

# **Rule 908.b(11) Contingency Plan**

**Piceance Energy LLC  
Harrison Creek Water Treatment  
Facility – DAF Unit**

**OA Project No. 014-0465**

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# **EMERGENCY RESPONSE PLAN**

**March 2014**

Prepared For:

Piceance Basin Operations

Prepared By:

PICEANCE ENERGY, LLC  
1512 Larimer Street, Suite 1000  
Denver, CO 80202

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## **SECTION 1.0 INTRODUCTION**

### **1.1 Purpose**

Piceance Energy, LLC. (Piceance Energy) has prepared this Emergency Response Plan (ERP) in order to enable a coordinated and efficient response by Piceance Energy in the event of an emergency. This ERP details the notification and response procedures by which any such emergency shall be handled.

### **1.2 Applicability**

This procedure is applicable to all Piceance Energy facilities, including but not limited to, pipelines, stationary vessels, and transports that may contain E&P related materials or may cause injury to personnel or the public, or an adverse impact to property, the environment or any watershed.

An accident, disaster, spill, or unintentional release into the environment may give rise to a variety of reporting requirements. Reporting requirements will vary depending upon the emergency, what is spilled, the amount spilled and the time, location, and effects of the emergency. This procedure provides guidance for fulfilling the requirements of Piceance Energy or their designated representative and does not fulfill any Federal, State or local reporting requirements.

### **1.3 Plan Organization**

This plan is organized into three sections including this introduction. Section 2.0 presents Piceance Energy's response organization and coordination. The initial response actions to a spill or release are presented in Section 3.0.

## **SECTION 2.0**

### **RESPONSE ORGANIZATION AND COORDINATION**

#### **2.1 Piceance Energy Organization**

The reporting of accidents or spills is the responsibility of the initial responder. Awareness of this procedure by any potential initial responder is critical to ensure the proper implementation of this procedure. Immediate access to the *Emergency Notification List* must be made available to any and all appropriate parties including, but not limited to, all applicable Piceance Energy personnel, contractors, subcontractors, and applicable COGCC and County representatives. The *Emergency Notification Contact List* and *Emergency Response Procedures* have been incorporated into the appendix of this document.

#### **2.2 Response Training**

All applicable response personnel of Piceance Energy and selected response contractors will be trained in accordance with the provisions of this procedure. On-site annual refresher training will occur with all response personnel. Response procedures and materials will be evaluated annually and any changes incorporated within a revised *ERP* document. Revised procedures will be distributed to all applicable personnel, contractors and COGCC and County representatives.

Additional training of response personnel may apply pursuant OSHA Hazardous Waste Operations and Emergency Response Standard (29 CFR 1910.120). Discretion and responsibility of additional OSHA training are determined by company policy.

#### **2.3 Documentation**

Appropriate oral and/or written notification should be made based upon the situation and reporting requirements. On-site personnel should immediately address corrective action and/or countermeasures.

A written record of all pertinent information given to each applicable Agency and the Agency's response is to be retained by the environmental manager or designated representative of the responsible party. The information should include:

- Name, address, and location of the facility;
- Name, title and phone number of the person reporting the incident, the responsible party and the contact person;
- Location within the facility and/or outside of the facility (section, township and range);
- Nature of the emergency;
- Injuries with identification of the injured parties;
- Material spilled, and volume/quantity of the spill;
- Complete description of response, containment, and remedial efforts, including ultimate disposal or treatment alternatives;

- Bodies of water involved, the extent of actual and potential pollution or threat to surface water;
- A chronology of all events including: a complete description of circumstances causing the emergency, release, or spill, actions taken, and explanations;
- Any spill or release of a listed hazardous waste and/or a characteristic hazardous waste, as defined in 40 CFR Part 261;
- A description and estimate of any third party damages;
- Procedures, methods and precautions instituted to prevent a similar reoccurrence; and
- Other appropriate information for the particular emergency.

