Incident Reporting and Management

Standard

CONTENTS

1 PURPOSE

Proper management of worksite incidents and near misses – also referred to as *Unplanned Events* – may significantly decrease the impact severity, provide an opportunity to learn and avoid recurrences. Whether an event results in an injury, environmental impact, equipment damage, or only had the potential for these undesirable results, follow-up is required. This Standard outlines Expand Energy's (EXE's) expectations for an event's initial response, risk categorization, investigation, corrective actions, and reporting.

2 SCOPE

This Standard applies to all Expand operations including: subsidiaries, affiliated companies, and joint ventures where Expand is the operator or majority owner. Contractors **shall** have their own process that satisfies regulatory requirements.

3 DEFINITIONS

Causal Factor	An issue that contributed to an unplanned event or influenced its outcome; it may or may not be the Root Cause. There may be multiple causal factors for an unplanned event.
Incident	An unplanned event resulting in an injury, illness, environmental release (i.e., spill/air) or facility/equipment damage
Near Miss	An unplanned event with the potential for causing an injury or illness, environmental release (i.e., spill/air) or facility/equipment damage, but did not
PSE – Process Safety Event	An unplanned or uncontrolled release of material from a process with undesirable consequences to personnel, the environment, facility, or nearby community. Tiers 1-2 indicate the PSE severity

Root Cause	The factor that, if removed from the sequence of events, would prevent the unplanned event from occurring. There is usually only 1 root cause
Primary Containment	A tank, vessel, pipe, or other equipment designed to keep material within it, typically for the purposes of storage, separation, processing or transfer for material
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
SIF – Serious Incident or Fatality	An event resulting in a fatal, life-altering, or life-threatening injury or illness; significant environmental damage; or substantial damage to facilities or equipment. Sub-categories include Actual, Potential, Mitigated, and Non-SIF events
Unplanned Event or “Event”	An undesirable occurrence outside the scope of planned work that may result in an incident or near miss

4 RESPONSIBILITIES

4.1 EMPLOYEES

- Comply with the requirements of this Standard
- Immediately notify your direct or worksite supervisor and HSER of any incident or near miss
- Follow instructions from onsite supervisors, company leadership, HSER, and response personnel during an incident response
- Cooperate with investigation team requests, including participating as a team member and providing accurate witness statements

4.2 MANAGEMENT

- Provide resources to implement this Standard
- Promote and enforce compliance with this Standard
- Ensure incidents and near misses are reported immediately and investigated per the expectations set forth in this Standard
- Lead, participate in, or support investigation activities
- Review event facts and investigation findings to ensure:

- All causal factors are identified
- Corrective actions and other investigation recommendations address the causal factors and are acted upon in a timely manner to avoid recurrence
- Safety Shares are generated and communicated to site workers, other BUs, and the industry, as appropriate

4.3 HEALTH, SAFETY, ENVIRONMENTAL AND REGULATORY (HSER)

- Maintain this Standard; record events, investigations, and corrective actions in the Incident Management Database (IMD); and facilitate training on Standard requirements
- Generate incident reports and make them readily available to management and staff
- Facilitate and assist with investigations as necessary
- Work with Operations to assign event Severity Levels using the *Operational Risk Matrix **(Section 6.1)*** based on actual consequences and the IMD risk category. When events have higher potential risks than actual consequences, assign using the SIF classification.
- Ensure the RCA Tracker is regularly updated to reflect the progress of all ongoing RCA investigations. Oversee the tracking process to confirm that each investigation is advancing toward timely closure, and address any delays or issues that may arise.

4.4 LEGAL

- Provide legal guidance to leadership, response efforts, and investigation teams on external notifications, media interaction, legal privilege, published reports, and official correspondence regarding incidents

4.5 CONTRACTOR MANAGEMENT

- Contractors are required to report the following types of incidents immediately to an Expand Representative:
  - Injury.
  - Illness.
  - Air release.
  - Property damage.
  - Near miss.
  - Permit violation.
  - Spill of product from primary containment.
- Contractors are required to investigate reported incidents:
  - Incidents must be investigated to determine the root cause(s).
  - Corrective actions must be implemented to prevent recurrence.
  - Final investigation report(s) and corrective actions **shall** be supplied to an Expand representative within 30 days post-incident when requested.

5 INITIAL RESPONSE

5.1 PRINCIPLES & KEY STEPS

The first steps taken after an unplanned event are crucial for preserving lives, minimizing injuries and damage, and preserving an opportunity to learn from the event. Workers should be trained to perform the following steps in order:

1. **Take control of the scene** – Respond to the incident with a focus on life safety, stabilizing the incident and protecting the environment. Get everyone's attention and evacuate the area if necessary. Assess the situation and call first responders. If safe to do so, make assignments to secure the site, activate emergency shutdowns, shut off power, care for wounded and direct traffic.
2. **Provide first aid & call for emergency services** – Prior to calling for emergency services, quickly assess those injured to determine the extent of their injuries and what they need. If trained, provide first aid, stabilize the wounded, and make them as comfortable as possible while waiting.
3. **Control secondary incidents** – An unplanned event may create new hazards not anticipated in the original scope of work. Tape off or erect barricades around unsafe equipment or site conditions, slow people down, and watch out for those who are visibly upset.
4. **Identify & preserve evidence** – Evidence may include equipment positions, tools, materials, permits and other paperwork, and witness statements. Identify possible evidence as soon as possible and preserve it for the investigation team.
5. **Initiate the Emergency Response Plan (ERP) as required** – If the worksite cannot be immediately stabilized and made safe after an event, the site's ERP should be activated to manage with the longer-term response and recovery.
6. **Notify appropriate company leadership and regulators** – Company leaders need to be informed as soon as possible after an event (depending on the nature of the injuries and damage). They can assist by providing guidance and additional response resources, and they need to be informed to respond to regulator and media questions.
   NOTE** – Notify Expand leadership per the **Incident Reporting Requirements** matrix **(Section 5.3)**, and regulators per **Appendix 11.5
7. **Perform initial Impact Severity Assessment** (to guide further actions) – It is important to assess the actual and potential consequences of the event (whether incident or near miss) to determine its severity and level of investigation that **shall** follow.

5.2 CASE MANAGEMENT (AXIOM)

Expand has contracted Axiom – a professional medical intervention company staffed by licensed doctors and nurses – to provide the initial medical contact and preliminary diagnosis of injured workers by telephone and recommend the next steps of care. Axiom ensures workers receive prompt and appropriate care for work-related injuries.

Expand employees **shall** contact Axiom for all work-related injuries – regardless of how minor. If an injury requires immediate medical treatment, call 911 first and then Axiom.

Axiom's case management process is as follows:

- Call the company's dedicated number - **877-502-9466**
- Speak with an Axiom nurse and complete an assessment
- If hands-on professional medical care is needed, Axiom will recommend an appropriate hospital, clinic, and/or doctor for further treatment. They will then call that facility/doctor to help prepare them for the patient's arrival.
- If self-care is recommended, the nurse will provide instructions
- Axiom will make follow-up calls to the injured person to discuss ongoing needs until the patient's recovery is complete

***NOTE** (for 3rd Party Contractors) – each company is required to have their own case management process*

5.3 Initial Reporting & Recording

Once an event site has been stabilized and immediate medical issues addressed, the onsite supervisor, team lead, or designee **shall** notify specific company leaders and department representatives of the event per the ***Incident Reporting Requirements*** table (below).

Expand is also required to report certain incidents to local, state, and federal regulatory agencies in accordance with permit requirements, established rules, and regulations (see ***Section 7.1, Regulatory Agency Reporting*** and ***Appendix 11.5, External Notification Reporting Requirements)***.

HSER is responsible for external regulatory reporting in accordance with agency reporting thresholds and timeframes.

