for accumulation of water within the tank battery berms and other secondary containment structures and verify the associated containment integrity. The storage tanks are gauged on a regular basis and a produced liquids production report is maintained. All evidence of leakage, stained or discolored soil, containment accumulation, etc. are addressed and/or communicated to the SPCC Coordinator.

3.4.2 Monthly Inspections

Appendix E contains a checklist used during monthly inspections. As for the regular examinations, the monthly inspection covers the wellhead, flowlines, separator, and tanks. It also includes verifying the proper functioning of all detection devices, including high-level sensors on oil storage tanks. Tanks are inspected for signs of deterioration, leaks, or accumulation of oil inside the containment area, or other signs that maintenance or repairs are needed. The secondary containment area is checked for proper drainage, general conditions, evidence of oil, or signs of leakage. The monthly inspection also involves visually inspecting all aboveground valves and pipelines and noting the general condition of items such as flange joints, valve glands and bodies, loadout drip buckets, bleeder and gauge valves, locking of valves, and metal surfaces.

3.4.3 Brittle Fracture Evaluation

40 CFR Part 112.7(i)

At the present time, there are no records of any of the bulk storage containers at this site having been field-erected, and therefore no brittle fracture evaluation is required.

3.4.4 Flowline Maintenance Program

40 CFR Part 112.9(d)(3)

The facility's gathering lines and flowlines are configured, inspected monthly for leaks at connections and on each joint and for corrosion (pitting, flaking), and maintained to minimize the potential for a discharge as summarized Table 3-2. Records of any integrity inspections, leak tests, and part replacements are kept by Red Mesa for at least three years. Flowlines are pressure tested annually per COGCC Rule 1101 E (1).



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Table 3-2. Flowline Maintenance Program

Component	Measures/Activities
Configuration	<ul style="list-style-type: none"> ● Flowlines are identified on facility maps to facilitate access and inspection. Flowline maps indicate the location of shutdown devices and/or valves that may be used to isolate portions of the flowline. ● Aboveground flowlines and appurtenances can be visually observed for leakage, deterioration, or other damage.
Inspection	<ul style="list-style-type: none"> ● Lines are visually inspected for leaks and corrosion as part of monthly inspections. ● The buried portions of flowlines are visually observed for damage or condition whenever they are repaired, replaced, or otherwise exposed. ● Flowlines are pressure tested annually.
Maintenance	<ul style="list-style-type: none"> ● Any leak in a flowline or appurtenance is addressed by isolating, and repairing or replacing, the damaged portion.

3.4.5 Inspection Recordkeeping

Records of inspections are maintained for a minimum of three years.

3.5 Personnel Training and Discharge Prevention Procedures

40 CFR Part 112.7(f)

Employees that manage, maintain, or operate oil-handling equipment or potentially respond to emergencies related to them, will be familiar with the contents of the SPCC Plan. The SPCC Coordinator will be responsible for implementation of discharge prevention and emergency spill response activities. In addition, the SPCC Coordinator Alternate will be trained to assume the SPCC Coordinator’s responsibilities in the Coordinator’s absence.

3.5.1 Discharge Prevention Briefings

All Red Mesa oil-handling personnel receive annual training to assure understanding of the SPCC Plan, proper handling of oil products, and procedures to respond to oil discharges. Personnel are instructed in operation and maintenance of equipment to prevent the discharge of



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oil, and in applicable federal, state, and local pollution laws, rules, and regulations. This annual training includes:

- Discharge prevention measures highlighting known discharges or equipment failures, malfunctioning components, and any recently developed precautionary measures;
- A review of policies and procedures relating to spill prevention, control, cleanup, and reporting;
- Procedures for routine handling of products (e.g., loading, unloading, transfers);
- SPCC inspections and spill prevention procedures;
- Spill reporting procedures;
- Spill response; and
- Recovery, disposal, and treatment of spilled material.

The training ensures that all facility personnel understand the procedures described in this SPCC Plan and are informed of the requirements under applicable pollution control laws, rules and regulations.

3.5.2 Training Recordkeeping

Records of annual personnel training are maintained with other Red Mesa training records.