## **SECTION 3.0**

### **INITIAL RESPONSE ACTIONS**

There are a number of measures that can be taken to minimize the threat to human health and the environment when an emergency or spill of hazardous substances is first detected. The following measures should be considered as general guidelines and may not apply to all circumstances.

#### **3.1 Initial Contact**

If an emergency or spill endangers the public health or welfare through traffic hazard, explosion, fire, noxious gas, water contamination or other means, immediately refer to the *Emergency Notification List* for notifications. When making these initial notifications, personnel should attempt to provide, at a minimum, the following information:

- Name of caller and call-back number;
- The exact location and nature of the incident;
- The extent of personal injuries and damage; and
- The material involved and any hazard information.

#### **3.2 Human Safety**

Only trained personnel should approach a fire or spill. Individuals who first respond to an accident or spill should:

- Assess the scene for hazards;
- Avoid entering a hazardous area or direct contact with spilled material;
- Avoid inhalation of any gases, fumes, vapors and smoke;
- Move and keep people away from the incident scene. Contact law enforcement authorities for assistance, if necessary;
- Attempts to determine and remove all ignition sources without unnecessarily endangering life;
- Assess the situation with regard to injuries; and
- Contact the designated first contacts or alternates as illustrated in the *Emergency Notification List*.

#### **3.3 Hazard Identification**

One of the most important aspects of the initial response activities is the identification of any hazards involved. Members of the response team should make this assessment with the assistance of the responsible party or operations personnel. Under no circumstances should hazardous substance identification be attempted without adequate personal protective equipment and without exercising extreme caution, please refer to *Emergency Response Procedures* (appendix).



### **3.4 Mitigation Measures**

Initial response actions should include actions by trained personnel to control any ongoing hazards, and shut off the source of any spill or discharge, and to contain and mitigate the consequences of the spill.

#### **3.4.1 Containment of Spills on Land**

Natural avenues of migration such as streams, waterways, ditches, and natural gullies should be followed on foot to determine extent of migration and impacted avenues. Containment facilities should be constructed if any impacts are identified. A field-constructed type of containment device is an earthen dam. Piling up earth can make a dam with a bulldozer, backhoe, or other earth-moving equipment. Natural dry ditches can be blocked with compacted earth (dam) and used as a storage pond into which a spill can be directed. Spills on paved or hard (frozen) surfaces can be deflected into such ditches or ponds with sandbag barriers. The dams act to stop the uncontrolled flow of product and create a pool for easier recovery.

In order to prevent the infiltration of the released product into the subsurface or leaching into the ground water, plastic sheeting or other non-porous material may be used to line the dam.

#### **3.4.2 Containment of Spills in Shallow Water**

Spill booms, straw fences, and or flume dams are types of spill containment devices that can be used to contain spills in shallow waters. The type of containment selected will depend on the site-specific conditions encountered and materials readily available.

Spill booms may be used if the water is deep enough to allow free flow of water under the boom. If used, the booms will be set at an angle to the flow of the stream and skimmer pits should be dug to catch the contaminant as it moves downstream.

A straw fence may be constructed using chicken wire or snow fence staked at an angle to the flow of the stream. Straw bales should be broken into pieces about two-feet square by eight to ten-inches thick and stacked vertically. This provides protection for a long time, prevents loose impacted straw from working downstream, and facilitates changing saturated straw for fresh straw. A straw fence should be built at an angle to the shore, with a pit or sump at the shore to skim the oil.

An underflow dam (or flume dam) may be built to contain the product or to protect against the further spread of the spill in the event of rain. The dam diverts the water through a conduit of pipe (or pipes) placed roughly parallel to the direction of the water flow. The pipes are installed so that the upstream end is lower than the downstream end. The stream is blocked by bulldozing earth across the pipes and packing the dirt down. The pipes allow water to pass through the flume, but retain the product behind the dam.

### **3.4.3 Containment of Spills in Deep Water**

A containment boom is the best method of confining a spill in deep water. These may be of the commercial variety or may be made from poles, logs, or other types of floating devices.

