



Waste Management Standard

1. PURPOSE

This standard provides the minimum requirements for managing waste generated during all phases of activities by or on behalf of Expand Energy Corporation (EXE) at Expand locations.

2. SCOPE

This Standard is applicable to employees of Expand Energy (EXE), its affiliates or subsidiaries performing work on Expand properties or on the company's behalf.

Contractors **shall** have their own Standards that meet or exceed regulatory requirements.

3. DEFINITIONS

Ancillary Facility – Temporary or permanent site leased, owned and/or operated by Expand or subsidiary in support of E&P (Exploration and Production) operations. Examples include produced water treatment facilities, thermal desorption unit facilities, equipment manufacturing/paint shops, storage yards, laboratories, and corporate headquarters. The sites may be related to waste processing or may generate or store a variety of wastes.

Disposal – Final disposition of waste material including, but not limited to, deposition at a permitted facility for permanent storage of waste or satisfactory closure of on-site waste pit.

Exploration and Production (E&P) Exempt Waste – Wastes which meet the federal regulatory criteria to be characterized as exempt from the hazardous waste regulations: 40 CFR (Code of Federal Regulations) 261.4 (b)(5) and other regulatory guidance.

Hazardous Waste – Wastes that meet applicable state or federal regulatory definition of hazardous waste by being listed and/or by exhibiting one or more characteristics of hazardous waste—ignitable, corrosive, reactive or toxic.

Nonhazardous Waste – Waste that is by regulation nonhazardous and/or has been characterized and is neither listed nor meets one or more characteristics of hazardous waste. Nonhazardous wastes include E&P exempt and industrial nonhazardous wastes.

NORM – An acronym for Naturally Occurring Radioactive Material, which includes all naturally occurring radioactive elements in the environment. NORM may also be referred to as Technologically Enhanced NORM (“TENORM”) by various regulatory entities to distinguish radionuclide concentrations which have been concentrated or increased by or as a result of industrial processes.

Universal Waste – Hazardous wastes with special regulatory status intended to encourage proper management and recycling at 40 CFR 273. At the federal level, these include specific types of batteries, specific types of pesticides, mercury-containing equipment, light bulbs containing mercury and other heavy metals and aerosol cans. States may add other waste streams to universal waste regulation.

Waste – Unwanted or unusable items, remains, byproducts, or garbage.

Shall – denotes a minimum requirement to conform to the Standard; to aid the reader, “shall” requirements are identified in bold.

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

4. ROLES & RESPONSIBILITIES

Waste management at Expand requires communication and coordination between Operations — who is responsible for managing exploration and production (E&P) waste — and Health, Safety, Environmental and Regulatory (HSER), who provide resources and expertise in complying with regulations and who manage hazardous and universal wastes.

4.1. FIELD OPERATIONS

- Ensure waste is managed as described in this Standard and the Regional Waste Management Plan (RWMP)
- Ensure operations personnel attend assigned waste training
- Assign responsibility for managing production, drilling and completions wastes
- Assign role of Nonhazardous Waste Manifest Signer to a sufficient number of operations personnel and/or Third-Party Nonhazardous Waste Manifest Signer to a sufficient number of contractors, based on available resources and anticipated activity level in the business unit (BU)
- Communicate changes in operations to HSER that may impact wastes generated and their management
- Work with Waste Plan Administrator (WPA) to update the RWMP periodically
- Store and label operational wastes according to the RWMP
- Decide disposition for operations nonhazardous wastes, based on options available in the BU, which are provided by HSER
- Arrange for disposal of operations nonhazardous waste using approved waste vendors

4.2. REGIONAL WASTE PLAN ADMINISTRATOR (WPA)

- Create and maintain RWMP(s)
- Manage hazardous and universal wastes for the assigned region, including signing hazardous waste manifests (see role 4.5, Hazardous Waste Manifest Signer)
- Responsible for regional tasks associated with waste vendor evaluation
- Characterize waste streams and evaluate options for disposition across operating area
- Maintain third party manifest signer documentation

4.3. CORPORATE WASTE REPRESENTATIVE

- Maintain and periodically assess the Standard, Procedures, and training materials, ensuring compliance with federal, state, and local requirements as well as industry best practices
- Conduct and coordinate waste-related training and update curriculum
- Support BU with waste characterization and disposition options
- Act as a point-of-contact for Expand in internal and external matters related to waste
- Oversee waste vendor evaluation and coordinate with field
- Conduct periodic review of waste management documentation to ensure vendors include required documentation

