

1. PURPOSE

This Standard is intended to ensure compliance with federal laws and associated regulations. Some state and/or local governments may have their own laws and regulations protecting endangered species, critical habitat, and/or surface waters and wetlands. Expand may have other legal obligations imposing additional requirements in some jurisdictions, which will be addressed in the associated Procedure(s). This Standard also establishes the minimum requirements for developing Procedure(s) to assess potential Environmental Receptors prior to Construction.

2. SCOPE

This Standard applies to all Construction activities that require earth disturbance, including but not limited to the installation and maintenance of roads, pipelines, pad sites, midstream sites and facilities, office buildings, material and product transfer facilities, trucking yards, well service yards, drilling yards, quarries, etc. Contractors **shall** be aware of and follow applicable permits and regulatory requirements.

3. DEFINITIONS

Aquatic Resources – All surface waters including Waters of the U.S., Waters of the State (where defined by state laws and regulations), wetlands, streams, lakes, rivers (including wild and scenic rivers), ponds, and designated Critical Resource Waters. This does not include groundwater.

Assessment Report – The written report generated by a Qualified Individual containing any Environmental Receptor(s) within the Environmental Study Area pursuant to an Initial Review and Field Review.

Construction – Any disturbance of earth initiated by, at the direction or on behalf of Expand, including, but not limited to:

- Grading and Excavation (e.g., heavy earth movement, digging holes for fence posts, blasting, etc.).
- Clearing that results in ground disturbance and/or grubbing.
 - Does not include felling of trees where no disturbance of earth is anticipated.
- Installation of new infrastructure or alteration of previously permitted infrastructure
- Maintenance, improvements and expansions of existing roads, pad sites, rights-of-way, etc.

- Activities that result in an obstruction or encroachment to a waterway. (e.g. placement or movement of dredged or fill material within a stream or floodway including, soil, gravel, rock, debris, etc.).
- Site closure activities.

Cultural Resource – These include collective evidence of the past activities and accomplishments of people. Buildings, objects, features, locations, and structures with scientific, historic, and cultural value are all examples of cultural resources.

Emergency Repairs – Repairs made in response to an unplanned incident that has the potential to impact public safety, health, the environment, and/or Expand’s reputation.

Environmental Receptor – Environmental receptors are both natural and man-made features that have special societal value, requiring extra attention when planning construction activities. Receptors may include, but are not limited to the following:

- Aquatic Resources
- Cultural and Natural Resources (State and Federal)
- Wellhead Protection Areas/Public Water Supplies

Environmental Study Area – An area consisting of the Limits of Disturbance plus a minimum buffer distance to be determined based on the scope of the project, not extending past physical impediments and/or legal boundaries.

Field Review – A field visit to the Environmental Study Area conducted by a Qualified Individual to determine the presence or lack thereof and/or potential impact to an Environmental Receptor. This process includes identifying all Environmental Receptors within the Environmental Study Area.

Initial Review – The preliminary desktop evaluation of the preferred/identified location(s) for the presence of and/or potential impact to Environmental Receptors.

Limits of Disturbance (LOD) – The outermost boundary disturbed by Construction activities. This includes the area disturbed by Construction, material storage, landscaping, erosion and sediment controls, and any additional area required for access and maintenance as indicated by the design plan.

Natural Resources – Biological or ecological features. These include but are not limited to indigenous aquatic life, critical habitat, spawning areas, and migratory bird breeding areas.

Qualified Individual (QI) – An individual with the qualifications outlined in the Roles and Responsibilities section, the training to identify potential Environmental Receptors and to perform environmental studies required by this Standard.

Shall – Denotes a minimum requirement to conform to the Standard. To aid the reader, “shall” requirements are identified in bold. Any deviation from a minimum requirement must be approved via the Standard Exception Form.

Should – Denotes a recommendation, or that which is advised, but not required to conform to the Standard.

4. ROLES & RESPONSIBILITY

HEALTH, SAFETY, ENVIRONMENTAL & REGULATORY (HSER)

- Verify QI credentials before work begins.
- Track all permits related to this Standard.
- Provide advice and assistance during the development of any necessary Standards and/or Procedure(s) to ensure compliance with all applicable laws and regulations.
- Oversee initial review in accordance with the Standard and/or Procedure(s).
- Serve as the technical point of contact, when necessary, for the Entities with any agencies involved with natural or cultural resource issues, including the U.S Environmental Protection Agency (EPA), USACE, U.S. Fish and Wildlife Service and similar state agencies.
- Audit in accordance with Section 7 of this Standard.
- Develop and maintain training in accordance with this Standard, when necessary.