HSER **shall** make the initial entry into the Incident Management Database (IMD) within 24 hours of the event and include the following information:

- Pre-investigation facts (site name, activity taking place at the time of the event, type of event, unique circumstances, and nature of injuries or damage)
- Immediate actions taken
- Level of investigation required

Incident Reporting Requirements

Incident Type	Onsite or Immediate Supv.	Team Lead or Manager	HSER Rep.	HR	Business Unit VP	Legal	Risk & Workers Comp Manager	Fleet	Initial IMD Entry
Timing:	Immediate Phone Notification								within 24 hours
First Aid	✓	✓	✓						✓
Occupational Health Exposure	✓	✓	✓						✓
Medical Treatment Only	✓	✓	✓		✓				✓
Restriction / Job Transfer	✓	✓	✓	✓	✓		✓		✓
Days Away from Work[1]	✓	✓	✓	✓	✓	✓	✓		✓
Hospitalization	✓	✓	✓	✓	✓	✓	✓		
Death[1,2]	✓	✓	✓	✓	✓	✓	✓		✓
Fire[1,2]	✓	✓	✓		✓	✓			✓
Vehicle Collision[2]	✓	✓	✓	✓				✓	✓
Vehicle Collision Injury[2]	✓	✓	✓		✓	✓		✓	✓
Near Miss	✓	✓	✓						✓
Company Property Damage	✓	✓	✓						✓
Evacuation / Shelter-In-Place	✓	✓	✓		✓	✓			
Well Control Incident	✓	✓	✓		✓				
Spill / Release (Reportable)[1]	✓	✓	✓		✓	✓			✓
Spill / Release (Non-Reportable)	✓	✓	✓						✓
Terrorism Act or Media Attention	✓	✓	✓		✓	✓			✓

[1]Report promptly to enable timely notification to regulatory agencies

[2]If available, obtain the police accident/incident report

5.4 VEHICLE INCIDENTS

In addition to the response requirements listed above, a post accident drug and alcohol screening is typically required for drivers of company vehicles involved in an at fault MVA. No fault MVA testing will be up to the employee's manager. If needed, consult with the Designated Employee Representative (DER) in Corporate Security.

For vehicle incidents that result in an injury, the classification will follow the risk matrix. All other vehicle incidents will be evaluated using the vehicle crash calculator to determine whether they qualify as a Serious Incident or Fatality (SIF) event.

NOTE: Work with DER on coordinating post-accident D&A test.

For additional vehicle requirements, refer to the Vehicle Use Policy.

6 INVESTIGATIONS

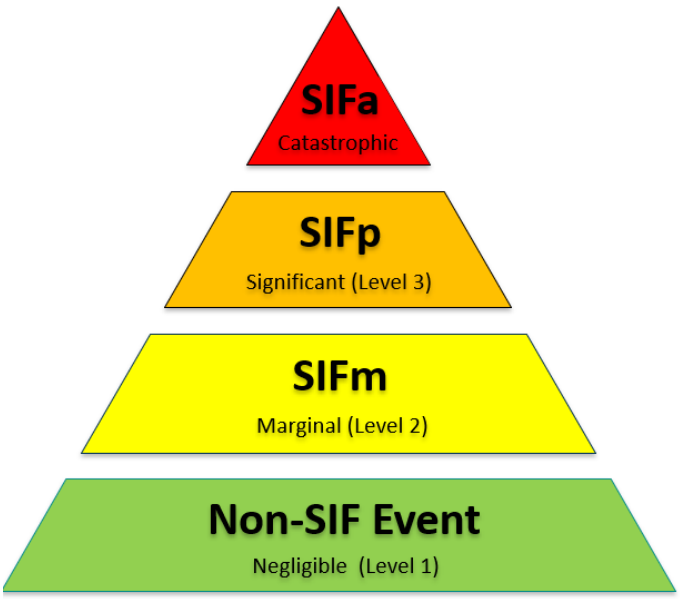
6.1 IMPACT SEVERITY AND SIF DESIGNATION

Perform an impact severity assessment to determine what level of investigation, if any, is needed and what level of company leadership and expertise should be involved. Operations and HSER leadership are responsible for this assessment.

Simplified investigations are generally acceptable for lower consequence and less complex events. These are typically conducted with local Operations and HSER staff and only involve those directly involved with the event and their supervisor.

Formal investigations are required for higher consequence and more complex events. Progress of investigations **shall** be tracked in the RCA tracker. These investigations typically include Operations, HSER, and technical experts; and they have more defined reporting and documentation requirements.

The ***SIF Investigation Triangle*** shows the hierarchy of Serious Incident & Fatal (SIF) events. The notes below the triangle define the type of investigation required for each level, who should lead it, and reporting requirements.



Use the following descriptions and **Appendix 11.1 – SIF Potential Indicators** to help determine whether an event qualifies as a SIF or had SIF potential. The designation or classification of a SIF will be determined by HSE and Operations supervision. If an agreement cannot be reached on the incident classification, the incident will be presented to the Operations Governance Council for a final determination.

In cases where the designation cannot be determined in the field, AXPC or IOGP guidance should be consulted. Refer to the **IOGP definitions for Fatality and Permanent Impairment injuries**.

SIFa (Actual SIF) – result in a fatality, serious (life-altering or life-threatening) injury or illness, significant environmental or facility damage, or a Loss of Primary Containment (LOPC) with catastrophic or significant consequences.

These events require a formal investigation be completed within 60 days (VP may grant an extension). Expand' s Executive Leadership Team (ELT) appoints a multi-discipline investigation team of Operations, HSER, and technical resources from outside the affected area or discipline that are independent investigators. Investigation findings are reviewed by Legal and presented to the ELT and ESG Board Committee.

SIFp (Potential SIF) – result in less severe, non-life-threatening injuries and environmental or facility damage, or they may not produce any injuries or damage at all, but they had the potential to be serious or fatal.

These events require a formal investigation be completed within 60 days (VP may grant an extension). The Operations and HSER VP approves a multi-discipline investigation team of Operations, HSER, and technical resources appointed by the Operations and HSER Managers. The findings are presented to the Operations Leadership Team.

SIFm (Mitigated SIF) – had the potential to be a SIF event, but controls were in place to prevent it.

A simplified investigation should be conducted by local Operations & HSER staff to verify critical controls were in place to mitigate the event. The findings are reviewed at the Operations and HSER Manager Meeting. A Safety Share is not required if all safe work practices and critical controls were in place.

***NOTE** – If controls were not in place, follow the SIFp process*.

Non-SIF Event – unplanned events that did not have the potential to cause serious injury or damage but may indicate an opportunity to strengthen the Operating Discipline and Management System to prevent more significant events from occurring in the future.

Use the following ***Operational Risk (Incident Severity) Matrix*** to identify the event's potential consequence severity.

***NOTE** – If the consequence category is identified as Significant (3) or Catastrophic (4), follow the SIF investigation process*.

Operational Risk (Incident Severity) Matrix

CATEGORY	IMPACT			
	HSE	Operational	Legal / Regulatory	Reputational
High (Catastrophic - Level 4) --- (Any residual risk remaining at this level requires EVP approval)	One or more fatalities	$10MM+	More than $10MM per NOV or action of Regulatory NOV that restricts license to operate	More than 10: - National, regional, or local media inquiries - Social media posts - National and/or local political or regulatory inquiries
	Spill, release, or complaint that calls for evacuation or sheltering-in-place to protect community health		$10MM+ litigation exposure	
Medium (Significant - Level 3) --- (Any residual risk remaining at this level requires VP approval)	Hospitalization resulting from occupational illness or injury	Less than $10MM	Less than $10MM per NOV and/or a pattern of related NOVs	Less than 10: - National, regional, or local media inquiries - Social media posts - National and/or local political or regulatory inquiries
	Spill, release, or complaint that requires immediate notification to the National Response Center and state authorities		Less than $10MM litigation exposure	
Low (Marginal - Level 2) --- (Any residual risk remaining at this level requires VP approval)	OSHA-recordable injury	Less than $500K	Less than $500K per NOV	Less than 5: - Regional media inquiries - Social media posts
	Spill, release, or complaint that requires notification to a regulatory agency		Less than $500K litigation exposure	
Negligible (Level 1) --- (Any residual risk remaining at this level requires VP approval)	Non OSHA-recordable injury	Less than $200K	Less than $200K per NOV	- No media coverage - No political/regulatory calls - No social media posts
	Spill, release, or complaint not requiring a notification to a regulatory agency		Less than $200K litigation exposure	

6.2 PROCESS SAFETY EVENT (PSE) TIER DESCRIPTIONS

This section, and ***Appendix 11.3,*** were adapted from ***IOGP Report 456, Process Safety – Recommended Practice on Key Performance Indictors*****,** which is aligned with API RP-754, *Process Safety Performance Indicators for the Refining and Petrochemical Industries.*Use the following descriptions to determine an event's PSE Tier Level. ***Table 6.2.1*** (below) and ***Appendix 11.3*** provide additional detail to assist in making these determinations.