4.4. NONHAZARDOUS WASTE MANIFEST SIGNER, INCLUDING THIRD-PARTY

- Attend periodic waste training
- Act as signatory representative on behalf of Expand for shipments of nonhazardous wastes being transported for treatment or disposal in permitted waste facility

4.5. HAZARDOUS WASTE MANIFEST SIGNER

- The WPA for the region **shall** be assigned this role by BU HSER leadership
- Complete in-depth waste characterization and DOT training as assigned
- Act as signatory representative for shipments of hazardous waste or DOT Class 7 NORM
- Third-party signers may be approved by the RWPA

5. REQUIREMENTS

Each Expand site complies with the waste regulations applicable to its generator status, which is based on hazardous waste monthly generation rate and total accumulation. Most of EXE's exploration and production wastes — **when properly managed** — are exempt from counting toward a site's hazardous waste accumulation.

5.1 GENERAL REQUIREMENTS

Waste management at Expand has seven key elements applicable to its E&P and ancillary facility operations:

- 1) Identify all wastes generated, evaluating and implementing strategies that reduce or eliminate quantities generated

- 2) Characterize waste streams based on regulatory status and decide best disposition considering the waste hierarchy (reuse, reclaim/recycle, dispose)
- 3) Store, label, and conduct periodic inspections according to local/state/federal and company requirements
- 4) Use qualified, licensed, permitted and approved vendors for waste transportation and disposal
- 5) Train employees in proper waste management
- 6) Communicate waste management expectations to contractors
- 7) Document waste characterization and disposition and retain as required per EXE retention schedule

5.2 REGIONAL WASTE MANAGEMENT PLANS

The core of Expand Energy's waste management is the Regional Waste Management Plan (RWMP), created and maintained by the WPA at the BU level. Each BU can have as many plans as necessary to address significant variations of basic plan elements that exist within a BU. RWMP list the BU's waste streams, waste characterization, available and preferred management practices, storage and labelling requirements prior to final disposition, approved waste vendors and local Expand personnel with waste roles. The WPA and BU operations review and update plans on a regular basis. See the Waste Handling and Documentation Procedure.

5.3 THIRD PARTY WASTE VENDORS

Expand endeavors to do business with vendors who share our core values and who operate with integrity, trust and respect for people and the environment. On site contractors who come on Expand locations are approved and onboarded through the HSER Contractor Management Standard.

Disposal facilities are evaluated and approved through desktop reviews and site visits. They may also be onboarded through Supply Chain. With few exceptions in emergency situations, only approved or exempted vendors **shall** be used to treat, haul or dispose of the company's waste. See the Waste Handling and Documentation Procedure.

5.4 CONTRACTOR WASTE

Contractors **shall not** mix their hazardous or universal wastes with EXE waste without approval of the WPA and as described in the RWMP.

6. TRAINING

EXE's suggested training matrix is shown in the table below:

Training Module	Who Attends	Frequency	Training Delivery	General Content
Waste Awareness	All Employees	One time	KPA	Waste Management Standard Awareness
RCRA Waste Management	Environmental personnel in role of Waste Plan Administrator (WPA)	Triennial	Instructor led	RCRA hazardous waste characterization and function specific DOT shipping (including Class 7 NORM)
DOT	WPA and other employees who prepare shipments of hazardous materials and sign hazardous materials shipping papers	Triennial	Third-party (web or instructor lead)	Regulatory required training for ground shipping hazardous materials
Universal Waste Battery Management	Universal Waste Battery Coordinators	One time	Instructor led	Procedures for managing dry cell universal waste batteries
Spent Lead Acid Battery Management	Spent Lead Acid Battery Coordinators	One time	Instructor led	Storage and documentation requirements for managing spent lead acid batteries being reclaimed compliant with 40 CFR 266

If a facility changes generator status from VSQG (Very Small Quantity Generator), in-depth RCRA hazardous waste training **shall** be completed annually for all facility employees who handle hazardous waste.

7. AUDIT REQUIREMENTS

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

8. STANDARD EXCEPTIONS

Requirements outlined in this Standard **shall** be followed, unless a Standard Exception is filed on behalf of, and with the approval of the Area Manager. The Company’s Standard Exception Form is to be utilized to properly document any exceptions.

9. REFERENCES

- Waste Handling and Documentation Procedure
- NORM Standard
- 40 CFR 239-280
- Various policy guidance documents pertaining to RCRA; accessed from RCRA Online website

- “Exemption of Oil and Gas Exploration and Production Wastes from Federal Hazardous Waste Regulations,” USEPA, October 2002)
- EXE Records Retention Policy

10. DOCUMENT CONTROL TABLE

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Version	Issue Date	Description	Author(s)	Approved By
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