MANAGEMENT

- Assign responsibility for implementation and compliance with the Standard requirements and development of any necessary Procedure(s).
- Identify Employees who require training on the Standard and Procedure(s).
- Ensure adequate internal and external resources are provided in order to comply with the Standard requirements Procedure(s).

EMPLOYEES

- Provide comments/suggestions during the Standard or Procedure(s) review process and/or whenever potential deficiencies are identified.
- Comply with the Standard requirements and Procedure(s).

QUALIFIED INDIVIDUAL (QI)

- Conduct Initial and Field Reviews in accordance with recognized industry standards that meet regulatory agency requirements, utilizing, where appropriate, best professional judgment.

- Develop an Assessment Report and provide follow-up communication and documentation.
- Prepare and submit permit applications to applicable agencies, when necessary, under direction of the HSER technical point of contact.
- Qualifications for QIs:
 - **Shall** have the proper license and/or qualifications and experience to perform the work they are commissioned to do.
 - **Shall** have knowledge of applicable federal, state, and local environmental laws, regulations, and other requirements in the area that they are performing work as they pertain to Construction activities.
 - If a contractor, **shall** be an approved vendor with Expand.

5. REQUIREMENTS

Procedure(s) **shall** be developed or revised to meet the requirements of this Standard, as necessary.

5.1 SITE ASSESSMENT PROCEDURE(S) DEVELOPMENT

Procedure(s) **shall** be developed and approved by HSER in conjunction with Operations and other appropriate stakeholders to ensure, at a minimum, that all elements of the Standard are included. Procedure(s) **shall** include additional components to meet its own needs including, but not limited to any applicable federal, state, local and/or legal requirements that may necessitate a review of an area larger than the Environmental Study Area established in this Standard.

Procedure(s) **shall** require documentation of all reviews and/or assessments and the archival of the review or assessment in electronic format in an appropriate network location as specified in Section 5.3 of this Standard document. Documentation **shall** include identification of the persons or persons performing the review and/or responsible for approval of the review or assessment.

5.2 MINIMUM REQUIREMENTS OF SITE ASSESSMENT PROCEDURE(S)

Assessments **shall** be completed prior to commencing the Construction project. At a minimum, Procedure(s) **shall** include the following:

1. Initial Review Section
 - a) Establish an Environmental Study Area for every Construction project.
 - b) Perform a desktop review assessing the Environmental Study Area and identifying potential impacts to the Environmental Receptors.

- i. Ensure Construction activities avoid or minimize, to the maximum extent practicable, impacts to Environmental Receptors within the LOD.
 - c) Review federal, state, local and project specific regulatory requirements.
- 2. Field Review Section
 - a) A field review **shall** be conducted by a QI to field-verify any potential impacts. Exceptions **shall** be consistent with regional requirements.
 - b) QI **shall** provide adequate Environmental Receptor identification.
 - c) QI **shall** provide an assessment report detailing the findings.
- 3. Permitting Section
 - a) Appropriate permits, clearances and/or approvals **shall** be obtained based on project reviews, as required by federal, state, local and project specific regulatory requirements as outlined in the Procedure(s).
 - b) All existing permits or emergency permits **shall** be followed.
- 4. Emergency Repairs Section
 - a) Emergency repairs **shall** follow a notification process to appropriate parties as outline in the Procedure(s).

5.3 DOCUMENT STORAGE AND RETENTION

All documents created as a result of the Standard or its associated Procedure(s) **shall** be stored in an appropriate location as specified in the individual Procedure(s). Documents **shall** be retained in accordance with the Records Retention Schedule, Controlled Documents Standard and/or other applicable laws or legal condition.

6. TRAINING

Training on this Standard and Procedure(s) **shall** be provided initially to all Employees whose responsibilities include Construction activities. Updates to this Standard will be incorporated into the training curriculum and additional training will be provided as warranted.

7. AUDIT REQUIREMENTS

Audits **shall** be periodically conducted by HSER in order to confirm compliance with this Standard.

8. STANDARD EXCEPTIONS

Any exceptions pertaining to Operational/HSER Standards **shall** be documented and approved using the Operations Standard Exception Form. Approval **shall** be obtained prior to commencing of any work that would otherwise fail to comply with the Standard.

9. REFERENCES

- Operations Standard Exception Process (OGB-CHK-QRC-001)
- Controlled Documents Standard (LGL-EXE-STD-001)
- Clean Water Act
- Endangered Species Act
- Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines
- Records Retention Schedule

10. DOCUMENT CONTROL TABLE

Title: Environmental Site Assessment Standard		Document Number: HSER-ENV-EXE-STD-035		
Next Review Date: 6/1/2028				
Originating Department: HSER				
Version History				
Version	Issue Date	Description	Author(s)	Approved By
1.0	06/01/2025	Created Expand Energy HSER Standard.	Eric Dean	OGB