The placement of the boom on a flowing stream or river is critical. The boom should be placed at an angle to the shoreline to channel the product to shore. The greater the velocity of the flow, the greater the angle should be on the boom. Under no circumstances should the boom be placed in a loop configuration. This will channel the product to the center of the loop and under the boom. Skimmer pits should be dug at the downstream end of the boom to retrieve the product out of the channel.

### **3.4.4 Recovery of Spills on Land**

Product trapped in containment devices should be collected by a vacuum truck and disposed of at the closest terminal or approved disposal facility. Residual thin layers of product can be cleaned up using sorbents, emulsifying agents, or bioremediation techniques. Prior to applying emulsifying agents or implementing bioremediation techniques, the approval of the applicable regulatory agencies is required.

## **3.5 Response Materials**

Response personnel will be properly trained on the use and location of response equipment. Detailed information on the location of response equipment is contained in the *Emergency Response Procedures* appendix.

## **APPENDIX**

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# **PICEANCE ENERGY, LLC**

## **Emergency Response Procedures Vega/N. Vega/Buzzard Creek Operations Area**

### **WRITTEN PROGRAM**

#### **PURPOSE**

The goals of these emergency response procedures are, in order of priority, to protect the lives and health of Piceance Energy, LLC (Piceance Energy) employees, contractors, and the general public, and to protect and minimize damage to property, wildlife, and the environment in the event of an emergency.

#### **PRIORITIES**

The objectives of this plan are, in order of importance:

- Safely respond – Stage response in a safe location upwind and uphill from hazards;
- Isolate and control access - Evacuate and account for all employees and visitors;
- Notify - Contact appropriate local emergency service organizations;
- Command - Assemble the company's Emergency Response Team (ERT) for implementation of the response plan;
- Identify hazards – Observe scene, check placards, papers, site diagrams;
- Develop action plan – Write action plan and brief response team;
- Select protective equipment – Select engineering controls, PPE and monitoring equipment based on identified hazards;
- Control hazards – Remove ignition sources, consider containment options;
- Take protective action – Consider evacuation/shelter in place options, maintain safety zones, prevent further property and environmental damage;
- Decontaminate – Perform cleanup and salvage as needed;
- Dispose of contaminated materials – Place contaminated material in approved location to await disposal approval;
- Terminate – End emergency action, evaluate equipment, debrief personnel;
- Evaluate medical exposure – Document personnel exposure, evaluate exposed personnel;
- Evaluate response - Conduct post-incident critique and evaluation;
- Document - File any applicable reports with regulatory agencies.

#### **RESPONSIBILITIES**

##### **Facility Management**

- Evaluate the hazards expected based on past experience and general knowledge to plan and develop Emergency Response Plan specifics;
- Provide training to all employees for their roles in all emergency plans;
- Conduct drills to practice response to emergency situations;
- Conduct hazard communication training;

- All other activities necessary to the development and implementation of an effective Emergency Response Plan;
- Make emergency response team assignments.

#### **40-Hour HAZMAT-Trained Personnel**

- Assist in the training of emergency response teams;
- Assume active positions on the response teams.

#### **EHS Coordinator**

Provides assistance in developing and carrying out emergency response plans.

- Maintain sufficient inventory of emergency response equipment;
- Ensure maintenance and inspection of emergency response equipment;
- Help train emergency response team members.

#### **TRAINING**

Piceance Energy will train all employees on these procedures. New employees will be trained upon hiring, and re-trained any time the employee's responsibilities under the plan change or whenever the plan or procedures change. The company will provide copies of all emergency response plans and procedures to be kept in employee handbooks and operation manuals, and will post copies in field offices and guard stations.

The company also will designate and train a sufficient number of employees to assist in the safe and orderly evacuation of employees and visitors. These employees will be trained and re-trained as needed. Training will cover:

- Emergency reporting;
- Evacuation routes;
- Alarm systems;
- Specific assigned duties.

