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**Spill Prevention, Control and Countermeasure (SPCC) Plan**

$PREPARED\_FOR$

$IMAGE1$

|  |  |
| --- | --- |
| W$LAT$° | N$LON$° |

**Prepared By:**

|  |  |  |  |
| --- | --- | --- | --- |
| RL Hilbun P.E. | Scientific Environmental Engineering | Scientific Environmental Engineering | RL Hilbun P.E. |
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Table of Contents

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# Introduction

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|  |
| **Purpose** |
| The purpose of this Spill Prevention, Control and Countermeasure (SPCC) Plan is to outline and describe the preventative measures implemented by Oklahoma. This SPCC Plan also serves as a guide, reference tool, and material of record to ensure an efficient, safe, and effective response program to mitigate the impacts of a discharge. This SPCC has been prepared in accordance with the SPCC requirements provided in 40 CFR Part 112. |
| **History and Federal Regulations** |
| In 1970, Congress enacted the Water Quality Improvement Act. The Act stated that the policy of the United States is that there shall be no discharges of oil into the navigable waters of the United States. The discharge of harmful quantities of oil is prohibited. Title 40, Code of Federal Regulations, Part 110 (40 CFR, Part 110) provides the definition of a “harmful quantity” as “…those discharges which will cause a sheen or discoloration of the surface of water or a sludge or emulsion to be deposited beneath the surface of the water.”  The Federal Water Pollution Control Act Amendendments of 1972 were created, and on December 11, 1973, the EPA published regulations which require the establishment of procedures, methods, and equipment to prevent and contain discharges of oil. These regulations became effective on January 10, 1974, and are identified as Title 40, Code of Federal Regulations, Part 112 (40 CFR, Part 112), "Oil Pollution Prevention, Non-Transportation Related Onshore and Offshore Facilities". These regulations have been developed into what is referred to as Spill Prevention, Control and Countermeasure (SPCC) Plan.  In the 1990s, the EPA proposed revisions to the regulations and finalized the amendments in 2002. Since, The EPA has amended the SPCC requirements of the Oil Pollution Prevention regulation to extend compliance dates and clarify and/or tailor specific regulatory requirements. On June 19, 2009, the EPA published in *The Federal Register* a SPCC compliance date extension for all facilities until November 10, 2010. Facilities must amend or prepare SPCC Plans and implement these plans by the same date. |
| **SPCC Plan Location and Availability - 40 CFR 112.3(e)** |
| In accordance with 40 CFR 112.3(e), and because the facility is not monitored twenty-four (24) hours a day, a complete copy of this SPCC Plan is maintained at the offices of the Owner/Operator located at 24372 Crew 194, Grand Field, OK 73546. |
| This SPCC Plan will be available to authorized representatives of local, state, and federal governing agencies for on-site review during normal working hours at the offices of the Owner/Operator. |
| **Sequence of Rule and/or Cross-Reference with SPCC Provisions - 40 CFR 112.7** |
| This SPCC Plan has been written in strict accordance to 40 CFR Part 112. However, its content is not in the exact sequence as the CFR regulations. Please note, in the headings of this SPCC, the applicable and appropriate, section(s) of the SPCC rule being identified were relevant. A Cross-Reference (located on page 8) outlines all CFR regulations by section and sub-section. |

# Professional Engineer Certification

# 40 CFR 112.3(d)

By means of this Professional Engineer Certification, I hereby attest, to the best of my knowledge and belief, to the following:

* I am familiar with the requirements of 40 CFR 112 and have verified that this Plan has been prepared in accordance with the requirements of this Part.
* My agent or I have visited and examined the Facility(s).
* I have verified that this Plan has been prepared in accordance with good engineering practices, including consideration of applicable federal, state and local industry standards.
* I have verified that the required inspection and testing procedures have been established as described in the Plan.
* I have verified that the required inspection and testing procedures
* My certification of this Plan, in no way, relieves the owner/operator of the Facility of their duty to prepare and fully implement the Plan in accordance with the requirements of 40 CFR Part 112. I, in no way, assume any liability of whatsoever kind of nature by my certification.
* This Plan is valid only to the extent that the Facility owner or operator maintains, tests, and inspects equipment, containment, and other devices as prescribed in this Plan [and completes any Implementation Requirements as provided in the Foreword of this Plan].
* The owner/operator, by “Management Approval” located on the following page, acknowledges this certification and the compliance measures described herein.

Registered Professional Engineer

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R.L. Hilbun, P.E. Date

Professional Engineer License No. 14101

Summa Engineering, Inc., OKC, Oklahoma

101 Park Avenue, Suite 490

Oklahoma City, OK 73102-7211

(405) 232-8338

# Management Approval

# 40 CFR 112.7

* For this plan to be effective, A Spill History for this facility must be added by the owner/operator. The “Management Approval” and the “Written Commitment of Manpower, Equipment and Materials” must be signed for this Plan to be complete and in accordance with 40 CFR Part 112. Any and all other federal, state, or local laws which may apply to this Facility must be complied with by the operator.
* By Signature below, the Manager approves this Plan, has the authority to commit the necessary resources to implement this Plan, and acknowledges that the elements identified within this Plan will be implemented.
* This page may be used for the initial Management Approval for subsequent change of management and/or change of designated person accountable.

Signature of designated person accountable for oil spill prevention at the facility:

|  |  |
| --- | --- |
| Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | Title:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  |  |
| Signature :\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

Signature of Manager or Supervisor for this facility:

|  |  |
| --- | --- |
| Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | Title:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  |  |
| Signature :\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

Signature of alternate designated Manager or Supervisor for this facility:

|  |  |
| --- | --- |
| Name:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | Title:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  |  |
| Signature :\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

# Written Commitment of Manpower, Equipment and Materials

# 40 CFR 112.7

* In the event of a discharge, in addition to implementing the preventive measures described in this Plan, Owner/Operator will also specifically:
* I have verified that the required inspection and testing procedures
* I have verified that the required inspection and
* Collaborate fully with local, state and federal authorities on response and cleanup operations.
* Maintain all on-site spill control equipment described in this Plan.
* I have verified that the required inspection and testing procedures have bee
* Ensure that staging areas to be used in the event of a discharge to a water area are accessible by vehicles.
* Review the adequacy of on-site and third-party response capacity with pre-established response/clean-up contractors on an annual basis and update contractor list if necessary.
* Maintain formal agreements/contracts with response and cleanup contractors who will provide assistance in responding to an oil discharge and/or completing cleanup (see contract agreements maintained separately at the Owner/Operator's office and lists of associated equipment and response contractor personnel capabilities).

|  |  |
| --- | --- |
| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |
| Authorized Signature | Date |
|  |  |
| **\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** |  |
| Printed Name |  |

# Five (5) Year Management Review

# 40 CFR 112.5

The function of this log is to document Management’s five (5) year review of the Plan as required under 40 CFR 112.5. All revisions that occur as a result of this review will be documented on the “Revision Record” that follows this page.