SPCC Plan – Red Mesa Gas Field Production Facility
APPENDIX A

Certification of Applicability of Substantial Harm Criteria
40 CFR Part 112.20(e), 40 CFR Part 112.20(f)(1)

Facility Name: **Red Mesa Gas Field Production Facility**

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
Yes No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?
Yes No

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes No

Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: _____
Name _____
(Please type or print)

Title: _____
Date: _____



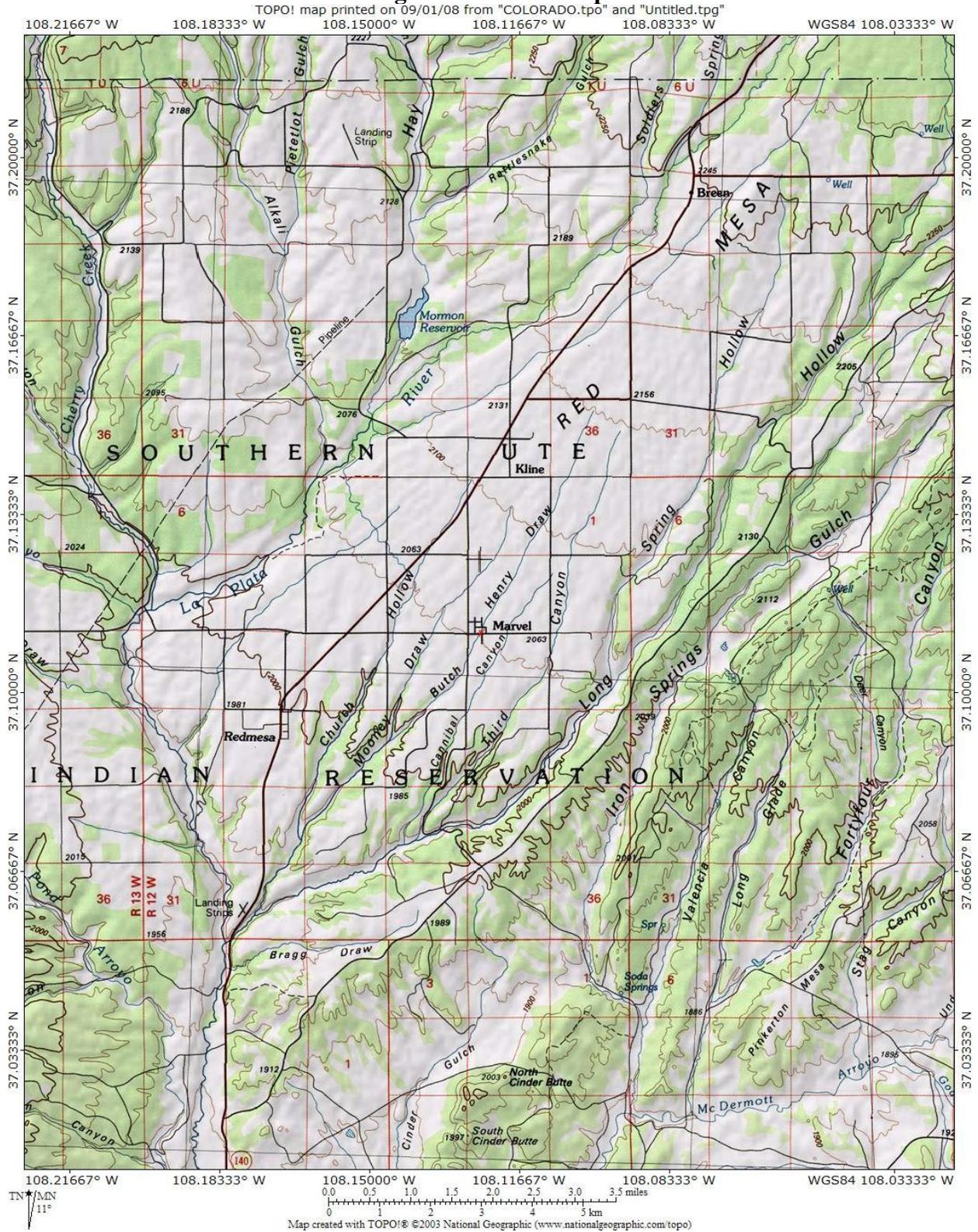
SPCC Plan – Red Mesa Gas Field Production Facility
APPENDIX B