Tier 1 PSE – Loss of Primary Containment (LOPC) with Greater Consequences

An unplanned or uncontrolled release of any material, including non-toxic and non-flammable (steam, hot water, nitrogen, compressed CO2 or air, etc.), from a process resulting in one or more of the following:

- Employee, contractor, or 3rd party lost work day injury, hospitalization, or fatality
- An officially-declared community evacuation or shelter-in-place, including precautionary declarations
- Fire or explosion damage with a repair cost greater than $100,000.
- A pressure-relief (PRD, SIS, or manually-initiated emergency de-pressure) or upset emission from a permitted or regulated source to atmosphere above the Tier 1 Threshold Quantities listed in ***Table 6.2.1*** and resulting in one or more of the following:
  - A rainout
  - A discharge to a potentially unsafe location.
  - An on-site shelter-in-place or evacuation, excluding precautionary declarations
  - Public protective measures (road closure, etc.), including precautionary measures.
- An unignited release greater than the Tier 1 Threshold Quantities listed in ***Table 6.2.1***, excluding planned and engineered pressure-relief discharges and upset emissions from permitted or regulated sources.

Tier 2 PSE – Loss of Primary Containment (LOPC) with Lesser Consequences

Even a LOPC that has been captured within secondary containment can indicate barrier system weaknesses that may cause future, more significant events. Similar to a Tier 1, a Tier 2 PSE is an unplanned or uncontrolled release of any material from a process resulting in one or more of the following:

- Employee or contractor recordable injury
- Fire or explosion damage with a repair cost of $2,500 - $100,000
- A pressure-relief (PRD, SIS, or manually-initiated emergency de-pressure) or upset emission from a permitted or regulated source to atmosphere above the

Tier 2 Threshold Quantities listed in ***Table 6.2.1*** and resulting in one or more of the following:

- A rainout
- A discharge to a potentially unsafe location.
- An on-site shelter-in-place or evacuation, excluding precautionary declarations
- Public protective measures (road closure, etc.), including precautionary measures.

- An unignited release greater than Tier 2 Threshold Quantities listed in ***Table 6.2.1***, excluding planned and engineered pressure-relief discharges and upset emissions from permitted or regulated sources.

Refer to IOGP Report 456 for additional examples of Tier 1 or Tier 2 PSEs.

Table 6.2.1 – Material Release Threshold Quantities (from API RP 754) – page 1/3

Threshold Release Category	Material Hazard Classification Option 1	Material Hazard Classification Option 2	Tier 1		Tier 2	
			Threshold Quantity (Outdoor)	Threshold Quantity (Indoor)	Threshold Quantity (Outdoor)	Threshold Quantity (Indoor)
TRC 1	TIH Zone A materials	H330 Fatal if inhaled, acute toxicity, inhalation (ch. 3.1) (cat. 1)	≥ 5 kg (11 lb)	≥ 0.5 kg (1.1 lb)	≥ 0.5 kg (1.1 lb)	≥ 0.25 kg (0.55 lb)
TRC 2	TIH Zone B materials	H330 Fatal if inhaled, acute toxicity, inhalation (ch. 3.1) (cat. 2)	≥ 25 kg (55 lb)	≥ 2.5 kg (5.5 lb)	≥ 2.5 kg (5.5 lb)	≥ 1.25 kg (2.75 lb)
TRC 3	TIH Zone C materials	H331 Toxic if inhaled, acute toxicity, inhalation (ch. 3.1) (cat. 3)	≥ 100 kg (220 lb)	≥ 10 kg (22 lb)	≥ 10 kg (22 lb)	≥ 5 kg (11 lb)
TRC 4	TIH Zone D materials	H332 Harmful if inhaled, acute toxicity, inhalation (ch. 3.1) (cat. 4)	≥ 200 kg (440 lb)	≥ 20 kg (44 lb)	≥ 20 kg (44 lb)	≥ 10 kg (22 lb)
TRC 5	Flammable gases	H220 Extremely flammable gas, flammable gases (ch. 2.2) (cat. 1A) H221 Flammable gas, flammable gases (ch. 2.2) (cat. 1B,2)	≥ 500 kg (1100 lb)	≥ 50 kg (110 lb)	≥ 50 kg (110 lb)	≥ 25 kg (55 lb)
	Liquids with normal boiling point ≤ 35 °C (95 °F) and flash point < 23 °C (73 °F)	H224 Extremely flammable liquid and vapor, flammable liquids (ch. 2.6) (cat. 1)				
	Other Packing Group I materials (excluding acids/bases and excluding UNDG Class 1; Class 2.2; Class 4.2; Class 4.3; Class 7; and Class 9 materials)	H228 Flammable solid, flammable solids (ch. 2.7) (cat. 1,2) H230 May react explosively even in the absence of air, flammable gases (ch. 2.2) (chemically unstable gas cat. A) H231 May react explosively even in the absence of air at elevated pressure and/or temperature, flammable gases (ch. 2.2) (chemically unstable gas cat. B) H232 May ignite spontaneously if exposed to air, flammable gases (ch. 2.2) (cat. 1A pyrophoric gas) H250 Catches fire spontaneously if exposed to air, pyrophoric liquids and pyrophoric solids (ch. 2.9 & 2.10) (cat. 1) H310 Fatal in contact with skin, acute toxicity, dermal (ch. 3.1) (cat. 1)				

Material Release Threshold Quantities (from API RP 754) – page 2/3

Threshold Release Category	Material Hazard Classification Option 1	Material Hazard Classification Option 2	Tier 1 Threshold Quantity (Outdoor)	Tier 1 Threshold Quantity (Indoor)	Tier 2 Threshold Quantity (Outdoor)	Tier 2 Threshold Quantity (Indoor)
TRC 6	Liquids with normal boiling point > 35 °C (95 °F) and flash point < 23 °C (73°F)	H225 Highly flammable liquid and vapor, flammable liquids (ch. 2.6) (cat. 2)	≥ 1000 kg (2200 lb) or ≥ 7 oil bbl	≥ 100 kg (220 lb) or ≥ 0.7 oil bbl	≥ 100 kg (220 lb) or ≥ 0.7 oil bbl	≥ 50 kg (110 lb) or ≥ 0.35 oil bbl
	Crude oil ≥ 15 API Gravity (unless actual flash point available)	Crude oil ≥ 15 API Gravity (unless actual flash point available)				
	Other Packing Group II materials (excluding acids/bases and excluding UNDG Class 1; Class 2.2; Class 4.2; Class 4.3; Class 7; and Class 9 materials)	H240 Heating may cause an explosion, self-reactive substances and mixtures and organic peroxides (ch. 2.8 & 2.15) (type A) H241 Heating may cause a fire or explosion, self-reactive substances and mixtures and organic peroxides (ch. 2.8 & 2.15) (type B) H242 Heating may cause a fire, self-reactive substances and mixtures and organic peroxides (ch. 2.8 & 2.15) (types C–F) H271 May cause fire or explosion; strong oxidizer, oxidizing liquids and oxidizing solids (ch. 2.13 & 2.14) (cat. 1) H310 Fatal in contact with skin, acute toxicity, dermal (ch. 3.1) (cat. 2)				
TRC 7	Liquids with flash point ≥ 23 °C (73 °F) and ≤ 60 °C (140 °F)	H226 Flammable liquid and vapor, flammable liquids (ch. 2.6) (cat. 3)	≥ 2000 kg (4400 lb) or ≥ 14 oil bbl	≥ 200 kg (440 lb) or ≥ 1.4 oil bbl	≥ 200 kg (440 lb) or ≥ 1.4 oil bbl	≥ 100 kg (220 lb) or ≥ 0.7 oil bbl
	Liquids with flash point > 60 °C (140 °F) released at a temperature at or above flash point	H227 Combustible liquid, flammable liquids (ch. 2.6) (cat. 4) [**Released at a temperature at or above flash point **] Liquids with flash point > 93 °C (200 °F) released at a temperature at or above flash point				
	Crude oil < 15 API Gravity (unless actual flash point available)	Crude oil < 15 API Gravity (unless actual flash point available)				
	UNDG Class 2, Division 2.2 (non-flammable, non-toxic gases) excluding air	H270 May cause or intensify fire; oxidizer oxidizing gases (ch. 2.4) (cat. 1) UNDG Class 2, Division 2.2 (non-flammable, non-toxic gases) excluding air				
	Other Packing Group III materials (excluding acids/bases and excluding UNDG Class 1; Class 2.2; Class 4.2; Class 4.3; Class 7; and Class 9 materials)	H272 May intensify fire; oxidizer, oxidizing liquids and oxidizing solids (ch. 2.13 & 2.14) (cat. 2,3) H311 Toxic in contact with skin, acute toxicity, dermal (ch. 3.1) (cat. 3)				