**Acknowledgement of 5 Year SPCC Plan Review Completion**

* As required by 40 CFR Part 112.5(b), Management will review this SPCC Plan at least once every five (5) years and document the review on the form below.
* This review includes an evaluation of more effective prevention and control technology that would significantly reduce the likelihood of a spill event from the Facility.
* By signature below, management confirms that a review and evaluation of this SPCC Plan has been completed.
* As a result of this review and evaluation, technical changes in facility design, construction, operation or maintenance that would materially affect the Facility’s potential for discharge into navigable waters of the United States or adjoining shorelines will be recertified by a registered Professional Engineer. Documentation of such revisions will be recorded in the “Revision Record” that follows.
* If no amendment is required, date sign, and indicate the Plan “will not” be amended using the appropriate column.

**Amendments**

|  |  |  |  |
| --- | --- | --- | --- |
| **Review Date** | Signature | Title | Amend Plan (Will/Will Not) |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

**Cross-Reference with SPCC Rule**

# Certification of Substantial Harm Criteria

# 40 CFR 112.20(e), 40 CFR 112.20(f)(i)

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** |  |

1. 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** |  |

1. 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 1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife sensitive environments see Appendices I, II, and III to DOC/NOAA’s “Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments” (See Appendix E to this part, section 13, for availability) and the applicable Area Contingency Plan.

|  |  |  |  |
| --- | --- | --- | --- |
| **Yes** |  | **No** |  |

1. 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 1) such that a discharge from the facility would shut down a public drinking water intake?

|  |  |  |  |
| --- | --- | --- | --- |
| **Yes** |  | **No** |  |

1. 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 discharge 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 | Date |

**Part I – GENERAL FACILITY INFORMATION**

**40 CFR 112.7(a)(3)**

* 1. **Company Information**

|  |  |
| --- | --- |
| **Mailing Address of: $COMPANY$** | **$MAILING\_ADDRESS$** |
| **Physical Address of $COMPANY$** | **$PHYSICAL\_ADDRESS$** |
| **Type of Facility:** | **$FAC\_TYPE$** |
| **GPS Coordinates of Facility:** | **W$LAT$°, N$LON$°** |
| **County & State** | **$COUNTY$, $STATE$** |
| **Date of Initial Operation:** | **$DATEOO$** |

* 1. **Company Contract Information**

The designated person accountable for overall oil spill prevention and response at this facility, also referred to as the facility's ''Response Coordinator'' (RC), is $RC$.

Operations (pumper/gauger) support activities for the facility, including performing periodic and regularly scheduled examinations of the facility equipment, as described in Section 3.4 of this SPCC Plan, are supplied by Owner/Operator. The pumper regularly visits the facility to record production levels, and performs other maintenance and inspection activities as requested by Owner/Operator.

Key 24-hour contact information is provided in Table 1-1 below.

**Table 1-1: Facility Contact Information**

|  |  |  |  |
| --- | --- | --- | --- |
| **Name** | **Title** | **Telephone** | **Address** |
| $PRESIDENT$ | President | $PRES\_PHONE$ | $PRES\_ADDR$ |
| $FOM$ | Field Operations Manager (FOM) | $FOM\_PHONE$ | $FOM\_ADDR$ |
| $RC$ | Response Coordinator | $RC\_PHONE$ | $RC\_ADDR$ |
| $PUMPER$ | Pumper | $PUMPER\_PHONE$ | $PUMPER\_ADDR$ |

# 1.3 Facility Layout Diagram - 40 CFR 112.7(a)(3)

Figure 1 of this Plan, shows a general site plan for the facility. The site plan shows the location of the facility relative to waterways, roads, and inhabited areas. Figure 1 includes a detailed facility diagram that shows the wells, flowlines, tank battery, and transfer areas for the facility. The diagram shows the location of all oil storage containers 55 gallons or greater in capacity. See Table 3-1 for capacity and contents of all Aboveground Storage Tanks (ASTs).

# Facility location and Operations

The Owner/Operator owns and operates the W. F. GEORGE LEASE located at the following GPS coordinates:

Longitude: N$LON$° Latitude W$LAT$°

The main road accessing the facility is $LEASE\_ROAD$. The lease road is constructed of $LEASE\_RD\_CONST$. There are no storm drains within 100 yards of this facility. As illustrated in Appendix Figure 1, the $LEASE$ is composed of $AREA\_NUM$ containment area. This information is also referenced in Tables 3-1 and 3-2. This facility generally isn't monitored 24 hours a day, however, it is checked daily.

Operations personnel from Owner/Operator visit the facility periodically and on a regularly scheduled basis to ensure the proper functioning of all equipment. Any maintenance or repairs are made as soon as possible upon discovery.

The Owner/Operator will coordinate with the local fire and/or police departments and with its residential neighbors, if any, to provide the appropriate warnings in the event of a discharge that could affect public health and safety.

# 1.5 Oil Storage and Handling

|  |
| --- |
| $OB$ |
| $SB$ |

|  |
| --- |
| $OG$ |
| $SG$ |
| $TG$ |

The facility produces an average of: barrels = gallons of crude oil

barrels = gallons of salt water

**Total Gallons**

In the event of system failures or catastrophic weather conditions, the rate of flow per hour would be equal to the storage capacity of each vessel.

There are no buried tanks at this facility that contain oil.

# 1.5.1 Production Equipment – 40 CFR Part 112.9(c)(1)

Production equipment at the facility consists of $PROD\_EQUIP$.

All aboveground storage tanks at this facility that have been shop-built meet the American Petroleum Institute (API) tank construction standards. See Table 3-1 for more details concerning construction of storage tanks and processing equipment. All materials stored in ASTs are compatible with the container's construction materials.

Lubricating oils and other substances, such as solvents and chemicals for downhole treatment, stored at this facility in quantities below the 55-gallon threshold for SPCC applicability are listed below:

Table 1-2: Characteristics of Containers for Lubricating Oils, Chemicals, Solvents, etc.

$CHEMICAL\_TANK\_TABLE$

**Characteristics of Containers**

|  |
| --- |
| LEGEND: OIL=Crude Oil, SW=Salt Water, FW=Fresh Water, PW=Produced Water, BS&W=Basic Sediment & Water, GB=Gun Barrel, HT=Heater Treater, SEP=Separator, CON=Condensate, IH=Inline Heater, DEHD=Dehydrator, W=Welded, M=Molded, B=Bolted, S=Steel, FG=Fiber Glass, WD=Wood, P=Plastic, C=Closed, O=Open, E=Earth, G=Gravel, CMT=Cement, TR=Trucked, INJ=Injection, PL=Pipeline, NIU=Not in use, R=Raised, H=Horizontal,R-H=Raised Horizontal, ST=Steel Tub, PT=Plastic Tub |

# 1.5.2 Transfer Activities – 40 CFR Part 112.9(d)(1)(2)

This SPCC Plan is designed to meet all necessary requirements under 40 CFR Part 112 for a facility designed as an onshore $FAC\_TYPE$ production facility, which stores or produces either crude oil, gas condensate, natural gas, produced water, or any combination of these items daily.