Facility Diagrams



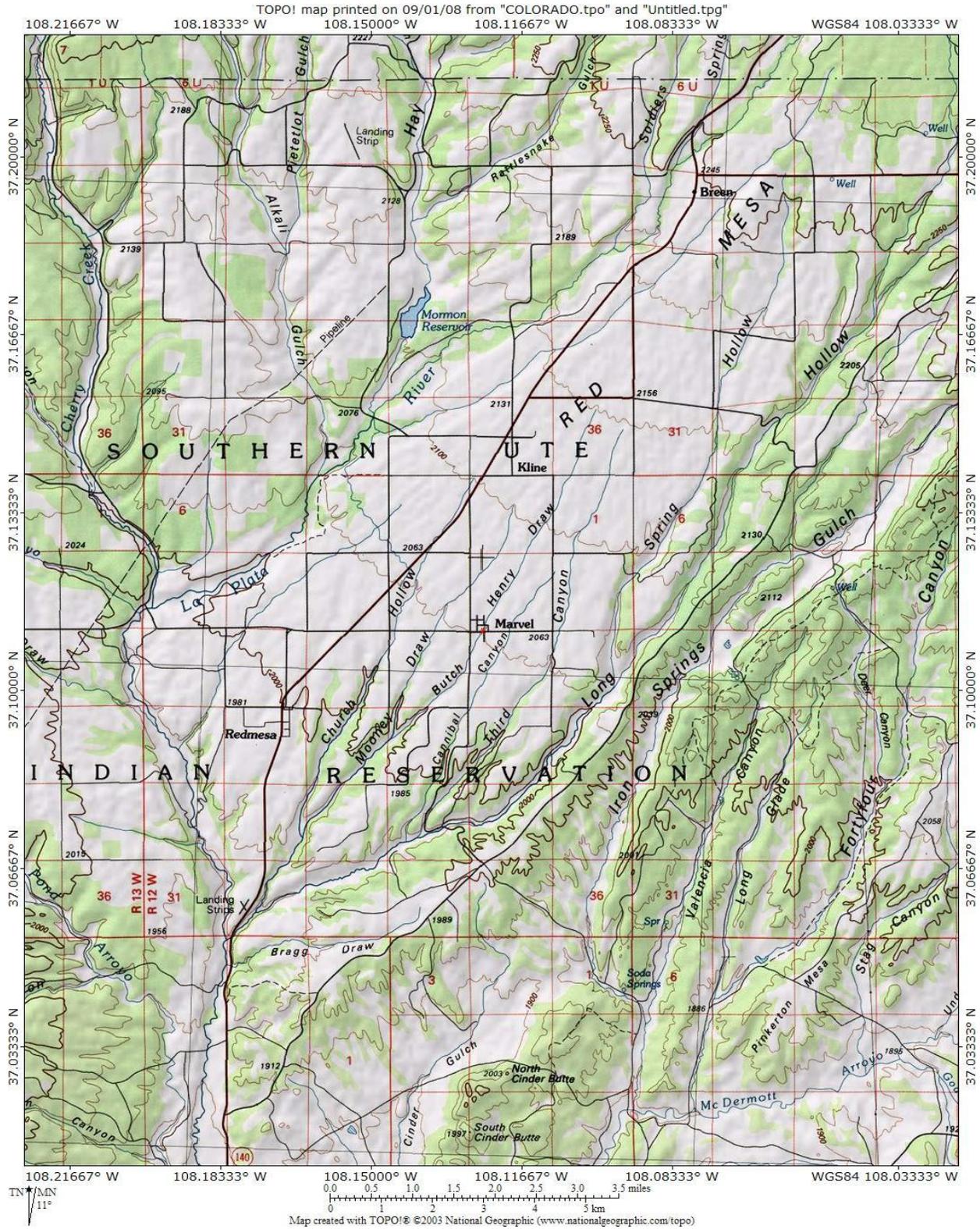
SPCC Plan – Red Mesa Gas Field Production Facility

Figure B-1: Area Map





SPCC Plan – Red Mesa Gas Field Production Facility
Figure B-2 Area/Drainage Map





SPCC Plan – Red Mesa Gas Field Production Facility

Figure B-3 Red Mesa Gas Field Map



SPCC Plan – Red Mesa Gas Field Production Facility
APPENDIX C

Oil Storage and Handling

Wells in Red Mesa Gas Field produce, on average produce less than 1 bbl of total fluid per day. As a result of the low liquid production rates, flowline hourly discharge rates are extremely small (on the order of less than 1 quart per hour). The figure of .05 barrels per hour has been used to represent a maximum discharge rate from a low spot in a flowline. It is unlikely that volumes totaling a reportable spill (> 5 bbls) would accumulate on the ground prior to discovery by the daily lease operator checks.