Periodic drills will be held to ensure that all employees know the appropriate action to take in case of an emergency. The company will provide additional training and drills for employees with specific emergency-response duties; and invite local emergency service units to participate in training whenever possible.

#### **EMERGENCY RESPONSE PROCEDURES**

#### **INCIDENT REPORTING**

##### **Management Notification**

If an emergency, or situation that could become an emergency, occurs, inform management immediately. The Piceance Energy EHS Coordinator will maintain an up-to-date *Emergency Notification List*.

##### **Emergency Response Team Notification**

The radio system, or direct supervisory contact can be used to notify the Emergency Response Team of emergency situations in the field.

### **Employee Notification**

The radio system, or direct supervisory contact can be used to notify employees of emergency situations in the field.

### **External Notification**

Call **911** to contact the local fire or police department, emergency medical service or other emergency-response units.

### **Corporate Notification**

Contact the Piceance Energy public relations department if media coverage of the situation is expected.

Also, notify the corporate office as soon as possible of property damages, theft, or cargo losses.

The following corporate officials are to be contacted:

**Piceance Energy EHS Coordinator:**  
**TBD**

office:  
mobile:

**Regulatory Compliance Manager:**  
**Wayne Bankert**

office: 970-812-5310  
mobile: 970-985-5383

**Production Superintendent:**  
**Eric Lane: North**  
**Milt Johnson: South**

office: 970-812-5313; mobile: 970-640-9172  
office: 970-487-3892; mobile: 970-230-1011

**VP Engineering & Operations:**  
**Robert G. Hea**

office: 303-339-4925  
mobile: 303-842-4982

### **EVACUATION PROCEDURES**

After the senior manager on the scene determines that evacuation is necessary, the evacuation instructions will be issued over the radio systems. Specific responsibilities are as follows:

#### **Production Supervisors**

- Lead employees from work areas when evacuation is ordered;
- Assist any employees with disabilities;
- Escort employees to the appropriate Designated Assembly Area;
- Account for all employees upon reaching the designated assembly area;
- Notify human resources of any employee not accounted for;
- Ensure that employees stay in the assembly area.

## **FIRE FIGHTING**

No employee shall fight a fire that is beyond the incipient stage (able to be put out with a fire extinguisher), enter if the building is on fire to conduct search and rescue, or provide advanced medical care and treatment. These situations must be left to emergency services professionals, who have the necessary training, equipment, and experience.

## **LOCATION**

Emergency response equipment shall be located in accessible locations as close to assembly areas and field access points as is reasonably possible. Emergency response dispatchers may require directions to field facilities and assembly areas, as well as coordinates of key locations such as helicopter landing sites. A *Roads and Pads Map* is included in this Appendix.

## **RESPONSE EQUIPMENT**

Response equipment will be located and secured at the Vega Guard Station and at the Harrison Creek Guard Station. The response equipment consists of two Spill Response Trailers. Notify the Piceance Energy EHS Coordinator as soon as possible of any supplies used, so that the trailers can be quickly re-supplied. The trailers contain the following:

- 3 or 4 Spill Response Kits/Drums. These typically include the following in a 95-gallon overpack drum:
  - 18"x18" sorbent pads
  - Sorbent pillows
  - 3"x4' sorbent socks
  - 3"x8' sorbent socks
  - PPE (goggles, gloves, Tyvek suits)
  - Disposal bags
  - Hazmat guide book
- 2 empty 55-gallon drums with lids for collection of contaminated soil or other materials
- 10 empty five gallon buckets with lids
- 3 shovels of various types (spade, flat scoop, etc.)
- 3" x 10' sorbent socks/booms
- 18" x 50' or 18" x 100' river booms
- More sorbent pads & pillows
- Straw rolls & straw bales
- Roll of silt fencing
- Roll of chicken wire-type fencing
- Roll of safety fencing
- 4 tarps of various sizes, including 3 large sizes (i.e. 10' x 20')
- Rolls of 4 mil plastic sheeting (visqueen)
- Portable/trash pump
- Wood stakes



- Fence posts and fence post driver
- Rope
- Several rolls of duct tape
- Bailing wire and twine
- Barrier tape
- Several bags of granular absorbent material
- Traffic cones and traffic control signs
- Bow saw or hatchet
- Field notebooks & permanent ink pens
- Emergency phone number list
- Fire extinguishers
- First-aid kits
- Basic tool kit (tool box with pliers, hammers, adjustable wrenches, screwdrivers, etc.)