Production from this facility $HT$ treated through a heater treater or separator where any oil, water and gas are separated. $GAS\_PROD\_ANS$

$OIL\_PROD\_ANS$

The oil moves to oil storage tanks by below ground and/or aboveground flowlines. Crude oil from the lease is purchased by Owner/Operator's crude oil purchaser and transported from the facility in Purchaser's tank trucks. Although daily well production rates may vary, enough crude is produced and stored for approximately one (1) load of oil to be picked up as needed by the transporter. Tanker trucks come to the facility only to transfer crude oil and do not remain at the facility. All transfer operations are attended by the trucker or by field operations personnel and shall meet the minimum requirements of the U.S. Department of Transportation Hazardous Materials Regulations. Appendix ''G'' to this Plan summarizes the tank truck loading procedures at this facility.

$SW\_PROD\_ANS$

Any water from the lease is transferred to a water injection well. The location of the well is east 300 feet, where it is returned to a geologically compatible and water receptive formation.

# 1.6 Proximity to Navigable Waters

The nearest water from the $LEASE$ is located $WATER\_DIR. The terrain for this facility is $LAND\_TYPE$ and the adjacent land usage is $ADJ\_LAND\_TYPE. In the event of a discharge at the $LEASE$, the direction of the flow would be south. In the event of an uncontrolled discharge from the wells, flowlines, or the tank battery area, fluids would follow the natural topograpy of the site. All navigable water areas are inspected in the event of a discharge for any accumulation of hazardous chemicals. Any accumulation of a discharge into naviagable waters shall be promptly removed. See Section 2.1 for verbal and written notification requirements.

**1.7** **Alternative Environmental Protection to SPCC Requirements - 40 CFR Part 112.7(a)(2)**

Where this Plan does not conform to the applicable requirements in 40 CFR Part 112.7(g), (h)(2) and (3), and (i) of this section, or the requirements of subparts B and C of this part, except the secondary containment requirements in paragraph (c) and (h)(1) of this section, and §112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), and 112.12(c)(11), Appendix ''P'' states the reasons for nonconformance and describes in detail alternate methods and how to achieve equivalent environmental protection. If the Regional Administrator determines that the measures described in this Alternative SPCC Plan do not provide equivalent environmental protection, the EPA Regional Administrator may require that you amend your Plan, following the procedures in §112.4(d) and (e).

**1.8** **Conformance with Applicable State and Local Requirements - 40 CFR Part 112.7(j)**

This SPCC Plan was written to conform with 40 CFR Part 112 requirements and the requirements from the state of Texas for an onshore oil production facility. All discharge notifications are made in compliance with local, state and federal requirements.

**Part II – OIL SPILL CONTINGENCY & DISCHARGE PROCEDURES**

**40 CFR 112.7(d)(1) & 112.7(d)(iv)**

**2.1** **Discharge Discovery and Reporting - 40 CFR Part 112.7(a)(1,3 & 4)**

Several individuals and organizations must be contacted in the event of an oil discharge. The Field Operations Manager is responsible for ensuring that all required discharge notifications have been made. All discharges should be reported to the Field Operations Manager. The summary table included in Appendix "A" to this SPCC Plan provides a list of agencies to be contacted under different circumstances. Discharges would typically be discovered during the inspections conducted at the facility in accordance with procedures set forth in Section 3.4.1, Tables 3-3 and 3-4, and on the checklist of Appendix "J". The Form included in Appendix "E" of this Plan summarizes the information that must be provided when reporting a discharge to EPA, including contact lists and phone numbers.

**2.1.1** **Verbal Notification Requirements: Local, State, and Federal - 40 CFR Part 110**

|  |
| --- |
| Any unauthorized discharge into the air, land or water must be reported  immediately upon discovery to the  Railroad Commission of Texas  District #: 09 - Wichita Falls  Phone: (940) 723-5088 |

|  |
| --- |
| For any discharge that reaches navigable waters,  or threatens to reach navigable waters, immediate notification must be made to the  NATIONAL RESPONSE CENTER HOTLINE: (800) 424-8802  For any discharge equal to or greater than 1,000 gallons  or a second discharge equal to or greater than 42 gallons within a 12 month period,  notification must be made to the  ENVIRONMENTAL PROTECTION AGENCY (EPA): (214) 665-6444 |

***See Appendix "B" for Additional Contractors and Emergency Contacts.***

In the event of a discharge that threatens to result in an emergency condition, facility field personnel must verbally notify the $REG\_AUTH$ and in no case later than within one (1) hour of the discovery of the discharge. An emergency condition is any condition that could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment or cause severe damage to property. Owner/Operators must provide written confirmation to the $REG\_AUTH$ within twenty (20) days of discovery. Any aboveground release of less than $BRL\_LIMIT$ need not be reported, however, they must be recorded by the Owner/Operator, contained and cleaned up immediately.

**2.1.2** **Written Notification Requirements –State and Federal**

A written notification will be made to EPA for any single discharge of oil to navigable waters or adjoining shoreline waterways of more than 1,000 gallons, or for two discharges of 1 bbl (42 gallons) of oil to a waterway in a 12-month period. This written notification must be made within 60 days of the qualifying discharge, and a copy will be sent to the state agency, which is the state agency in charge of pollution control activities. This reporting requirement is separate and in addition to the reporting discussed above.

**2.1.3** **Submission of SPCC Information - 40 CFR Part 112.4**

Whenever the facility experiences a discharge into navigable waters of more than 1,000 gallons, or two discharges of 42 gallons or more within a 12-month period, Owner/Operator will provide information in writing to the office of the regional office of the Environmental Protection Agency within 60 days of a qualifying discharge as described above. The required information is described on Appendix "E". The Regional Administrator may determine whether an amendment to the SPCC Plan is required.

**2.2** **Spill Response Materials**

Following are recommended materials to be made available to field operations personnel in the event of a discharge.

**Table 2-1: Minimum quantities for spill response**

|  |  |  |  |
| --- | --- | --- | --- |
| **Qty** | **Materials** | **Qty** | **Materials** |
|  | Salvage Drums & Buckets |  | Portable Breathing Apparatus |
|  | Foaming Agents & Fire Suppressants |  | Peat Moss |
|  | Hand Tools |  | Vacuum Trucks, Tanker Trucks, Bob Tail |
|  | Absorbent Materials |  | Portable Containment Booms |
|  | Pumps & Hoses |  | Boots, Waders, Gloves, Coveralls, Masks |
|  | Inflatable Seals |  | Roll Off Boxes, Frac Tanks, Storage Tanks |
|  | Ropes |  | Boats, Skiffs, Barges & Rafts |
|  | Wedges & Plugs |  | Portable Light Sets |
|  | PVS Piping & Fittings - Assorted Sizes |  | Electric Generators |
|  | Sand Bags |  | Plastic Sheeting |
|  | Decontamination Equipment |  | Other: |
|  | Communications Equipment |  | Other: |

|  |
| --- |
| Additional materials are also stored on the pumper's truck in sufficient quantities to contain small discharges (up to approximately 200 gallons). |

The inventory is checked monthly by the Owner/Operator. Supplies can be ordered from Owner/Operator's Vendors.