Table 6.2.1 – Material Release Threshold Quantities (from API RP 754) – page 3/3

Threshold Release Category	Material Hazard Classification Option 1	Material Hazard Classification Option 2	Tier 1 Threshold Quantity (Outdoor)	Tier 1 Threshold Quantity (Indoor)	Tier 2 Threshold Quantity (Outdoor)	Tier 2 Threshold Quantity (Indoor)
TRC 8	Liquids with flash point > 60 °C (140 °F) and ≤ 93 °C (200 °F) released at a temperature below flash point	H227 Combustible liquid, flammable liquids (ch. 2.6) (cat. 4) [**Released at a temperature below flash point **]	N/A	N/A	≥ 1000 kg (2200 lb) or ≥ 7 oil bbl	≥ 500 kg (1100 lb) or ≥ 3.5 oil bbl
	Strong acids/bases (see definition 3.1.2)	H314 Causes severe skin burns, skin corrosion/irritation (ch. 3.2) (cat. 1A)				
	No equivalent	H370 Causes damage to organs, specific target organ toxicity, single exposure (ch. 3.8) (cat. 1)				

NOTE 1 It is recognized that threshold quantities given in kg or lb and bbl are not exactly equivalent. Companies should select one of the pair and use it consistently for all recordkeeping activities.
NOTE 2 Refer to 5.2.3 for guidance on selecting the correct TRC and the use of material hazard classification Option 1 and Option 2.

6.3 INVESTIGATION RESPONSIBILITIES

6.3.1 Company Leadership & HSER

- Consult with Legal prior to initiating an investigation for any SIFa, or Catastrophic event to determine what restrictions or guidance may apply and whether the investigation should be conducted under Legal Privilege
- Based on the SIF designation from ***Step 6.1***, the appropriate level of company leadership and HSER **shall** appoint an Investigation Team Lead and team members
- Ensure the team makeup is sufficient to cover the operational, technical and regulatory aspects of the event

6.3.2 Investigation Team Lead

- Lead the team responsible for investigating the unplanned event; the individual assigned this role is selected based on the Investigation Tier
- Ensure the team makeup covers all essential skill sets for the event and has adequate representation from operational, technical, and contractor staff
- Instruct team members on how the investigation will proceed and their responsibilities
- Ensure the confidentiality of the investigation materials and information, control the flow of information on the investigation's progress, and release information only when it is prudent or necessary to do so or where required by law to authorized individuals only
- Complete the written investigation report and file it in the IMD with guidance from Legal and Expand leadership
- Schedule review meetings per the expectations of company leadership and this Standard

6.3.3 Team Members

- Prioritize team activities (inspections, interviews, data gathering, etc.) and meetings over normal work responsibilities
- Share your expertise with the team and lead out in those areas during interviews and data gathering; help the team build the most complete and accurate picture of the event possible
- Support the Team Lead and other members in their responsibilities
- Post-investigation, share investigation findings and corrective actions amongst the workforce

6.4 FORMAL INVESTIGATION

6.4.1 Kick-off

The Team Lead gathers all available evidence collected from the event thus far and schedules the Investigation Kick-off Meeting, witness interviews and initial data gathering dates and locations. The Lead should also arrange for a team meeting room and other team logistical needs (transportation, lodging, meals, etc.)

Formal investigations should kick off with a meeting between initial response personnel, company leadership from the worksite and/or asset, and the Investigation Team. This may be considered the official handover from the initial response team to the investigation team. Agenda items should include a review of known evidence and data, schedule of team activities, expectations of team members and supporting leadership (including the need for confidentiality throughout the investigation), and a projection of when the investigation results will be presented.

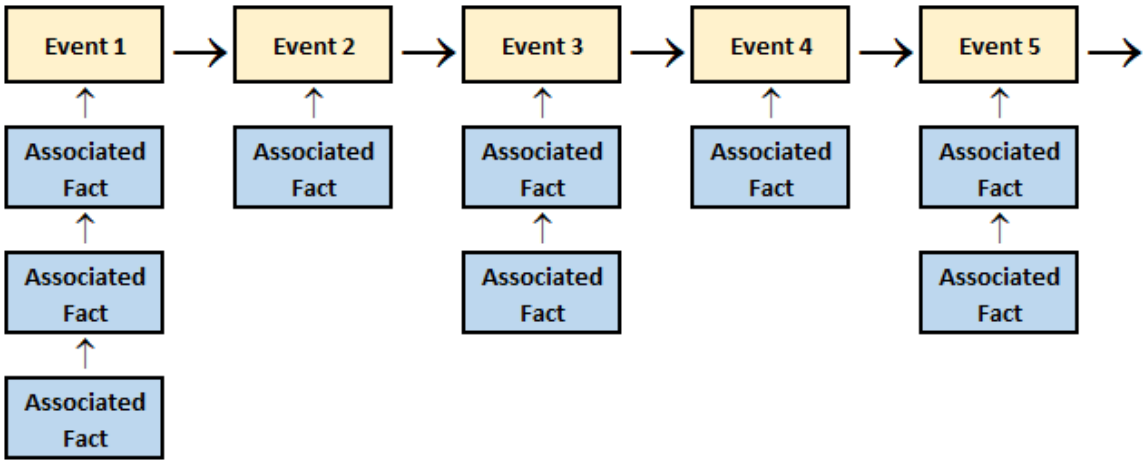
6.4.2 Process

Formal Investigation will require a Root Cause Analysis investigation methodology. Regardless of which investigation methodology (TapRoot, Root Cause Analysis, etc.) is used to guide the process, formal investigations should generally proceed as follows:

1. **Gather evidence** – Evidence gathering should have begun as soon as the incident or near miss site was brought back under control. The investigation team reviews this evidence and determines what else needs to be learned from site visits and interviews with eyewitnesses and technical experts. The team should include all four "*P's of Evidence":*
    - **Physical / Position** – Where were the people, tools, equipment, and facilities in relation to each other before and after the event? Take pictures, make diagrams, ask those who were at the site during the event.
    - **People** – Interview those working at the site that day and others familiar with the site or day's activity. Allow them to talk freely, and don't try to guide their answers. Ask open questions to get their whole story.

        ***NOTE** – Assure them of their immunity to encourage them to speak freely. It is better to learn from the event than to discipline.*
    - **Photo / Video** – Review any pictures taken before, during, or after the event at the site; include any videos or pictures taken from site surveillance cameras.
    - **Paper** – Look at all documents that may have a bearing on the event (site drawings, work procedures, permits, material specifications, prior inspections, maintenance records, etc.).

2. **Construct a Timeline of Events** – From the evidence gathered, construct a timeline showing the sequence of events leading up to the unplanned event and beyond. The timeline may begin on the day of the event, or, depending on the nature of the incident, it may need to begin months or years before to capture all the associated facts. Example timeline shown below.



3. **Identify Causal Factors** – Designate the associated facts that contributed to the unplanned event or influenced its outcome as Causal Factors. A fact or circumstance that did not contribute to the undesirable event, even if unplanned and/or negative, is not a causal factor. A causal factor may or may not be the Root Cause. There are likely multiple causal factors for an unplanned event, while there is typically only one or very few root causes.
4. **Identify the Root Cause(s)** – The Root Cause is the factor that if removed from the sequence of events prevents the unplanned event from occurring.
5. **Recommend Corrective Actions** – Once the Root Cause(s) has been identified, recommend corrective actions that will prevent recurrence. The investigation team only recommends corrective actions; it is up to worksite leadership to determine what the actual corrective actions will be, justify them to higher management (and possibly regulatory agencies), and implement the changes within an approved timeframe. Corrective actions require an owner and a due date.

6.4.3 Investigator Training

The person leading the formal investigation method should be trained in the methodology used to guide the investigation process (TapRoot, RCA, etc.). They should also be advised by Legal, HSER, and possibly HR, on the importance of maintaining confidentiality until the final presentation and report are approved and controlling the information flow beyond the team.

