1. PURPOSE

The purpose of this standard is to describe the minimum requirements and responsibilities for compliance with Spill Prevention Control and Countermeasures (SPCC) regulations.

2. SCOPE

This Standard is applicable to company owned or operated facilities that have an aggregate oil storage capacity of 1320 gallons or greater, in containers 55 gallons and larger, and for which there is a reasonable expectation that a discharge of oil could reach the navigable waters of the United States or adjoining shorelines in quantities that may be harmful.

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

3. DEFINITIONS

Deficiencies – conditions at facilities not meeting requirements outlined within the SPCC Regulation, SPCC Plan and/or SPCC Standard.

Facility – means any mobile or fixed, onshore or offshore building, property, parcel, lease, structure, installation, equipment, pipe, or pipeline (other than a vessel or a public vessel) used in oil well drilling operations, oil production, oil refining, oil storage, oil gathering, oil processing, oil transfer, oil distribution, and oil waste treatment, or in which oil is used. The boundaries of a facility depend on several site-specific factors, including but not limited to, the ownership or operation of buildings, structures, and equipment on the same site and types of activity at the site. Contiguous or noncontiguous buildings, properties, parcels, leases, structures, installations, pipes, or pipelines under the ownership or operation of the same person may be considered separate facilities. Only this definition governs whether a facility is subject to this part.

Oil – any liquid oil, whether animal, vegetable or mineral, fresh or used/waste. Oil for purposes of SPCC includes crude oil, refined oil (engine, hydraulic, etc.), condensate, fuels, petroleum-based chemicals and water contaminated with oil sufficient to cause a sheen.

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.

SPCC Contractor – contractor hired by EXE to conduct site inspections, prepare and certify SPCC Plans.

SPCC Inspector – contractor or employee who has experience and/or received instruction in conducting and documenting thorough SPCC site inspections.

4. ROLES & RESPONSIBILITIES

4.1. OPERATIONS

- Operations management **shall** approve and commit the necessary resources to fully implement the SPCC Plan for each applicable location.
- Set up and maintain facility information within the company business system of record to include inventory records of SPCC applicable tanks and equipment.
- Correct SPCC site deficiencies identified during periodic site inspections.
- Attend required SPCC training and briefings.

4.2. HSER

- Monitor business assets to ensure all applicable sites attain and maintain compliance with SPCC requirements, including state specific requirements that may impact or overlap with SPCC.
- Advise Operations in maintaining SPCC compliance and correcting deficiencies.
- Oversee SPCC contractor(s) and coordinate assigned SPCC work with all stakeholders.
- Review new or updated SPCC Plans for accuracy.
- Periodically review and update emergency response contacts and person(s) accountable for discharge prevention in the BU.
- At least annually and whenever service companies change, review and update typical oil capacity of mobile facilities in the SPCC Plan appendix.
- Determine interval for periodic documented inspections for the BU.
- Designate SPCC Inspectors.
- Track and report spills above threshold to governmental agencies.
- Develop SPCC training materials.

5. REQUIREMENTS

5.1 SPCC PLAN

Each facility subject to SPCC regulations **shall** have compliant SPCC Plan (“Plan”) within 6 months of becoming subject to the rule. The Plan **shall** conform to the applicable SPCC requirements for the type of facility. For example, oil and gas production sites **shall** comply with 40 CFR 112.9 requirements (including cross referenced regulations), whereas ancillary facilities such as manufacturing plants must comply with 40 CFR 112.8.

Business Units (BU) have the option to implement standalone plans for regulated sites or manage applicable facilities under a two-part plan:

- Part A contains regional information that is associated with all sites within the region and references a list of all facilities applicable to the plan. It is good practice to list within the Part A any facilities covered under a different Plan — for example, any facilities that do not meet the substantial harm criteria.
- Part B for each facility contains SPCC details specific to that facility, such as the list of bulk storage tanks and a facility diagram.

5.2 SPCC Plan Amendments

SPCC Plans contain information for effective spill response and must be kept up to date. For this reason, the Plan is regularly updated under the following circumstances:

- Management review at least every 5 years
- Administrative updates to Part A, as needed
- Technical amendments to each Part B, as needed
- Administrative amendments to each Part B, as needed

5.2.1 Management Review

Operations management **shall** review and evaluate the entire Plan for its adequacy at least once every five (5) years. The scope of the review is to evaluate existing practices for spill prevention and control against state-of-the-art technology. The review **shall** be documented by completing the Log of Five-Year Plan Review and Amendment in Part A.

5.2.2 Administrative Updates to Part A

Examples of administrative updates to Part A are personnel or spill response contractor changes, minor text edits and management certifications.