**2.3** **Spill Mitigation Procedures - 40 CFR Part 112.7(a)(5)**

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, Owner/Operator, the Field Operations Manager, Owner/Operator's personnel, or Contractor's field personnel shall be responsible for the following:

**2.3.1 Shut Off Ignition Sources**

Field personnel must shut off all ignition sources, including motors, electrical circuits, and open flames. See Appendix "F" for more information about shut-off procedures.

All personnel shall know the location and proper use of emergency equipment including fire extinguishers, absorbent booms and pads.

**2.3.2 Stop Oil Flow**

Personnel should determine the source of the discharge, and if safe to do so, immediately shut off the source of the discharge in accordance with OSHA health and safety requirements.

All personnel shall know the location of the emergency shut-off valves if there are any.

**2.3.3 Stop the Spread of Oil and Call the Field Operations Manager**

If safe to do so, field personnel must use resources available at the facility (see spill response materials and equipment listed in Table 2-1) 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 Field Operations Manager, who may obtain assistance from authorized company contractors in order to effectively direct the response and cleanup activities. See Appendix "B" for a list of additional contacts.

**2.3.4 Gather Spill Information**

The Field Operations Manager will ensure that Appendix "E"- EPA Discharge Notification Form is filled out completely and that notifications have been made to the appropriate authorities. The Field Operations Manager may ask assistance in gathering the spill information.

* Reporter's name and telephone number
* Exact location of the spill
* Date and time of spill discovery
* Source of spill
* Material spilled (e.g. oil or produced water containing a reportable quantity of oil)
* Total volume spilled and total volume reaching or threatening navigable waters or adjoining shorelines
* Weather conditions
* Whether an evacuation may be needed
* Spill impacts (injuries, damage, environmental media, (e.g. air, waterways, groundwater)
* Actions being taken to stop, remove, and mitigate the effects of the discharge
* Names of individuals and/or organizations who have also been contacted

**2.3.5 Notify Agencies Verbally**

It is important to immediately contact the Field Operations Manager so that timely notifications can be made. If the Field Operations Manager is not available, or the Field Operations Manager requests it, field personnel must designate one person to begin notification. Section 2.1 of this Plan describes the required notifications to government agencies. The Response Coordinator must also ensure that written notifications, if needed, are submitted to the appropriate agencies.

**2.4 Disposal Plan - 40 CFR Part 112.7(a)(3)(v)**

The Owner/Operator will handle the 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.

Any recovered product not deemed suitable for on-site recycling will be disposed of with the rest of the waste collected during the response efforts.

If the facility responds to a discharge without involvement of a cleanup contractor, Owner/Operator will contract a licensed transportation or disposal company to dispose of waste according to regulatory requirements. The Field Operations Manager will characterize waste and arrange for use of certified waste containers.

**Part III – SPILL PREVENTION, CONTROL, AND**

**COUNTERMEASURE PROVISIONS**

**40 CFR 112.7 AND 112.9**

**3.0 Potential Discharge Volume, Direction of Flow and Containment**

**40 CFR Part 112.7(a)(3)|(i), 112.7(a)(3)|(iii) and 112.7(b)**

The tables below summarizes potential oil discharge scenarios. If unimpeded, oil would follow the site topography and reach the closest body of water ("See Figure 2: Facility Map). In the event of system failures or catastrophic weather conditions, the rate of flow per hour would be equal to the storage capacity of each vessel.

**Table 3-1: Potential discharge volume**

$VESSEL\_TABLE$

|  |
| --- |
| LEGEND: OIL=Crude Oil, SW=Salt Water, FW=Fresh Water, PW=Produced Water, BS&W=Basic Sediment & Water, GB=Gun Barrel, HT=Heater Treater, SEP=Separator, CON=Condensate, IH=Inline Heater, DEHD=Dehydrator, W=Welded, M=Molded, B=Bolted, S=Steel, FG=Fiber Glass, WD=Wood, P=Plastic, C=Closed, O=Open, E=Earth, G=Gravel, CMT=Cement, TR=Trucked, INJ=Injection, PL=Pipeline, NIU=Not in use, R=Raised, H=Horizontal,R-H=Raised Horizontal, ST=Steel Tub, PT=Plastic Tub |

**3.1 Containment and Diversionary Structures - 40 CFR Part 112.7(c) and 112.7(a)(3)(iii)**

The minimum recommended measurements for the secondary containment area are:

$AREA\_STATEMENT$

See Table 3-2 for a description on the catch basins, if any. Load lines shall be equipped with bull plugs and shall be equipped with drip buckets with lids whenever the load lines extend beyond the containment area to help prevent spillage during transfer operations.

**3.1.1 Oil Production Facility Drainage - 40 CFR Part 112.9(b)(1-2)**

There is no facility drainage other than is provided inside of the containment areas. Discharges from ASTs are contained within the secondary containment berm as described in Section 3.2.2. Field drainage systems (ditches), road ditches, and oil traps, sumps/skimmers, if such exist, are inspected in normal field operation inspections. Accumulations of oil are promptly removed under the supervision of the Field Operations Manager using legally approved methods.

**3.1.2 Secondary Containment for Bulk Storage Containers - 40 CFR Part 112.9(c)(2)**

Since this facility has the capacity to store produced liquids in measurable quantities, there shall be secondary containment of sufficient length, breadth and height so as to be capable of holding the maximum content of the largest storage tank within this facility, plus the expected rainfall from a 25-year, 24-hour rainfall event and still allow for at least three (3) inches of freeboard for 24 hours of production. If tank freeboard is insufficient, then auto shutdown systems shall be installed. Said berm or dike shall be constructed so as to be impermeable to crude oil. Sandy soils are NOT acceptable.

Walls of this secondary containment area shall be of earth, steel, concrete, or solid masonry designed to be liquid-tight and to withstand a full hydrostatic head. If any earthen wall is three (3) feet or more in height, it shall have a flat section at the top not less than two (2) feet wide. The slope of an earthen wall shall be consistent with the angle of repose of the material of which the wall is constructed. The walls of this secondary containment area shall be restricted to an average height of six (6) feet above interior grade.

If secondary containment is in the form of a catch basin inside of the berm, this catch basin shall be lined with geo-membrane liner or compacted clay so as to be impermeable. No loose combustible material, empty or full drums or barrels shall be permitted within the secondary containment area. They should be kept at least 75 feet away.