6.5 INVESTIGATION FOLLOW-UP

6.5.1 Final Presentation

Before submitting the final report, the investigation team should present their findings and conclusions to company leadership (refer to Section 6.1, Risk Assessment & SIF Designation, to determine which company leaders should attend). This presentation ensures all pertinent issues were covered, leaders' questions were answered, and it allows the team to receive any final guidance. These presentations **shall** include:

- Incident overview and timeline
- Investigation team members
- Diagrams/photos of the event site and other relevant evidence
- Immediate actions taken
- Root cause(s) & contributing (causal) factors
- Corrective actions with assigned owner & due date
    - Track corrective actions to closer

  Note: All presentations **shall** utilize the Final Investigation Expectations Template located on the HSER SharePoint site.

6.5.2 Final Report Content and Timeline

Conclude formal investigations with a written Investigation Report within 60 days from the date of the incident unless the circumstances of the investigation require additional time. Extensions must be approved by the VP of HSER. The report must be reviewed and approved by Legal before releasing to the broader company. Simplified investigations do not require a written report or Legal approval.

The Investigation Report **shall** contain all the material from the Final Presentation plus applicable items referenced below:

- Interview summaries
- Photographs, videos, drawings, and sketches
- Analytical material
- Inventory of associated physical evidence and supporting documentation
- Post-presentation management conclusions

6.5.3 Report Approval

SIFa investigation reports are reviewed by Legal and presented to the ELT for approval. Reports will be reviewed with the ESG Board Committee.

SIFp investigation reports **shall** be approved by the BU VP and HSER VP. The BU VP will update the Operations Leadership Team on the status of the investigation and corrective actions.

Final investigation reports **shall** be retained in accordance with OSHA and other regulatory agency requirements. Investigation team members will turn over all evidence and files associated with the investigation to the asset's HSER Supervisor or Representative for proper disposal or storage.

6.6 COMMUNICATING SAFETY SHARES

Once the investigation report is approved, HSER will generate a "Safety Share" to summarize the event, investigation findings, and corrective actions for companywide distribution.

SIFa events require a Safety Share summary be communicated to all employees and select contractors. SIFp Safety Shares are recommended, but optional; the BU Manager and HSER will determine when a communication is warranted and for what audience. For all other events, the Investigation Team Lead will confer with HSER to determine if the Safety Shares should be communicated.

Subject to any policy, process, procedure or other Legal advice, the summary **shall** be reviewed with all affected personnel whose job tasks are relevant to the incident findings including contract employees where applicable. Attorney-Client privileged communications **shall** be managed by Legal.

The Safety Shares document should be completed within 7 days of the final report's approval.

6.7 CLOSE OUT

Once the investigation report has been approved and the Safety Share distributed, ownership of the event is shifted back to the BU VP for managing the corrective actions and preventing recurrence.

HSER **shall** record the investigation in IMD.

7 EXTERNAL NOTIFICATIONS & REPORTING

7.1 REGULATORY AGENCY REPORTING

Expand is required to report certain incidents to local, state, and federal regulatory agencies in accordance with permit requirements, established rules, and regulations. HSER is responsible for this reporting and determining whether additional guidance on reporting requirements (reporting thresholds, timeframes, and those designated to report to a regulatory agency) is needed.

Applicable agency reporting requirements, timeframes, and contact information are summarized in ***Appendix 11.5, External Reporting Notification Requirements.***

7.2 NOTICE OF VIOLATION PROCEDURE

HSER, working with all relevant stakeholders, **shall** provide guidance outlining the requirements and methods used to record and respond to Notices of Violation (NOVs) received from environmental, health and safety, or oil and gas regulatory agencies (EPA, OSHA, OCC, TRRC, ONRR, etc.). Refer to the HSER Notice of Violation Procedure.

8 MONITORING & TRENDING

Expand **shall** maintain data and systems to monitor and perform trend analysis of incidents and near misses, including process safety events. This data **shall** also be used to measure performance against industry standards and internal company goals and to evaluate the effectiveness of this Standard and the company's incident management initiatives. The required data points are outlined by incident type in IMD.

9 TRAINING

Training **shall** be developed and provided on the processes, procedures, requirements, and documents related to this Standard.

10 PROGRAM AUDITING

Audits will be conducted by the Compliance Assurance Team to gauge compliance with this Standard. These will focus on, but not be limited to:

- Content and implementation of associated topic-specific standards and procedures
- Incident documentation including IMD data fields and associated reports
- Corrective Action implementation and close-out

11 APPENDICES

11.1 SIF POTENTIAL INDICATORS

Use the following SIF Exposure Categories and associated questions as a guide to determine if an incident or near miss was, or had the potential to be, a Significant Incident or Fatality.

1. **Animal or Plant Contact:** Someone could be attacked, bitten, or stung by an animal or insect, or exposed to a toxic plant:
    - Was someone susceptible to anaphylactic shock (severe allergic reaction)?
    - Was the animal ferocious enough to cause life threatening injuries?
    - Was someone bitten by a venomous (poisonous) animal?

2. **Asphyxiation/Entrapment/Engulfment/Drowning:** Someone is working in a confined space or environment where a wall or ceiling can collapse, where material can flow over and engulf them, or they are working in or near water:
    - Was there an unauthorized entry into a confined space?
    - Was there a breakdown in the confined space procedure with people inside?
    - Did someone fall into water greater than 1 foot deep, with a swift or rip current, or with waves that caused visibility issues?
    - Was there an interruption in the breathing air supply?
    - Was someone engulfed by an avalanche of material?
    - Did a mine's ceiling, wall, or pit wall collapse?
3. **Caught between, by, or in:** A body part could be amputated, crushed, lacerated, or pinched due to being caught in mechanical equipment or between objects:

    ***NOTE –** If someone was caught by a motor vehicle, classify it as Struck by MV.*

    - Was there enough force to amputate or crush a body part?
    - Did someone reach into or get a body part caught in operating equipment?
4. **Extreme Atmospheric Temperature:** Someone is working in extremely cold or hot temperatures:
    - Was someone exposed to frostbite temperatures without adequate protection?
    - Were the heat and humidity sufficient to cause heat stroke?
    - Were there inadequate breaks, hydration, or shaded/warming areas to protect against extreme conditions?
5. **Falls, Slips, or Stumbles:** Someone could fall due to slipping, stumbling, tripping, stepping on an object or into a depression, or losing their balance; or they are working more than 4 feet above the surface:

    ***NOTE –** Use this category if the injury or potential injury is related to hitting an object while falling or hitting the ground.*

    - Did someone fall, or could have fallen, more than 4 feet?
    - Did someone fall backwards?
    - Did someone fall on a low-friction surface (e.g., ice or small plastic pellets)?
    - Did someone fall where SIF hazards are in the immediate fall zone?
6. **Fire or Explosion:** There was an unexpected or uncontrolled fire or explosion:
    - Were personnel unable to control the fire with a handheld fire extinguisher?
    - Was there significant fuel or unprotected explosive material nearby?
    - Was flammable liquid or gas leaking uncontrollably?
7. **Hazardous Substance Contact:** Biological, chemical or radiological hazards could be inhaled, ingested, or make skin contact; or extremely hot or cold material could contact someone:
    - Was the substance corrosive, toxic, or a health hazard, and was the exposure sufficient to cause a life-threatening injury?

- Did radiation exposure exceed, or could it have exceeded, the Personal Exposure Limit (PEL)?
- Was the biological agent life-threatening and uncontrolled?
- Was the material hot enough to cause 2nd or 3rd degree burns, or cold enough to cause frostbite or freeze skin?

8. **Motorized Equipment/Vehicle Operation:** Someone is operating or is a passenger in motorized equipment (ATV, boat, car, forklift, train, truck, etc.) and is at risk of injury:

   ***NOTE –** SIF potential is being evaluated for the driver and passenger.*

   - Was the personal restraint (seatbelt) not being used?
   - Was there a reasonable chance of rollover?
   - Was a critical control system (steering, brakes, air bag, or restraint system) lost or compromised?
   - Was the equipment being used beyond the manufacturer's rated capacity?
   - Was the equipment being operated in an unintended or unauthorized manner?
   - Did the airbags deploy?
   - Was there a crash where the striking vehicle or equipment was going more than 15 mph or exceeded twice the weight of the struck vehicle?
   - Was there a crash in an intersection?
   - Was the motor vehicle involved in a pull away incident?
   - Was there a derailment?
   - Did the operator fall asleep or operate the vehicle/equipment while impaired?

