

- All Verdad employees and contractors are trained on spill procedures at hiring and on boarding.
- Spill prevention and reporting requirement training occurs annually with Verdad Operation teams.
- Contractors undergo periodic contractor training and audits where spill prevention and reporting requirements are covered.
- Spill incidents are discussed and lessons learned are shared at monthly safety meetings.

Procedures

- Any spill discovered or caused shall be immediately stopped at the source if on going and safe to do so.
- Any spill discovered or caused shall be immediately cleaned up and properly disposed of.
- Spill volume shall be determined. If unable to determine spill size call your supervisor (employee) or Verdad hiring manager (contractor) and Verdad EH&S staff.
- If spill is greater than 1 BBL (or 10 gal. of refined product or chemical) call your supervisor (employee) or Verdad hiring manager (contractor) and Verdad EH&S staff.
- Verdad EH&S staff will determine if spill is reportable.
- Verdad EH&S staff will notify the Director of EHS&R to submit the 24 Hr COGCC reporting and notification requirements to local governments, surface owners and CPW if applicable.
- If the Director is unavailable the EH&S Field Manager will report the spill and make notifications.
- Director of EHS&R will direct the cleanup follow through, records collection, and submit subsequent reporting and request for closure or conversion to a remediation project, form 27.

Changes to Spill Reporting and Notification Procedures in response to Warning Letter #403377537

- Director of EHS&S and Field EH&S Manager reviewed COGCC 912 Rules to ensure full understanding and future compliance, particularly rule 912.b.(1)E as it relates to 913.c.(9).