**3.1.2 Good Engineering Practices – 112.9(c)(4)(i-iv)**

This facility's installations have been engineered in accordance with good engineering practices. In order to prevent discharges, the Owner/Operator shall utilize any of the following options:

1. Container capacity adequate to assure no overfills if pumper/gauger is delayed in making regularly scheduled rounds;
2. Overflow equalization lines between containers so that a full container can overflow to adjacent container;
3. Vacuum protection adequate to prevent container collapse during a pipeline run or other transfer of oil from the container; and/or
4. High-level sensors to generate and transmit an alarm signal to the computer where the facility is subject to a computer production control system.

There is also a chance of a discharge when fluids are being transferred from the storage tanks to outside of the secondary containment wall. When custody is being transferred by flowlines, there are periodic inspections to detect discharges as defined in the flowline maintenance program on Table 3-8. When custody is being transferred by truck, there are people present to monitor the transfer. Thus, the likelihood of a spill is diminished. Should one occur, its size should be small and someone will be present to immediately shut down the facility. Truck transfer may occur outside the secondary containment area and could occasionally suffer a minor leak as hoses are disconnected. If the collection point falls outside the walls of this facility, a catch basin and a drip bucket with a lid shall be used underneath the connection to catch any leaks or drips and it shall be emptied back into the oil storage tanks or the contents disposed of properly.

The floor of the berm shall be constructed of compacted earth with a layer of clay that ensures that the berm is able to contain the potential release of oil from the storage tanks until the discharge can be detected and addressed by field operations personnel. Facility personnel inspect the berm periodically and on a regularly scheduled basis for the presence of spillage and erosion. Excessive vegetation is not permitted inside the berm walls.

Normal rainwater is allowed to evaporate and/or is drained under the supervision of the Field Operations Manager or his agent, who will complete the required information on Appendix "I" and submit the written report to the Owner/Operator.

Free oil or fuel products are promptly removed and disposed of in accordance with legally approved methods. Drainage events are recorded on the form provided in Appendix "I", including the time, date, and name of the employee who performed the drainage. The records are maintained with this SPCC Plan at Owner/Operator's office for a period of three (3) years.

The containment Area isn't equipped with an emergency automatic shut-off system; isn't equipped with a dike drain, and isn't equipped with a sump pump.

If there is a dike drain, the valve for the dike drain is maintained in the closed position when the drain is not in use.

**Table 3-2 Berm capacity calculations - 40 CFR Part 112.7(c) & 112.7(a)(3)(iii)**

$BERM\_TABLE$

|  |
| --- |
| **Secondary Containment Calculations** |
| **Total Secondary Containment Area Capacity (Vt)** |
| |  | | --- | | Total Area Available (Anet) = (A) - Area Occupied by Vessels (Av) | | (Anet) = 2160 sq.ft. - 78 sq.ft. | | **(Anet) = 2082 sq.ft.** | | (Vt) = Largest Tank (bbls) + Total 24 Hr. Prod (bbls) - Volume of Catch Basin (Vcb) cu.ft. / 5.615 cu.ft./bbl | | (Vt) = 152 bbls + 0 bbls - cu.ft. / 5.615 cu.ft./bbl | | **(Vt) = 152 bbls** | |
| **Berm Height Analysis** |
| Minimum Recommended Berm Height = (Vt) cu.ft. x 12 in./ft. / (Anet) sq.ft. + (rainfall: 25 year / 24 hour event)\* + 3 in. freeboard  Minimum Recommended Berm Height = 152 bbls x 5.615 cu.ft./bbl x 12 in./ft. / 2082 sq.ft. + 7 in. + 3 in. freeboard  Minimum Recommended Berm Height = 15 in.  Lowest point of berm at time of inspection = 0 in. |
| \* The 25 year / 24 hour event is derived from Technical Paper No. 40 of the Rainfall Frequency Atlas of the United States as published on the National Weather Service (NWS) website: http://www.nws.noaa.gov/oh/hdsc/PF\_documents/TechnicalPaper\_No40.pdf |

Engineers Notes: $ENGINEER\_NOTES$

**Few facilities are built on perfectly flat surfaces. Therefore, considerations and adjustments for drops in elevations of the terrain must be made when constructing the dikes.**

$FACILITY\_DRAWING$ - should they just insert these images?

Not Drawn to Scale

|  |
| --- |
| ***The tanks in this diagram are numbered. The corresponding volume and contents of each numbered tank are located on Table 3-1.*** |
| ***The berm calculations of the diked areas are located on Table 3-2.*** |

$MAP$ - should they just insert these images?

GATE LOCK INFORMATION: $GATE\_LOCK$

GATE ENTRANCE GPS COORDINATES: W$LAT$° N$LON$°

SPECIAL DRIVING DIRECTIONS:

See Above

**3.1.5 Practicability of Secondary Containment - 40 CFR Part 112.7(d)**

Flowlines adjacent to the production equipment and storage tanks are located within the berm, and therefore have secondary containment. Aboveground flowlines that go from the wells to the production equipment and buried flowlines, however, lack adequate secondary containment and it is not practical to construct secondary containment for flowlines, gathering or injection lines for the wells associated with this facility.

**3.2 Other Spill Prevention Measures**

**3.2.1 Bulk Storage Containers Overflow Prevention - 40 CFR Part 112.9(c)(4)**

The tank battery is designed with a fail-safe system to prevent discharges, as follows:

The capacity of the storage tank(s) is sufficient to ensure that storage is adequate in the event that facility personnel are unable or delayed in stopping production. Otherwise, automatic shut-offs shall be installed to prevent overflow.

**3.2.2 Transfer Operations and Water Disposal Systems - 40 CFR Part 112.9(d)(1-2)**

Flowlines and their associated equipment are compatible with the produced fluids, their corrosivity, volume, pressure and existing conditions. All aboveground valves and piping and other equipment associated with transfer operations are inspected periodically and on a regularly scheduled basis as described in Section 3.4 of this Plan and particularly following weather related changes that may increase the chance of a discharge. Brine and/or produced water disposal facilities are inspected on a regularly scheduled basis, particularly following a sudden change in atmospheric temperature in order to detect possible system upsets capable of causing a discharge. Needed repairs indicated by inspection will be promptly performed. Any discharge revealed by inspection will be promptly remediated. This oil spill contingency plan, including the Written Commitment of Manpower Equipment and Materials, applies for flowlines that have no secondary containment.

**3.3 Inspections, Tests, and Records - 40 CFR Part 112.7(e)**

This Plan outlines procedures for inspecting the facility equipment in accordance with SPCC requirements. Records of inspections performed as described in this Plan and signed by the appropriate supervisor are a part of this Plan. Records will be kept with this Plan at the office of Owner/Operator for a minimum of three (3) years. The reports include a description of the inspection procedures, the date of the inspection, whether drainage of accumulated rainwater was required, and the inspector’s signature.