9. **Personal Assault:** Someone is involved in a verbal or physical altercation or attacked with a club, knife, gun, or other life-threating device:
   - Was someone physically assaulted?
   - Was someone threatened with a gun, knife, or other life-threatening device?

10. **Struck by – Falling or Moving Object:** Someone could be struck by a falling, rolling, flailing, or flying object, or a moving load:

    ***NOTE –** If gravity provides the energy, this category applies to falling and rolling objects.*

    - Did the falling object exceed 40 joules?
      [= mass in kilograms x height in meters x 9.8 (gravitational acceleration)]
    - Did the horizontally moving object exceed 40 joules?
      [= mass in kilograms x square of the velocity at impact in m/s]
    - Was the object's size, shape, and/or velocity likely to cause serious injury?

11. **(Pedestrian) Struck by – Motorized Equipment or Vehicle:** Someone can be contacted or struck by motorized equipment or a vehicle:
    - Did the vehicle/equipment make contact with, strike, or nearly strike someone?

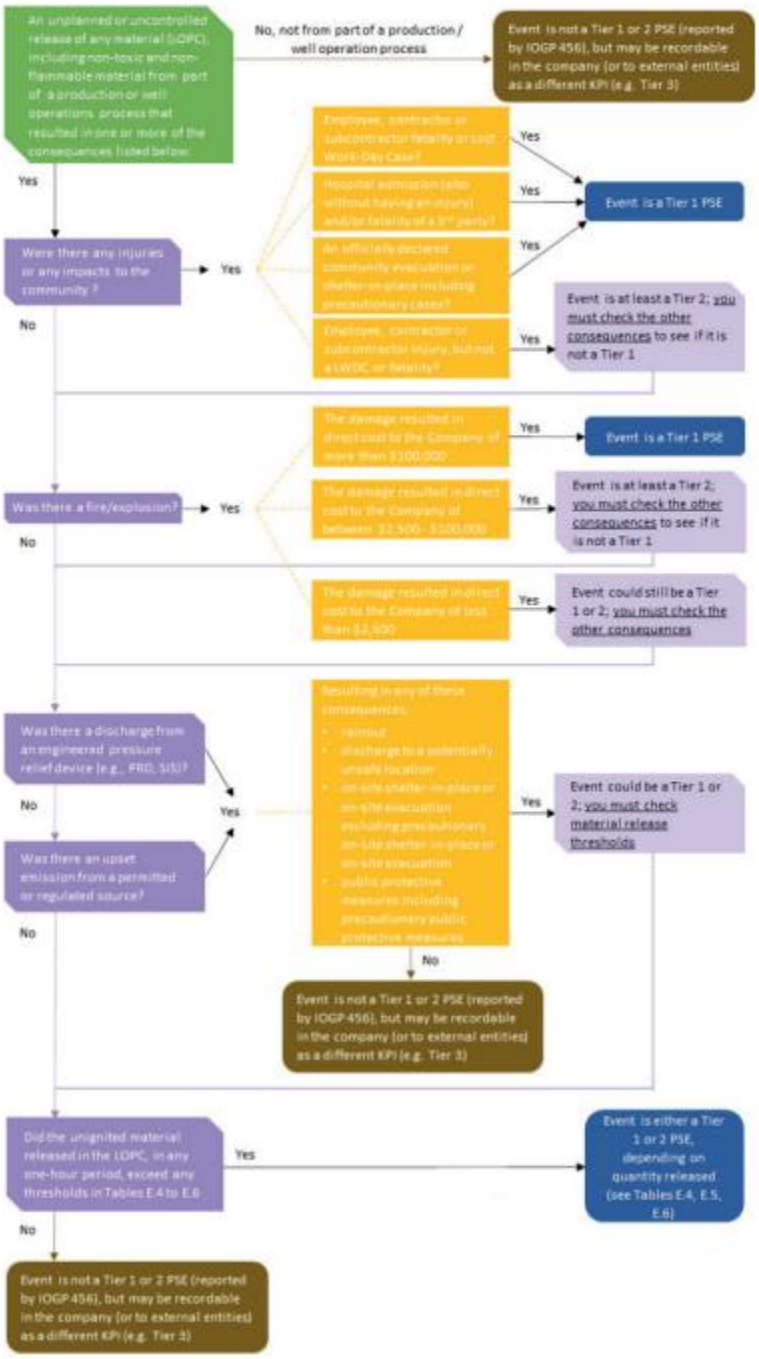
12. **Struck by or against – Personal Contact:** A moving person strikes an object; or a moving, non-powered object strikes them:
    - Did the object struck by or against have SIF potential?

13. **Struck by or Contact with – Release of Stored Energy:** An uncontrolled release of energy from an electrical source, gas or liquid under pressure, mechanical tension, or other stored energy:
    - Was the release unplanned and with a force that could cause serious injury?
    - Did the incident involve an electrical shock or arc flash?
14. **Struck by or Contact with – Power Equipment or Tools**: Someone contacts the operating part of power equipment or a tool:
    - Could the contact have resulted in a serious laceration, amputation, or other bodily injury capable of being life-threatening or altering?

11.2 GUIDE TO OSHA RECORDABLE INJURIES AND ILLNESSES

	Recordable (Medical Treatment)	Non-recordable (First Aid)
Visits to Health Care Professionals	• Any condition that is treated, or that should have been treated, with a treatment not on the first aid list	• Visits solely for observation, testing, or to evaluate diagnostic decisions • Visits solely for counseling • Diagnostic procedures, including prescribing or administering of prescription medications used solely for diagnostic purposes • Procedures defined in the final rule as first aid
Cuts, Lacerations, Punctures, and Abrasions	• Sutures (stitches) • Staples • Surgical glue • Treatment of infection with prescription meds on any visit • Application of prescription antiseptic or a non-prescription antiseptic at prescription strength • Surgical debridement (cutting away dead skin)	• Any wound coverings or bandaging by any medical personnel • Liquid bandage • Cleaning, flushing or soaking wounds on the surface of the skin; • Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™
Inoculations	• Inoculations such as gamma globulin, rabies, etc. given to treat a specific injury or illness, or in response to workplace exposure	• Tetanus immunizations • Immunizations and inoculations that are provided for public health or other purposes, where there is no work-related injury or illness
Splinters	• Foreign bodies which require more than simple means to remove because of their location, depth of penetration, size, or shape	• Removing foreign bodies from the eye using only irrigation or a cotton swab; • Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means (needles, pins or small tools)
Strains, Sprains, and Dislocations	• Casts or immobilization with rigid stays • Chiropractic manipulation • Exercises recommended by a health care professional who trains the worker in the proper frequency, duration and intensity of the exercise • Physical therapy	• Hot or cold therapy • Any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. • Finger guards • Temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
Burns, Skin Rashes, and Blisters	• Draining of bruises by needle	• Soaking therapy • Hot or cold therapy
Medications	• Prescription medication, whether given once or over a longer period of time • Prescription medication, whether that prescription is filled or taken or not • Non-prescription medication administered or prescribed at prescription strength	• Non-prescription medicines at non-prescription strength, whether in ointment, cream, pill, liquid, spray, or any other form
Oxygen	• **Oxygen administered to an employee exposed to a substance who exhibits symptoms of an injury or illness**	• **Oxygen administered purely as a precautionary measure to an employee who does not exhibit any symptoms of an injury or illness**
Physical Therapy	• **Exercises recommended by a health care professional who trains the worker in the proper frequency, duration and intensity of the exercise** • **Physical therapy**	
Loss of Consciousness	• **Loss of consciousness which results from a workplace event or exposure (e.g., chemicals, heat, an oxygen deficient environment, a blow to the head)** •	• **Loss of consciousness due solely to epilepsy, diabetes, narcolepsy, or other personal health condition** • **Due to voluntary participation in a wellness or similar program (e.g., company sponsored blood donation)** •