### **Harrison Creek Guard Station**

The Harrison Creek Guard Station is the designated assembly location for North Vega, Piceance Energy Vega (Green Acres) Compressor Station, MVS Compressor Station, and eastern Buzzard Creek field operations. The guard station at 69649 Highway 330, is located approximately 12 miles east of the town of Collbran on Colorado State Highway 330 East, and ¼ mile south on Harrison Creek Road across the Buzzard Creek bridge, in the northeast quarter of the southeast quarter of Section 15, Township 9S, Range 93W at N39.27458°, W107.74927°. The Harrison Creek gate guard has current maps of the area, and will provide directions to specific locations within the North Vega and eastern Buzzard Creek fields as needed.

### **Vega Pad 17**

Vega Pad 17 is the designated assembly location for Vega field operations. Pad 17 is located approximately 6 miles east of the town of Collbran on Colorado State Highway 330 East, and approximately 6 miles southeast on 64.6 (Vega Dam) Road past Vega Reservoir, at the intersection with Parkview Drive, in the northeast quarter of the southwest quarter of Section 4, Township 10S, Range 93 West at N39.21899°, W107.77879°. The guard at the Vega Guard Station, located approximately ½ mile north of Pad 17 on 64.6 Road at N39.22864°, W107.76979° has current maps of the area, and will provide directions to specific locations within the Vega field as needed.

### **Buzzard Creek Compressor Station**

The Buzzard Creek Compressor Station is the designated assembly location for west Buzzard Creek field operations. The compressor station is located approximately 10 miles east of the town of Collbran on Colorado State Highway 330 East, and 1/4 mile north on a private access road, in the southeast quarter of the southeast quarter of Section 16, Township 9S, Range 93 W at N39.27251°, W107.76848°. The facility is un-manned, but the Harrison Creek gate guard has current maps of the area, and will provide directions to specific locations within Buzzard Creek field as needed.

***PICEANCE ENERGY, LLC***  
**Emergency Response Plan**  
**Emergency Notification List**

<b>Emergency:</b>	911
<b>Poison Control:</b>	800-222-1222
<b>Piceance EHS Coordinator:</b>	office:
<b>TBD</b>	mobile:
<b>Regulatory and Environmental:</b>	office: 970-812-5310
<b>Wayne P. Bankert</b>	mobile: 970-985-5383
<b>Production Superintendent:</b>	
<b>Eric Lane: North</b>	mobile: 970-640-9172 O: 970-812-5313
<b>Milt Johnson: South</b>	mobile: 970-230-1011 O: 970-487-3892
<b>VP Engineering &amp; Operations:</b>	office: 303-339-4925
<b>Robert G. Hea</b>	mobile: 303-842-4982
<b>Non-Emergency:</b>	303-339-4300

## COLLBRAN, COLORADO

Report any **work related injuries** to Human Resources. Call if you need assistance finding a physician who handles workers' comp claims.

If your injury is an **EMERGENCY**, immediately visit an emergency room. Medical facilities with emergency care in your area are listed below.