The program established in this SPCC Plan for regular inspection of all storage tanks and related production and transfer equipment follows the American Petroleum Institute’s Recommended Practice for Setting Maintenance, Inspection, Operation, and Repair of Tanks in Production Service (API RP 12R1, Fifth Edition, August 1997). Each container is inspected annually by field operation personnel as described in this Plan and following the checklist provided in Appendix "J" of this SPCC Plan, or by an outside third party. The annual inspection is aimed at identifying signs of deterioration and maintenance needs, including the foundation and support of each container. Any leak from tank seams, gaskets, rivets, and bolts is promptly corrected.

The Owner/Operator does not employ a full time Response Coordinator.

The President has $YEARS\_XP$ years experience in the industry and has sufficient knowledge in spill prevention, clean-up and remediation.

The Owner/Operator performs all routine maintenance at its own initiative and has located and corrected several potential future problems by operating in this fashion. The documentation of spills and clean-up activities is the responsibility of the Response Coordinator

**3.3.1 Daily and monthly Scheduled Examinations**

The facility is visited daily and on a regularly scheduled basis by the Owner/Operator who conducts visual examinations during a walk through of the tank battery and around the wells. The wells and production equipment are checked for leaks and to ensure that the wells are operating properly. All aboveground valves, polished rod stuffing boxes, wellheads, fittings, gauges and flow line piping at wellhead are examined. Pumps are inspected to verify proper function and checked for any possible damage and leakage. The tank battery is visually inspected for water accumulation within the tank battery berms and the condition and position of valves are verified. Storage tanks are gauged and a production report is maintained. All malfunctions, improper operation of equipment, evidence of leakage, stained or discolored containment areas, etc. are logged and communicated to the Field Operations Manager (FOM).

**Table 3-3 Scope of daily visual examinations**

|  |  |  |
| --- | --- | --- |
| **Facility Area** | **Item** | **Observations** |
| **Storage Tanks (Oil, Brine and Produced Water)** | **Leaks** | Tank liquid level gauged |
| Drip marks, leaks from weld seams, base of tank |
| Puddles containing spilled or leak material |
| Corrosion, especially at base (pitting, flaking) |
| Cracks in metal |
| **Foundation** | Cracks |
| Puddles containing spilled or leaked material |
| Settling |
| Gaps at base |
| Flowlines | Evidence of leaks, especially at connections/collars |
| Corrosion(pitting, flaking) |
| Settling |
| Evidence of stored material seepage from valves or seals |
| Bull plugs & drip bucket, when applicable |
| **Wells** | **Leaks** | Evidence of oil seepage from pumping rod stuffing boxes, wellhead and wellhead flowlines, valves and gauges |
| **Brine and Produced Water Pumps** | **Leaks** | Leaks at seals, flowlines, valves, hoses |
| Puddles containing spilled or leaked material |
| Corrosion |
| **Containment** | **Conditions** | Excessive soil or vegetation buildup against base |
| Breach or deterioration in containment wall |

**3.3.2 Annual Inspections**

Appendix "J" summarizes the scope of the annual inspection. The annual inspection covers the wellheads, visible aboveground flowlines, and all processing equipment. It also includes verifying the proper functioning of all detection devices, including high-level sensors on oil storage tanks, heater treaters, and separators, if applicable. Storage 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 annual inspection also involves visually inspecting all aboveground valves and pipelines and noting the general condition of items such as transfer hoses, flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, bleeder and gauge valves, locking of valves, and metal surfaces.

**Table 3-4: Scope of annual inspections**

|  |  |  |
| --- | --- | --- |
| **Facility Area** | **Equipment** | **Inspection Item** |
| Tank Battery | Storage Tanks | Leakage, gaskets, back cover plates |
| Tank welds in good condition |
| Vacuum vents |
| Overflowlines |
| Piping, valves, and bull plugs |
| Corrosion, paint condition |
| Pressure relief valves |
| Truck Loading | Loadlines, Drip Pans, Valves, Catchment Berm | Valve closed and in good condition |
| Cap or bull plug at end of load line/connection |
| Sign of oil or standing water in drip pan(s) |
| Sign of oil or standing water in catchment berm |
| Sign of oil in surrounding area |
| Wells | Flowing Wells, Pump-Jacks, Disposal Wells | Spills and leaks (e.g., stuffing box) |
| Equipment protectors and signs |
| General housekeeping |
| Leasehold Area Between Wells and Tank Battery | Visible Flowlines Within 100 Yards of Containment Area | Flowline between the well and tank battery/separation equipment |
| Exposed line of buried piping |
| Valves (condition of, whether locked or sealed) |
| Evidence of leaks and/or damage, especially at connections/collars. |
| Corrosion (pitting, flaking) |
| Pipe Supports |
| Roads and Ditches | Evidence/puddles of crude oil and/or produced water |
| Containment Area | | Berm and curbing |
| Presence of contaminated or stained soil |
| Excessive vegetation |
| Equipment protectors and signs |
| Engine drip pans and sumps |
| General housekeeping |
| Other | Chemicals, Fuels and Lube Oils | Storage conditions |
| Response Staging Areas | Area | Road practicable by field vehicle |
| Area clear of excessive vegitation |

If the annual inspection is conducted by the Owner/Operator's personnel, the checklist provided in Appendix "J" is used for annual inspections; otherwise, the annual inspection report is furnished by a third party inspector. These inspections are performed in accordance with written procedures developed by engineering specifications and maintenance schedule developed by the equipment manufacturers.

All safety devices are tested annually by a third party inspector. The tests are recorded and the results are maintained with this Plan at the offices of Owner/Operator. Testing of the safety devices is conducted in accordance with guidelines API RP-14C published by the American Petroleum Institute, or in accordance with instructions from the device’s manufacturer. Written test procedures are kept at the offices of the third party testing company and are available upon request.

Additionally, the Field Operations Manager (FOM), (or his designated representative) annually drives to the pre-established response staging areas located at different points along any water (creeks, ponds, rivers, etc.) that might be affected to ensure that the dirt/gravel roads are accessible using field vehicles and that this SPCC Plan can be implemented in the event of a discharge from flowlines reaching these areas.

**3.3.3 Periodic Condition Inspection of Bulk Storage Containers**

A condition inspection of bulk storage containers is performed by a "competent inspectors". Competent inspectors for tank condition examinations should have education and experience equal to the following:

* Training as a bulk storage container inspector;

OR

* A high school graduate or equivalent,

AND

* A minimum of 5 years of oil field production experience.

The inspection consists of two parts: (1) a visual inspection for signs of deterioration or discharges, and (2) this same visual inspection at a time when the tank is substantially full of fluid to constitute a hydrostatic test.

Condition inspections are also done internally or externally. Usually, the condition inspections should need to be done only after the competent inspector conducts an examination, and it is determined that a more detailed assessment of the tank's integrity is required.

A summary of the types of observations and the frequency of inspections are shown in Tables 3-5 and 3-6. Table 3-5 shows the schedule for internal tank examination and inspection and Table 3-6 shows the schedule for external tank examination and inspection.