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APPENDIX D

Tank Truck Loading Procedures

To Load from Storage Tank to Tank Truck

- Exercise caution when maneuvering to avoid damage to piping or containment walls.
- Set tank truck brakes and/or block wheels. The driver must remain with the vehicle during the entire loading or unloading period.
- Make sure the tank being loaded is vented before connecting the loading line.
- Read the level indicator or visually inspect the receiving tank to be sure that sufficient space is available to receive material being transferred.
- Hook up load hose and open all appropriate valves from storage tank to trailer entry.
- When the pump is started, check to be sure there is no leakage at any of the connections or anywhere along the transfer lines. If a leak is present, immediately stop the pump, shut the valves, and repair the leak.
- When loading is complete, drain loading hose dry to storage tank.
- Verify that drain valves are closed before disconnecting loading lines.
- Ensure any drips from the hose drain into the drip buckets at the ends of the loadout lines.
- Disconnect loading hose completely, close load valve, plug and fasten securely.
- Close belly valve on trailer. Visually inspect the tank truck after loading and before departure for any discharges from the lowermost drain and all outlets. If a leak or discharge is observed, the valves must be tightened, adjusted, or replaced before departure to prevent discharge during transit
- Promptly clean up any spilled oil.



SPCC Plan – Red Mesa Gas Field Production Facility

APPENDIX E - Facility Inspection Checklist
SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Location: _____ Date: _____ Time: _____ Inspector: _____	✓ =Satisfactory NA=Not Applicable O =Repair or Adjustment Required C =See comment under Remarks/ Recommendations
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	Yes	No	Description & Comments (Note Tank/equipment ID)
Storage tanks and Separation Equipment			
<i>Tank surfaces show signs of leakage</i>			
<i>Tanks show signs of damage, rust, or deterioration</i>			
<i>Bolts, rivets or seams are damaged</i>			
<i>Aboveground tank supports are deteriorated or buckled</i>			
<i>Aboveground tank foundations have eroded or settled</i>			
<i>Gaskets are leaking</i>			
<i>Thief hatch and vent valve does not seal air tight</i>			
<i>Containment berm shows discoloration or stains</i>			
<i>Berm is breached or eroded or has vegetation or animal burrows</i>			
<i>Berm drainage valves are open/broken</i>			
<i>Equipment protectors, labels, or signs are missing</i>			
<i>Compressor skid containment shows signs of spillage</i>			
Piping/Flowlines and Related Equipment			
<i>Well head equipment is leaking or damaged.</i>			
<i>Valve seals or gaskets are leaking.</i>			
<i>Pipelines or supports are damaged or deteriorated.</i>			
<i>Buried pipelines are exposed, corroded, or leaking.</i>			
Transfer equipment			
<i>Loading/unloading lines are damaged or deteriorated.</i>			
<i>Connections are not capped or blank-flanged</i>			
<i>Secondary containment is damaged or stained</i>			
Response Kit Inventory			
<i>Discharge response material is missing or damaged or needs replacement</i>			

INSPECTION REMARKS/RECOMMENDATIONS (Continue on back if necessary):



SPCC Plan – Red Mesa Gas Field Production Facility



APPENDIX G

Discharge Notification Procedures

The Red Mesa Spill/Release Report Form is also contained in this Appendix. The person reporting a discharge must be prepared to provide the information contained on that form (to the extent possible at the time of notification). This appendix is also communicated to the pumper/s and any other Red Mesa personnel who would most likely discover any discharge.

Immediately after calling for any necessary emergency assistance from local fire or law enforcement authorities (911, if required), all spills, leaks, and releases are to be reported to the SPCC Coordinator:

Mark Napier –
W – 970-588-3302
C – 970-759-7660
H – 970-588-3716

The table below provides a summary of the thresholds that the SPCC Coordinator will follow for reporting spills to non-Red Mesa entities and what entities will be notified.

