

**SANDRIDGE EXPLORATION & PRODUCTION LLC (#10598)  
COMPLIANCE PROGRAM**

**7/26/2019**

**revised 7-31-2019**

Item	Description	Notes	Due Date Initial	Other Reporting
<b>Compliance Report</b>				
	<b>Report on status of corrective actions</b>	<i>See SandRidge CA Spread Sheet</i>	<b>8/12/2019</b>	Ongoing: per FIRR SOP
<b>Regulatory</b>				
	<b>Audit all In Process Form</b>			
	Submit replacement forms for those with attachment/log issues.		<b>9/23/2019</b>	
	Submit spreadsheet for forms that only require data field corrections.		<b>9/23/2019</b>	
	<b>Conductor Setting Policy</b>			
	Audit and bring conductors into compliance with Conductor Setting Policy.		<b>8/26/2019</b>	
	Provide report on conductor compliance.		<b>10/1/2019</b>	
	Provide Financial Assurance as required under CSP.			
<b>Stormwater Management</b>				
	<b>Develop Site Specific Stormwater Plans</b>	<i>Improve compliance with COGCC Stormwater Rules</i>	<b>9/9/2019</b>	start immediately
	Completed by Qualified Individual.			
	Use good engineering practices during design and installation of site specific stormwater BMPs (1002 f.(2).			
	Identify all pollutant sources and provide BMP.			
	<b>Implementation of Plans</b>		<b>immediate as developed</b>	
	<b>Staff training</b>		<b>8/23/2019</b>	Ongoing
	<b>Contractor oversight by QI</b>		<b>Immediate</b>	Ongoing
	<b>Vehicle Tracking Control Level 2+</b>	<i>Street sweepers are not a primary BMP</i>	<b>Immediate</b>	Ongoing

Surface Disturbance Minimization Plan				
	<b>Prepare, submit and implement plans to reduce pad size</b>	<i>Include areas used for storing equipment and materials that were not permitted</i>	<b>9/9/2019</b>	<i>Currently SandRidge is disturbing lands not permitted for oil and gas. Consider county permit for storage yard(s). Test soil/debris piles per direction from Environmental group Locations with potential future operations must have additional financial assurances identified</i>
	<b>Soil and debris piles</b>	Remove piles	<b>10/1/2019</b>	
	<b>Interim Reclamation</b>	Immediately begin interim reclamation at all locations (3 months 6 months after rig demob)	<b>Immediate</b>	
Topsoil Plan				
	<b>Provide individual topsoil plans and analysis for each location</b>		<b>8/26/2019</b>	
	Include map that identifies all topsoil and current condition of stockpiles relative to COGCC Rules Include analysis of topsoil that should have been salvaged according to COGCC Rules			
Winter Operations Plan				
	<b>Develop and submit Winter Operations Plan</b>		<b>9/23/2019</b>	
	Snow management Spill response Equipment maintenance <i>Consider winter shut down</i> Cold weather operations			
Facility Engineering				
	<b>Facility Engineer</b>		<b>9/1/2019</b>	
	Modify Site Layouts Implement designs that allow for reclamation and reduces disturbance of surface. Further site permits or modification may require or be candidate for Alternative Site Analysis			

<b>Construction Supervisor/Manager</b>				
	<b>Construction Manager/Supervisor Oversight of all work</b>		<b>Immediate</b>	
		<i>Surface owner can be contractor but must meet all requirements under COGCC rule.</i>		
	<b>Review construction practices</b>			
	<i>Build smaller locations that are designed to handle winter conditions and high intensity rain events.</i>		<b>8/26/2019</b>	
	<i>Consider</i>			
	<i>soil stabilization</i>			
	<i>chipped asphalt</i>			
	<i>compaction</i>			
	<i>geotextiles</i>			
	<i>Removal of snow cannot include movement of surface materials</i>			
	<i>All stockpiles of any kind require stormwater control.</i>			
<b>Field Development</b>				
	<b>Provide report that describes plans to develop field</b>	<i>Schedule meeting to discuss.</i>	<b>8/16/2019</b>	<b>Quarterly</b>
	New wells			
	Re-permitting			
	Pipelines			
	Gas Plant			
<b>Waste Management Plan</b>			per environmental work unit	
<b>Unused FRAC sand</b>				
	Identify all locations where frac sand was dumped on location, remove, dispose of at landfill.	hazardous substance that will be handled per MSDS.	<b>8/19/2019</b>	
	Provide manifest			
	Good housekeeping			
	Update on spill release detection and prevention			
	Remediation and cleanup of spills			
	Chemicals storage			
	Used Oil and Oily Waste			

Containment structures and liners  
 Removal fluids from containment  
 Maintain records of fluid removal

**Mechanical Condition**

**Integrity Management**

Provide Integrity Management Program

Inspections, testing,  
 maintenance and  
 movement of  
 equipment

**TBD**

**Contractor training program**

**Remove gravel from cellar around TA Wells at Marr.**

Contact engineering  
 concerning well integrity

**TBD**

**9/16/2019**

**Contractor Oversight**

**Company man on location under active operations**

**Immediate**

**Safety**

**Contractors should have safety programs.**

Contractors should provide JSA.

**Immediate**