**Table 3-5: Internal tank examination/inspection schedule**

|  |  |
| --- | --- |
| **Scheduled Type** | **Frequency** |
| Condition Examination | When a tank is   1. Cleaned for normal operations. 2. Transferred to a new location. 3. Serviced or changes for more than 5 years after an inspection. 4. Entered for any type of maintenance or modification. |
| **Unscheduled Type** | **Frequency** |
| Condition Examination | When results from an external condition examination warrant it. |
| Condition Inspection | When warranted by results of condition examination. |

**Table 3-6: External tank examination/inspection schedule**

|  |  |
| --- | --- |
| **Scheduled Type** | **Frequency** |
| Routine Operational Examination | At least once a month. |
| Condition Examination | Once a year. |
| Condition Inspection | As determined from corrosion rate but not more than 15 years after construction. |
| **Scheduled Type** | **Frequency** |
| Condition Examination | When operational alert, malfunction, shell or deck leak, or potential bottom leak is reported as a result of an operational examination. |
| Condition Inspection | When warranted by results of condition examination. |

The periodic schedule dates for the bulk storage containers condition inspection described in Tables 3-5 and 3-6 above are listed below in Table 3-7. This table shall be updated by the Owner/Operator whenever a condition tank inspection is required.

**Table 3-7: External tank examination/inspection schedule**

$TANK\_INSPECTION\_TABLE$

**3.3.4 Brittle Fracture Evaluation - 40 CFR Part 112.7(i)**

At the present time there are no field constructed welded bulk storage containers. Such containers and any container that is field altered or subject to conditions that may cause a brittle fracture failure must be properly evaluated.

**3.3.5 Flowline Maintenance Program - 40 CFR Part 112.9(d)(3)**

The facility’s gathering and flowlines are constructed of steel & polyurethane, and will be visually inspected on a daily basis. However, additional inspections will be conducted after any significant weather or seismic event that poses a threat to the integrity of the lines.

Inspections will be visual and include: a) observation of surface areas for signs of leakage from buried lines; b) observation of aboveground lines for signs of leakage, corrosion, pitting, and flaking; c) inspection of any flowline supporting structures for signs of excess abrasive wear; d) wellheads, valves, and joints will be inspected for signs of fracture and possible function failure. The terminal connection at the transfer point of piping that is not in service or that is in standby service for an extedded time shall be capped or blank-flanged and marked as to its origin.

All flowlines and flow line components replaced or installed after August 16, 2002, will either be wrapped or have cathodic protection.

Supporting structures for above surface flowlines will be designed to allow for expansion and contraction and to minimize abrasion. The entire flowline system and its components will be maintained to minimize the potential for discharge as summarized in Table 3-8. Components will be replaced as needed when a repair is not adequate to prevent the likelihood of a discharge.

Records of inspection, leaks, tests, and part replacements are kept at the Owner/Operator’s office for at least three (3) years. Mechanical Integrity Test results will be kept for ten (10) years.

In the event of a discharge from the flowline system the Owner/Operator will follow the steps outlined in Part II - Oil Spill Contingency & Discharge Procedures of this SPCC Plan, which is made a part of this Flowline Maintenance Program.

Vehicles entering the facility shall be warned as necessary to be carful of endangering any aboveground piping or other oil transfer operations that may be present.

**Table 3-8: Components of flowline maintenance program**

|  |  |
| --- | --- |
| **Component** | **Measures/Activities** |
| Inspection | Personnel visually inspect flowlines as part of periodic and regularly scheduled inspections and particularly following weather related changes that may increase the chance of discharge. |
| Observation of surface areas for signs of leakage from buried lines. |
| Observation of aboveground lines for leakage, corrosion, pitting, and flaking. |
| Inspection of any flowline supporting structures for signs of excessive abraisive wear. |
| Wellheads, valves, and joints will be inspected for signs of fracture and possible function failure. |
| Buried portions of flowlines are visually inspected for damage or deterioration when they are repaired, replaced or otherwise exposed. |
| Repairs | Should inspection indicate needed repairs, those repairs will be performed promptly. |
| Discharges | Should an inspection reveal any discharge, that discharge will be promptly remediated. |

**3.4 Personnel, Training, and Discharge Prevention Procedures - 40 CFR Part 112.7(f)**

The Response Coordinator has been designated as the point of contact for all oil discharge prevention and response training at this facility. The training for all Owner/Operator's employees engaged in the operation and maintenance of oil/fuel storage containers, the operation of equipment related to storage containers, and emergency response is required to include, at a minimum: the operation and maintenance of equipment to prevent the discharge of oil; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations, and the contents of this SPCC Plan. Appendix "K" shall be completed and signed by each employee receiving training. Appendix "L" shall be used whenever group meetings are scheduled. All employees attending this meeting shall sign this Appendix "L" prior to the beginning of the discussions.

The EPA and OSHA require 40-hour and 24-hour training for hazardous waste site cleanup activities. The 40-hour training is for workers engaged in hazardous substance removal or other activities which expose or potentially expose workers to health hazards. The 24-hour training is for workers who are unlikely to be exposed to concentrations above permissible exposure limits and/or published exposure limits. Both categories of employees are required to have 8 hours of refresher training a year. **The employer must decide, based upon work activity, how many hours of training are required.**

Employees who are expected to respond in the event of an emergency resulting from the release of a hazardous substance must meet the requirements outlined in OSHA Standard 1910.120(q). This paragraph describes five levels of training requirements for five distinct levels of emergency response activity and responsibility.

Employees involved in post-emergency response work, i.e. cleaning up a spill which no longer requires an emergency response, are discussed in OSHA Standard 1910.120 (q)(11), which refers back to paragraphs (b) through (o). If the cleanup is done on the facility using Owner/Operator's employees, then the required training must include 29 CFR 1910.38(a) - Emergency Action Plan; 1910.134 - Respiratory Protection; 1910.1200 - *Hazard Communication Standard* and other safety and health training as required by the tasks to be performed. Attachment "C", the OSHA Instruction CPL 2-2.51, provides further information on training requirements for employees involved in post- emergency response operations.

**In the event of a spill, clean-up must be performed by trained personnel. Any non-certified HAZMAT or HAZWOPER employee must evacuate immediately and then follow notification procedures outlined in this SPCC Plan.**

Owner/Operator ensures that all contracted personnel are familiar with the facility operations, safety procedures, and spill prevention and control procedures described in this Plan prior to working at the facility. All contractors working at the facility receive a copy of this SPCC Plan.

Owner/Operator's management holds briefings with field operations personnel (including contractor personnel as appropriate) at least once a year, as described in *3.5.2 Spill Prevention Briefing* of this SPCC Plan.