States	Thresholds	Substance	Agencies	Phone Numbers	Comments
State Reporting					
Colorado	5-20 bbl	Crude oil or lubricating oil	COGCC	877-518-5608 (24-Hour)	Minor spill requires written notification within 10 days.
	>20 bbl	Crude oil or lubricating oil	COGCC	877-518-5308 (24-Hour)	Major spill requires 24 hour notice and written notice within 10 days
LaPlata County	>5 bbl	Crude oil or lubricating oil	Laplata County LEPC	970-382-6007	Verbal notification to SW Region LEPC/emergency response.
Southern Ute Tribal Council	>5bbl	Crude oil or lubricating oil	Southern Ute Tribe	970-563-0135	Notification of any spill that enters reservation lands or may impact reservation resources.
Federal Reporting					
All States	Any discharge to surface water	oil	National Response Center	(800) 424-8802	Discharges that cause a sheen or discoloration on the surface or deposit a sludge or emulsion beneath the surface or on adjoining shorelines of surface water, or violate applicable water quality standards

Spill/Release Report

A. Date of Occurrence: _____ Time of Occurrence: _____ AM
PM

B. Date Reported: _____ Time Reported: _____ AM
PM

Location of Incident: _____ Contact Phone No.: _____

Evacuation Needed? YES NO

Danger or Threat Posed by Release:

Source and Cause of Incident:

Description of Resulting Damage and Affected Media (e.g., water, soil); Include Creeks (even if dry bed), stream, river, pond, lake, or ocean impacted:

Actions Taken to Stop, Remove, and Mitigate Effects of Release and Time to Control Incident:

Estimated Volumes and Type of Material / Description of Discharge to Each Media (land, dry water bodies, and water):

C. Volumes of Fluid Recovered:

D. Fatalities and/or Injuries:

Individuals and/or Agencies Notified:

Signed: _____ Date: _____

APPENDIX H

Equipment Shut-off Procedures

Source	Action
Manifold, transfer pumps or hose failure	Close the header/manifold or appropriate valve(s). Shut off transfer pumps.
Tank overflow	Ensure overflow equalizing lines are open such that tank can overflow to another tank or other tanks. Shut in the well supplying produced liquids to the tank battery. Close inlet valve to the storage tanks.
Tank failure	Divert flow to other tank/s. Shut in the well supplying produced liquids to the tank battery. Close inlet valve to the storage tanks.
Flowline rupture	Shut in the well supplying produced liquids to the flowline. Close nearest valve to the rupture site to stop the flow of liquid.
Flowline leak	Shut in the well supplying produced liquids to the flowline. Close nearest valve to the leak site to stop the flow of liquid from the leaking section.
Explosion or fire	Immediately evacuate personnel from the area until the danger is over. Immediately shut in wells if safe to do so. If possible, close all manifold valves. If the fire is small enough such that it is safe to do so, attempt to extinguish with fire extinguishers.
Equipment failure	Immediately close the nearest valve to stop the flow of liquid.

APPENDIX I

Professional Engineer Certifications Professional Engineer Certification for Initial Plan

40 CFR Part 112.3(d)

I hereby certify that:

- I am familiar with the provisions of 40 CFR Part 112 Oil Pollution Prevention;
- I, or my agent, has visited and examined the facility described herein;
- The plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the applicable requirements of 40 CFR Part 112;
- Procedures for required inspections and testing have been established; and
- The plan is adequate for the facility.

Facility Name & Address: _____ Red Mesa Gas Field Production Facility

Name of Professional Engineer (typed): _____ Richard K. Dembowski

Company: _____ RSM Resources, LLC.

Signature: _____

Certification Date: _____

PE Registration Number: _____

PE Registration State: _____ Colorado

Note: This page must be kept with the plan. Future technical amendments to the SPCC plan due to modifications at the facility must be certified via the Professional Engineer Certification for Plan Amendment form.

Professional Engineer Certification for Plan Amendment

40 CFR Part 112.5

I hereby certify that:

- I am familiar with the provisions of 40 CFR Part 112 Oil Pollution Prevention;
- I, or my agent, has visited and examined the changes described associated with the technical amendment below;
- The plan has been amended to include the technical amendment changes described below in accordance with good engineering practices, including consideration of applicable industry standards, and with the applicable requirements of 40 CFR Part 112;
- Procedures for required inspections and testing have been established as needed for the technical amendment; and
- The plan amendment is adequate for the change addressed by the technical amendment.

Description of Technical Amendment

Printed Name: _____

Signature: _____

Registration Date: _____

Registration No: _____

Registration State: _____

Note: This page must be kept with the plan. All technical amendments to the SPCC plan due to modifications at the facility must be certified via this Professional Engineer Certification for Plan Amendment form.

APPENDIX J
Contingency Plan

APPENDIX K

Field Office, Compressor Station, and Well-Site Figures