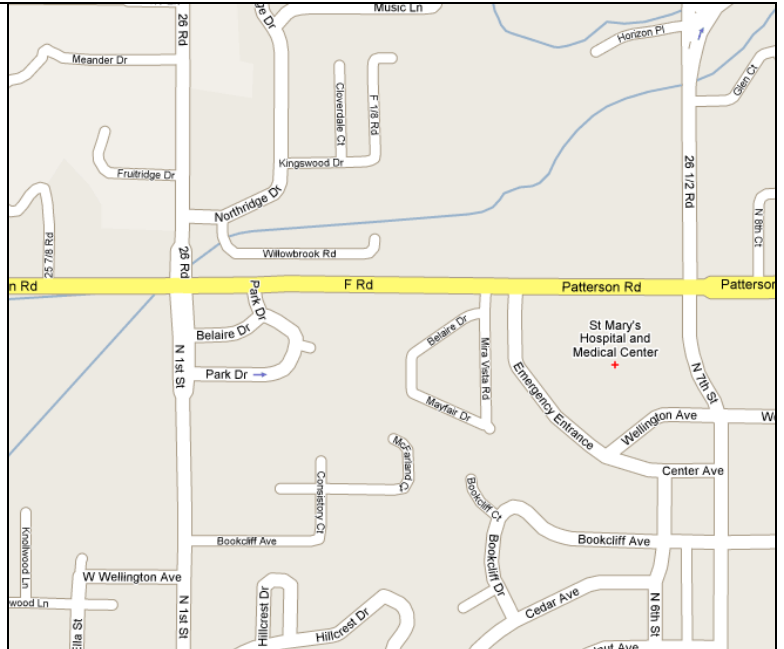


[St. Mary's Hospital & Regional Medical Center](#)

2635 North 7th Street Grand Junction, CO 81502  
970.244.CARE (2273)  
1.800.458.3888

Emergency Department  
St. Mary's Hospital  
Main Floor Entrance 4  
970.244.2551

CareFlight Air Ambulance  
Helicopter and Fixed Wing  
1.800.332.4923



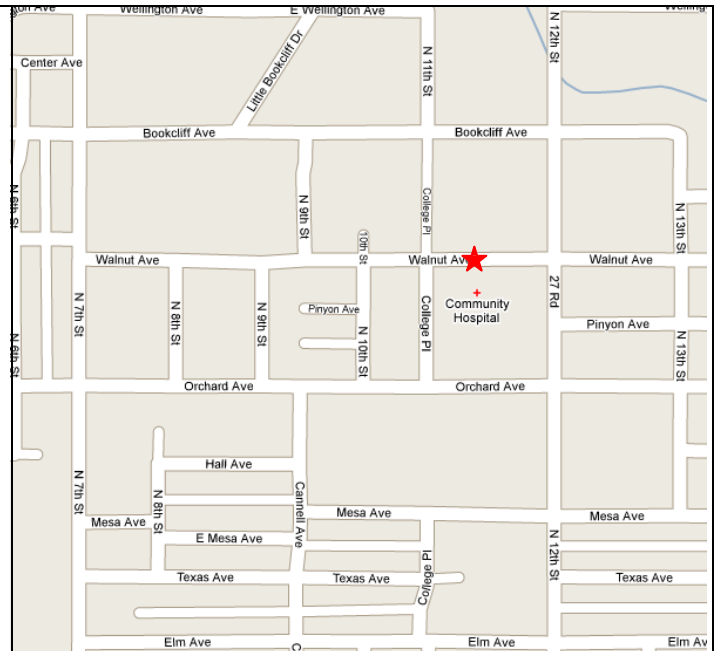
St Mary's Hospital & Regional Med Center  
5812 Highway 330, Collbran, CO 81624  
970.487.3258



[Community Hospital](#)

2021 N. 12th St.  
Grand Junction, CO 81501  
970.242.0920  
800.621.0926

The emergency room is on Walnut between College Place  
and N 12<sup>th</sup> Street.



[Plateau Valley Medical Clinic](#)

970.487.3565  
Office Hours:  
M,W-F 8:00-5:00  
Tuesdays 7:00-5:00  
After Hours: 970-248-0222

Business Office  
970.487.0211  
Doctors are on call 24 hours/day, 7 days/week



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