**3.4.1 Spill Prevention Briefing**

The Field Operations Manager consults with the Authorized Representative annually to ensure adequate understanding and effective implementation of this SPCC Plan. These briefings highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. The briefings are conducted in conjunction with the company safety meetings. Briefings may be conducted via telephone with faxed acknowledgement of said telemeeting, which includes the topics of discussion. These records are maintained with this Plan at the offices of Owner/Operator and Field Operations Manager. A Discharge Prevention Briefing Log is provided in Appendix "I" to this Plan and is used to document the briefings. The scheduled annual briefing includes a review of Owner/Operator's 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 procedures; spill reporting procedures; spill response; and recovery, disposal, and treatment of spilled material.

Personnel are instructed in operation and maintenance of equipment to prevent the discharge of oil and in applicable federal, state, and local pollution laws, rules, and regulations. Facility operators and other personnel have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

**3.4.2 Security - 40 CFR 112.7(g)**

**This section does not apply to production facilities.**

**3.4.3 Contractor Instructions**

In order that there will be no misunderstanding on joint and respective duties and responsibilities to perform work in a safe manner, Contractor's personnel will also receive instructions on the procedures outlined in this SPCC Plan. The instructions cover the contractor activities such as servicing a well or equipment associated with the facility.

All contractual agreements between Owner/Operator and Contractors shall specifically state:

*Personnel must, at all times, act in a manner to preserve life and property, and prevent pollution of the environment by proper use of the facility’s prevention and containment systems to prevent hydrocarbon and hazardous material spills. No pollutant, regardless of the volume, is to be disposed of onto the ground or water, or allowed to drain into the ground or water.*

*Federal regulations impose substantial fines and/or imprisonment for willful pollution of navigable waters. Failure to report accidental pollution at this facility, or elsewhere, can be cause for equally severe penalties to be imposed by federal regulations.*

*To this end, all personnel must comply with every requirement of this SPCC Plan, as well as taking necessary actions to preserve life, and property, and to prevent pollution of the environment.*

*It is the contractor’s (or subcontractor’s) responsibility to maintain his/her equipment in good working order and in compliance with this SPCC Plan. The contractor (or subcontractor) is also responsible for the familiarity and compliance of his/her personnel with this SPCC Plan.*

*Contractor and subcontractor personnel must secure permission from Owner/Operator's Operations Manager before commencing any work on any facility. They must immediately advise the Field Operations Manager (FOM) of any hazardous or abnormal condition so that the Field Operations Manager (FOM) can take corrective measures.*

*Any "discharges" that occur due to or witnessed by the contractor, its agents, employees, subcontractors, persons for whom the contractor has responsibility, or other person the contractor is aware of, shall immediately take the measures necessary to prohibit, stop, abate or contain any such "spills" or "discharges."*

The Contractor shall install and maintain adequate "spill" and "discharge" control equipment as is necessary to prevent "spills" and "discharges" that are or could be, in violation of any and all federal, state and local laws, regulations, rules, standards, orders and official guidelines. All of contractor's employees, agents, subcontractors, and persons for whom Contractor is responsible shall be trained and/or briefed as necessary in the use of this control equipment.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ ­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*Contractor's Representative Date*

Where no contract exists, a copy of these instructions shall be supplied to all contractors via the

U.S. Mail with proof of delivery.

See Appendix "B" - Additional Contractors & Emergency Contacts.

**APPENDIX A: Discharge Notification Procedures**

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

Circumstances, instructions, and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local agencies, and to other affected parties, are provided below. **The Federal and State Agencies' emergency contact information shall be posted at the office.**

Note: Any discharge to water must be reported immediately to the National Response Center.

|  |
| --- |
| $RC$ |
| $RC\_PHONE$ |

Response Coordinator:

RC Phone Number:

Local Emergency (Fire, Explosion, or Other Hazard): **911**

|  |  |  |  |
| --- | --- | --- | --- |
|  | | **Circumstances** | **When to Notify** |
| **Federal Agencies** | | | |
| EPA National  Response Center | (800) 424 - 8802 | Discharge reaching navigable waters | Immediately (verbal) |
| EPA REGION: | $EPA\_REGION$ | Discharge 1,000 gallons or more;  or secondary discharge of 42 gallons or more over a 12-month period. | Immediately (verbal) and written notification within 60 days  (See Section 2.1 of this Plan) |
| Phone: | $EPA\_PHONE$ |
| Address: | $EPA\_ADDR$ |
| **State Agencies** | | | |
| $STATE\_AGENCY$  $DISTRICT$ | | 1. Impact to areas beyond the facilities confines 2. 5 or more barrels spilled 3. Any discharge that reaches any creeks, ponds, rivers, etc. | Immediately (verbal) and written within 20 days |
| Phone: | $STATE\_PHONE$ |
| Address: | $STATE\_ADDR$ |
| **Local Agencies** | | | |
| $FIRE\_DEPT$ | | 1. Injury requiring hospitalization or fatality 2. Fire, explosion, or other impact that could affect public safety | Immediately (verbal)  Immediately (verbal) |
| $FIRE\_ADDR\_1$  $FIRE\_ADDR\_2$  $FIRE\_PHONE$ | |
| Local Emergency  Planning Committee | $PLANNING\_ADDR$ |  |  |
| Phone | $PLANNING\_PHONE$ |
| **Response/Clean-up**  **Contractors** | **See Appendix “B”** | | As Needed |

**APPENDIX B - Additional Contractors & Emergency Contacts**

|  |  |  |
| --- | --- | --- |
| **Emergency Response Contractors** | **Company** | **Phone** |
| **Environmental Services and Supplies** | Scientific Environmental | (405) 330-2856 |
| **Backhoe/Dozer/Heavy Equipment** | $BHDHE\_COMPANY$ | $BDHE\_PHONE$ |
| **Vacuum Truck/Tankers/ Frac Tanks** | $VTTFT\_COMPANY$ | $VTTFT\_PHONE$ |
| **Roustabout Crews** | $RC\_CREW$ | $RC\_CREW\_PHONE$ |

|  |  |  |
| --- | --- | --- |
| **Additional Emergency Agencies/Contacts** | **Company** | **Phone** |
| **Police Department** |  | 911 |
| **Local Ambulance** |  | 911 |
| **Local Hospital** |  | 911 |
| **Sherriff’s Department** | $SHERIFF$ | |
| $SHERIFF\_PHONE$ | |
| **Department on Environmental Quality** | $DEPT\_EQ$ | |
| $DEPT\_EQ\_PHONE$ | |
| **Department Wildlife Conservation** | $DWC$ | |
| $DWC\_PHONE$ | |
| **State Fire Marshal** | $FIRE\_MARSHAL$ | |
| $FIRE\_MARSHAL\_PHONE$ | |
| **State Highway Patrol** | $HYPO$ | |
| $HYPO\_PHONE$ | |
| **U.S. Army Corp of Engineers** | $ARMY$ | |
| $ARMY\_PHONE$ | |
| **Water Resource Board** | $WRB$ | |
| $WRB\_PHONE$ | |