

**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.			
	Provide report on conductor compliance.		<b>8/26/2019</b>	
	Provide Financial Assurance as required under CSP.		<b>10/1/2019</b>	
<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	

**Construction Manager/Supervisor**  
**Oversight of all work**

*Surface owner can be contractor but must meet all requirements under COGCC rule.*

**Immediate**

## Review construction practices

*Build smaller locations that are designed to handle winter conditions and high intensity rain events.*

Consider

*soil stabilization*

*chipped asphalt*

*compaction*

*geotextiles*

*Removal of snow cannot include movement of surface materials*

*All stockpiles of any kind require stormwater control.*

**8/26/2019**

**Provide report that describes plans to develop field**

*Schedule meeting to discuss.*

**8/16/2019**

### Quarterly

## New wells

Re-permitting

## Pipelines

## Gas Plant

per environmental work  
unit

Identify all locations where frac sand was dumped on location, remove, dispose of at landfill.

Hazardous substance  
that will be handled per  
MSDS.

**8/19/2019**

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**

<b>Integrity Management</b>		
Provide Integrity Management Program	Inspections, testing, maintenance and movement of equipment	TBD
<b>Contractor training program</b>		TBD
<b>Remove gravel from cellar around TA Wells at Marr.</b>	Contact engineering concerning well integrity	9/16/2019

**Contractor Oversight**

<b>Company man on location under active operations</b>	<b>Immediate</b>
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**Safety**

<b>Contractors should have safety programs.</b>	<b>Immediate</b>
Contractors should provide JSA.	