11.3 DETERMINING A TIER 1 & 2 PROCESS SAFETY EVENT (IOGP REPORT 456)



11.4 INCIDENT MANAGEMENT DATABASE (IMD) TERMS AND DESCRIPTIONS

Incident Type	Hover/Help Text
Injury	Any physical damage to the body caused by an incident involving anyone (including contractors, vendors or members of the public) on company premises, operating company equipment, or in the course of company business.
Occupational Illness	Any abnormal condition or disorder caused by exposure to environmental factors.
Environmental / Atmospheric Release	An unplanned or uncontrolled release of any material from primary containment. The loss of primary containment is classified as an environmental/atmospheric release irrespective of whether the material is released into secondary containment.
Fire/Flammable Atmosphere	A destructive, uncontrolled or unplanned burning of any material that is a solid, liquid or gas, where destruction of property or human injury could potentially result or a mixture of dangerous substance with air, under atmospheric conditions, in the form of gases, vapors, mist or dust in which combustion may occur.
Pressure Event	The increase of contained pressure sufficient to a) initiate an automated system shutdown, or b) forcibly escape primary containment.
Well Control Event	Continuous, unintended, uncontrolled flow of drilling fluid, oil, gas and/or water from a well, above or below the surface of the earth and/or water bottom or when it is declared to be out of control by the appropriate regulatory authority.
Property Damage	Significant damage (greater than $1000) to equipment, materials, structures, chemicals and/or other company property, any damage occurring to a company-owned, leased, rented or otherwise secured vehicle while the vehicle is legally parked or superficial damage occurring while the vehicle is being driven (rock chip damaging the windscreen or paintwork) .
Equipment Failure	An event that reveals the inability of equipment component/s to continue functioning as designed.
Motor Vehicle Accident	An incident in which a company-owned, leased, rented or otherwise secured vehicle is involved at any time or personal vehicle is involved on company business (trip is business related as determined by IRS) regardless of whether it is in motion or temporarily stopped (traffic control device, etc.) which results in injury or any type of property damage.
Water Source Complaint	Complaint in which the company is apprised in a formal or official manner related to the quality or quantity of the groundwater from which a landowner uses for agricultural and/or human consumption.
Security/Theft	A criminal intent or perceived intent to commit a breach in access controls that result in, or could have resulted in the unauthorized physical or electronic entry on/in to company premises or electronic databases, the commission or attempted commission of a crime against persons/property on or with company controlled property, including but not limited to the theft or attempted theft of company property off premises.
Agency Inspection	The inspection of a company operation or site by a governmental regulatory agency to document compliance.
Notice of Violation	All notices, letters, orders, citations, or official complaints indicating alleged non-compliance with permits, rules or laws issued from local, municipal, county, state, interstate, or federal agencies.
Wildlife Incident	Discovery or interactions with wildlife on company premises, operating company equipment, or in the course of company business resulting in wildlife injury or death. Does include livestock or domestic animals.

11.5 External Reporting Notification Requirements

All notifications to the Federal OSHA and Chemical Safety and Hazard Investigation Board (CSB) **shall** be coordinated with Operations, Legal and HSER prior to any notifications being made.

<table>
<tr><th colspan="3">Federal Occupational Safety and Health Administration (OSHA)</th></tr>
<tr><th>What to Report</th><th>When to Report</th><th>How to Report</th></tr>
<tr><td>• Work-related employee fatality</td><td>Within 8 hours</td><td rowspan="2">• Call the nearest OSHA Office
• Call the OSHA 24-hour hotline 1-800-321-6742
• Report using the Online Form</td></tr>
<tr><td>• Work-related in-patient hospitalization
• Work-related amputation
• Work-related loss of an eye</td><td>Within 24 hours</td></tr>
<tr><th colspan="3">Chemical Safety and Hazard Investigation Board (CSB)</th></tr>
<tr><td colspan="3">If a regulated or extremely hazardous substance is released to ambient air at a stationary source and results in a fatality, a serious injury that results in death or inpatient hospitalization, or significant property damage (≥$1,000,000), the following information must be reported to the CSB (do NOT report if the release does not satisfy all of the reporting criteria):

If the owner/operator has submitted a report to the National Response Center (NRC) pursuant to 40 CFR §302.6, NRC will assign a Report Number (SEQNOS). CSB allows the owner/operator to report the SEQNOS number to CSB within 30 minutes of the NRC notification without filing a second report. CSB can access the information reported to the NRC using the SEQNOS.</td></tr>
<tr><th>What to Report</th><th>When to Report</th><th>How to Report</th></tr>
<tr><td>• Owner or operator name and contact information
• Name and contact information for person making the report
• Location information and any facility identifiers (EPA Registry Identification)
• Approximate time of the accidental release
• A brief description of the accidental release
• An indication whether a fire, explosion, death, serious injury, or property damage has occurred</td><td>Within 8 hours of the accidental release</td><td>• Submit by email at report@csb.gov or by telephone at 202-261-7600
• A revised notification may be submitted within 30 days of the initial notification to the CSB at report@csb.gov or by correspondence to:

Chemical Safety Board
1750 Pennsylvania Av. NW
Suite 910
Washington, DC 20006</td></tr>
</table>

• Name(s) and Chemical Abstract Service (CAS) number(s) of the material(s) involved in the accidental release • Amount of the release (if known) • Number of fatalities (if known) • Number of serious injuries (if known); • Estimated property damage at or outside the stationary source; and • Whether the release resulted in an evacuation order impacting members of the general public or the facility, including the number of persons evacuated (if known), the approximate radius of the evacuation zone, and type of person(s) subject to the evacuation order (i.e., employees, members of the general public, or both).		
Bureau of Land Management (BLM) – United States		
What to Report	**When to Report**	**How to Report**
<u>Major undesirable events</u> • Oil, saltwater, or toxic liquid spills, or any combination thereof, resulting in a discharge (spill) of 100 or more barrels of liquid. If, however, the discharge is entirely contained within the facility's firewall, it need only be reported in writing. • Equipment failures or other incidents which result in venting 500 MCF or more of gas • Any fire which consumes 100 or more barrels of oil, saltwater, toxic liquid, or gas • Any spill, venting, or fire, regardless of the volume, occurring in a sensitive area such as parks, recreation sites, wildlife refuges, lakes, reservoirs, streams, urban or suburban areas • Any incident which involves a fatal injury • A blowout (any loss of well control)	• Initial notice within 24 hours • Follow-up written report within 15 days	• Call to the appropriate District Engineer • Follow-up written report to the District Engineer

Other than major undesirable events • Oil, saltwater, or toxic liquid spills, or any combination thereof, resulting in a discharge (spill) of at least 10 but less than 100 barrels of liquid in non-sensitive areas, and discharges of 100 or more barrels when the spill is entirely contained within the facility's firewall • Equipment failures or other incidents which result in the venting of at least 50 but less than 500 MCF of gas in non-sensitive areas • Any fire which consumes at least 10 but less than 100 barrels of oil, saltwater, toxic liquid, or gas • Each incident involving a major or life-threatening injury • Discharges in non-sensitive areas of less than 10 barrels of liquid or 50 MCF of gas do not require an immediate report, however, these volumes must be reported in the Monthly Report of Operations / Monthly Report of Sales and Royalty	Within 15 days	• Written report submitted to the appropriate District Engineer
U.S. Department of Transportation (DOT) **Transportation of Natural and Other Gas by Pipeline (Part 192)**		
Refer to the appropriate CLR O&M Manual for detailed reporting requirements on regulated natural gas pipelines.		
What to Report	**When to Report**	**How to Report**

• Following confirmed discovery, operator must give notice of any of the following:
  ○ Event involving a release of gas from a pipeline subject to Part 192 that results in one or more of the following:
  ▪ Death or personal injury requiring in-patient hospitalization
  ▪ Estimated property damage of $122,000 or more
  ▪ Unintentional gas loss of 3 million cubic feet or more
	Within 1 hour	• Call the NRC at 800-424-8802