5.2.3 Technical amendments to each Facility's Part B

Oil and gas production facilities may undergo changes over time that make the facility-specific portion of the plan (Part B) less accurate. Technical amendments to Part B of the Plan **shall** be made as necessary, and require recertification by a state registered Professional Engineer within six (6) months of the change. Examples of changes triggering a technical amendment include:

- Addition of storage tanks or pressure vessels or increasing size of storage tank
- Reconstruction or installation of piping systems
- Construction, alteration, or demolition of secondary containment

5.2.4 Administrative Amendments to Part B

Facility changes that do not materially affect storage capacity and/or the potential for an oil spill or release at the facility will be made without engineer recertification, as soon as possible but no later than six (6) months from the change. Examples of administrative changes include:

• Like/Kind replacement or removal of tanks or production chemicals

• Like/Kind replacement of piping systems

5.3 SPCC Inspections and Tests

5.3.1 Routine Inspection (Visual Only)

Routine visual inspections are typically performed by the lease operator. Such inspections of storage tanks and storage areas include:

- Signs of oil discharges, evident by drip marks, discoloration of tanks, puddles containing spilled or released oil
- Excessive accumulation of water within secondary containment
- Visual operating conditions of aboveground valves and piping
- Buried pipe is visually inspected for signs of corrosion whenever exposed

5.3.2 SPCC Inspection (Visual plus Documentation)

No less than once every five years, a comprehensive inspection of each facility **shall** be performed and documented by an SPCC Inspector. Such inspections generally include:

- Signs of oil discharges evident by drip marks, discoloration of tanks, puddles containing spilled or released oil.
- Excessive accumulation of water within secondary containment.
- Signs of secondary containment deterioration.
- Evidence of tank cracks, shell distortions, and corrosion.
- Signs of tank foundation settling and deterioration.
- General conditions of oil transfer equipment, including aboveground oil pipes, valves, appurtenances, and transfer hoses, where applicable.
- Adequate inventory of discharge response equipment (i.e., spill absorbents).

5.3.3 Mechanical Integrity Program

Bulk storage tanks, pressure vessels, piping and valves **shall** be included in an inspection program and periodically evaluated and/or tested for leaks, corrosion, or other deteriorating

conditions. Documented inspections **shall** be performed by qualified inspectors in accordance with good engineering practice.

5.4 SECONDARY CONTAINMENT

Secondary containment volume at facilities subject to SPCC requirements **shall** be a minimum of 110% of single largest AST within containment, or 100% of same plus 24hr/25-year rainfall, or as otherwise specified in state regulations. All oil storage containers 55 gallons and larger **shall** be in secondary containment.

5.5 SPCC COMPLIANCE FOR MOBILE FACILITIES, INCLUDING DRILLING, COMPLETIONS AND WORKOVERS

Mobile facilities, such as drilling, workover and completions **shall** comply with SPCC regulations 40 CFR 112.10 for mobile facilities and their SPCC Plans should be accessible and adhered to during the job.

In the event a contractor has not developed a written SPCC Plan, EXE **shall** ensure compliance with SPCC regulations as follows:

- If the facility on which the mobile facility is operating has a Plan in place (for example, an SPCC applicable production site with a certified Plan) then the mobile facility is covered under the existing Plan.
- If the facility on which the mobile facility is operating does not have a Plan in place (for example, a new pad site being developed, or a non-SPCC applicable production site), then the Regional SPCC Plan Part A **shall** include/address the region's mobile facility compliance procedure. This requirement can be satisfied by documenting SPCC applicable oil containing products and volumes typical for service company mobile facilities used by the BU. The list of SPCC regulated oil capacity should be updated periodically and included as an attachment to the Regional Plan Part A.

5.6 SPCC REPORTING REQUIREMENTS

All incidents, including spills, are reported as outlined in the Company's Incident Reporting and Management Standard. Oil discharges are documented, and when required **shall** be reported to the required governmental agencies, including, but not limited to, the National Response Center.

Whenever a facility has discharged more than 1,000 U.S. gallons of oil in a single discharge, or two discharges each exceeding 42 U.S. gallons of oil into an aquatic resource within any twelve-month period, a HSER representative **shall** submit information to the EPA Regional Administrator within 60 days from discharge that made the facility subject to reporting.

5.7 DOCUMENT STORAGE

Documented SPCC inspections, discharge record and other operational test records **shall** be kept for no less than three years. SPCC Plans should be kept for at least three years after the facility is no longer subject to SPCC.

Facility Plans and documented inspections are stored under the pad number in the Environmental/SPCC folder in the Document Center. If a facility is manned four hours per day or more, the Plan **shall** be maintained at the facility.

6. TRAINING

Training **shall** be administered initially to all oil-handling personnel to ensure adequate understanding of SPCC requirements. The SPCC training describes:

- SPCC applicability and compliance requirements
- Plan contents and location
- Operation and maintenance of spill prevention and response equipment
- Spill and emergency response procedures, including notification

SPCC inspectors are given additional instruction in the company's SPCC inspection and documentation procedures.

6.1 SPCC BRIEFING

Discharge prevention briefings for oil-handling personnel **shall** occur no less than once per year. SPCC compliant briefings include detailed descriptions and lessons learned from spills or near misses from any facility. Topics for discussion include activities, conditions and equipment involved in spill events, as well as prevention and mitigation measures deployed. Whereas the regulatory requirement is for annual briefings, best practice is much more frequent (for example, weekly) knowledge sharing of spill root cause analyses, in order to keep spill prevention top of mind.

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 Operations Manager. The Company's Standard Exception Form is to be utilized to properly document any exceptions.

9. REFERENCES

- 40 CFR 112 Oil Pollution Prevention
- SPCC Guidance for Regional Inspectors, EPA 550-B-13-002, November 15, 2013

10. DOCUMENT CONTROL TABLE

Title: SPILL PREVENTION CONTROL & COUNTERMEASURES (SPCC) STANDARD			**Document Number:** HSER-ENV-EXE-STD-004	
Next Review Date: 6/30/2028				
Originating Department: HSER				
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Version	**Issue Date**	**Description**	**Author(s)**	**Approved By**
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