○ Event that is significant in the judgement of the operator, even though it did not meet the criteria listed above		
• Revise or confirm initial telephonic notice for events listed in the first row of this table	Within 48 hours	• Call the NRC at 800-424-8802
• Operator of regulated onshore gathering pipeline (Type A, B, and C) must submit incident report for events listed in the first row of this table	Within 30 days	• Electronically on PHMSA Portal on DOT Form PHMSA 7100.2
• Operator of reporting regulated gathering pipeline (Type R) must submit incident report for events listed in the first row of this table	Within 30 days	• Electronically on PHMSA Portal on DOT Form PHMSA 7100.2-2
• Safety-related condition (excluding any accident above which is required to be reported) of Type A, B, or C (only greater than 12.75” for Type C) and that is less than 220 yards from any building intended for human occupancy or outdoor place of assembly and that has not been corrected by repair or replacement before the deadline for filing safety-related condition report involving any of the following: ○ For pipelines that operate at a hoop stress of 20% or more SMYS, general corrosion that has reduced the wall thickness to less than that required for the maximum allowable operating pressure, and localized corrosion pitting to a degree where leakage might result ○ Unintended movement or abnormal loading of a pipeline by environmental causes (earthquake, etc.) ○ Any material defect or physical damage that impairs the serviceability	Within 5 working days after operator first determines condition exists, but not later than 10 working days after operator discovers condition	• Email to DOT (see 191.25 for requirements) • Applicable State agency

of a pipeline that operates at a hoop stress of 20% or more SMYS ○ Any malfunction or operating error that causes the pressure to exceed the MAOP ○ A leak in a pipeline that constitutes an emergency ○ Any safety-related condition that could lead to an imminent hazard and causes a 20 percent or more reduction in operating pressure or shutdown of operation of a pipeline		

U.S. Department of Transportation (DOT) **Transportation of Hazardous Liquids (Part 195)**		
Refer to the appropriate O&M Manual for detailed reporting requirements on regulated hazardous liquids pipelines.		
What to Report	**When to Report**	**How to Report**
• Following confirmed discovery of a release of hazardous liquid or carbon dioxide, operator must give notice of any failure in a pipeline system subject to Part 195 resulting in any of the following: ○ A death or a personal injury requiring hospitalization ○ Either a fire or explosion not intentionally set by the operator ○ Estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding $50,000 ○ Pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines	Within 1 hour	• Call the NRC at 800-424-8802

○ In the judgment of the operator was significant even though it did not meet the criteria listed above		
• Revise or confirm initial telephonic notice for events listed in the first row of this table	Within 48 hours	• Call the NRC at 800-424-8802
• Failure in a pipeline system subject to Part 195 where there is a release of hazardous liquid or carbon dioxide resulting in any of the following: ○ Explosion or fire not intentionally set by operator ○ Release of more than 5 gallons (19 liters) or more of hazardous liquid or carbon dioxide ○ Death of any person ○ Personal injury requiring hospitalization ○ Estimated property damage, including cost of clean-up and recovery, value of lost product and damage to the property of the operators or others, or both, exceeding $50,000	Within 30 days	• File an accident report on DOT Form 7000-1
• Safety-related condition (excluding the incidents listed above which are required to be reported) less than 220 yards from any building intended for human occupancy or outdoor place of assembly that has not been corrected before the deadline for filing safety-related condition report involving any of the following: ○ General corrosion that has reduced the wall thickness to less than that required for the maximum operating pressure, and localized corrosion pitting to a degree where leakage might result ○ Unintended movement or abnormal loading of a pipeline by environmental causes (earthquake, etc.)	Within 5 working days after operator first determines condition exists, but not later than 10 working days after operator discovers condition	• Email to DOT (see Part 195.56 for requirements) • Applicable State agency

○ Any material defect or physical damage that impairs the serviceability of a pipeline ○ Any malfunction or operating error that causes the pressure of a pipeline to rise above 110% of its maximum operating pressure ○ A leak in a pipeline that constitutes an emergency ○ Any safety-related condition that could lead to an imminent hazard and cause a 20%+ reduction in operating pressure or shutdown of a pipeline		
U.S. Federal Aviation Administration (FAA)		
What to Report	**When to Report**	**How to Report**
• If an emergency has the possibility of affecting aviation traffic, local law enforcement agencies have the authority to notify the FAA and request a temporary flight restriction for the area	As soon as possible	• Call 866-835-5322
U.S. National Response Center (NRC)		
What to Report	**When to Report**	**How to Report**
• A release of oil or a hazardous substance to navigable waters • A release of a hazardous substance to air in excess of the reportable quantity listed in 40 CFR §302.4 Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) hazardous substances are identified and regulated under 40 CFR Part 302	Immediate notification	• Call the NRC at (800) 424-8802 or (202) 267-2675

11.6 INCIDENT AND NEAR MISS TITLE STRUCTURE GUIDANCE

INCIDENT TITLE WOULD BE CODED TO REFLECT THE FOLLOWING:

CORPORATE/BU – PAD/SITE NAME – INCIDENT OR NEAR MISS – INCIDENT TYPE – DATE OF INCIDENT – EMPLOYEE/CONTRACTOR

CORPORATE/BUSINESS UNIT

WE LIST EACH COMPANY AND HAVE ABBREVIATIONS FOR EACH ONE:

CORP = Corporate
NEAPP = Northeast Appalachia
SWAPP = Southwest Appalachia
COMP = Completions
DRLG = Drilling
HAY = Haynesville

INCIDENT OR NEAR MISS

Incident = IN
Near Miss = NM

INCIDENT TYPE

Agency Inspection = Insp
Atmospheric Release = Atm Rel
Environmental Release = Env Rel
Equipment Failure = Equip
Fire/Flammable Atmosphere = Fire
First Aid = FA
Injury = Inj
Motor Vehicle Accident = MVA
Wildlife = Wldlf
Multiple = Mult
Notice of Violation = NOV
Occupational Illness = Ill
Pressure Event = PSI
Property Damage = Prop Dmg
Security/Theft = Sec
Water Source Complaint = H2O Comp
Well Control Event = Well Ctrl

DATE OF INCIDENT

YYYY / MM / DD

EMPLOYEE OR CONTRACTOR

Employee
Contractor

11.7 Operational Control and Event Reporting Matrix

This matrix provides guidance and identifies contractor activities that fall within Operational Control for internal incident reporting and classification.

Contractor HSE Risk Tier	Contractor Scope of Work (SOW)	Example Activities	Operational Control	Incident Management Database (IMD) Recordability	Program Requirements
1	Services performed on a company wellsite, right-of-way or field project site	Drilling, Completions, Downhole and Openhole Well Work, Excavation and Heavy Equipment Operations, and Hydrostatic Testing	Yes	Yes	Insurance ISNetworld Connection Case Management SafeLand, SafeGulf Industry Orientation EXE Annual Orientation (Video)
2	Services performed on a company wellsite, right-of-way or field project site. Transportation and delivery of company owned goods and products that involves (on/off loading)	Surveying, Civil Work and Surface Services, Construction, Maintenance, Roustabout Services, Instrument & Electrical, Compression Services and Water Haulers	Yes	Yes	Insurance ISNetworld Connection Case Management SafeLand, SafeGulf Industry Orientation EXE Annual Orientation (Video)
3	3rd party Support Services, Transportation / delivery of non-company owned goods and products	Rental equipment delivery services (forklift, man-lifts, light plants, generators, porta-pots, living quarters), 3rd party equipment repair and maintenance, Utility providers, Fuel Delivery, and Line Locate Services	No	"For Record Only" classification	Insurance ISNetworld Connection Case Management SafeLand, SafeGulf Industry Orientation EXE Annual Orientation (Video)
4	Facility Management Services performed at a company Office Building, Warehouse, Restaurant, Wellness Center or Child Care Facility. Supplies and material delivery.	Janatorial, Lawncare, Pest Control, Window Cleaning, HVAC and Chiller Services, Pumping, Electrical, Fire Suppression System and Overhead Hoist Inspection & Maintenance, Catering, Restaurant Support, Cooks, Grease Removal, Supply and Material Delivery Services, Fitness Instructors, and Personal Trainers	No	"For Record Only" classification	Insurance * ISNetworld and Case Management not required unless requested for a large project.

* Contractor vehicle incidents and associated contractor injuries will be recorded as "For Record Only" events in IMD if they occur off pad. (Applies to Tiers 1- 4)

* Expand's fluids spilled as the result of a contractor MVA **shall** be recorded in the IMD as a spill to track agency reporting and cleanup.

12 DOCUMENT CONTROL TABLE

Title: Incident Reporting and Management Standard			**Document Number:** HSER-SAF-EXE-STD-005	
Next Review Date: 01/01/28				
Originating Department: Health, Safety, Environment, and Regulatory				
Version History				
Ver. #	**Issue Date**	**Description**	**Author(s)**	**Approved By**
1.0	1/1/25	Previously HSER-CHK-STD-005 Incident and Near Miss Management Standard Original Document	Harris Marcom, Katie Rhoads	Operations Governance Board