



Site Safety and Emergency Action Plan

Nickel Road Operating LLC – Denver Office

600 17th Street, Suite 610 S

Denver, CO 80202

DeHaan South Well Pad & DeHaan South Facility Pad

Township 7 North, Range 65 West

19209 WCR 80

SWSW of Section 17

Weld County, Colorado

Proposed Spud Date: Q1 of 2019

The Following Site Safety Plan Approved By:

Fire Protection District

By: _____

Date: _____

Fire District: Ault-Pierce Fire Department

Title: _____

Weld County Office of Emergency Management

Digitally Signed



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Section 1 – Site Specific Information

a) Site Safety Requirements

The minimum personal protective equipment (PPE) to enter any Nickel Road Operating LLC production location includes hard hat, safety glasses, safety toe boots, fire resistant clothing (FRC), and a 4-gas monitor. All contractors and visitors are responsible for providing their employees with the appropriate training on and use of PPE while on Nickel Road locations. In addition, all contract personnel entering an Nickel Road location to perform work must understand and abide by Nickel Road's contractor expectations relating to environmental, health, and safety requirements.

The primary hazards that any person must be aware of while on a Nickel Road production location include, but are not limited to, the potential for release of hydrocarbon gases and/or liquids from production equipment/tanks, heavy truck and equipment traffic, loud noise, high pressures, and the potential for a flash fire. These hazards can vary depending on the work being performed.

b) Emergency Muster / Assembly Point(s)

DeHaan South Well Pad & DeHaan South Facility Pad: SWSW of Section 17 of Township 7 North, Range 65 West

Muster Point: Where access road meets pad location

c) 911 Address and GPS Coordinates

COGCC Location ID:	TBD (Application Currently Pending Approval) Form 2A Doc #s: 401528729 (Facility Pad), 401515579 (Well Pad)
Legal Description:	SWSW of Section 17 of Township 7 North, Range 65 West
Address:	No address available for Parcel #s 070917300055 & 070917300056
Driving Directions:	From the intersection of Weld County Road 39 and Weld County Road 80, thence east on Weld County Road 80 for 1,100 feet, thence north for 60 feet to proposed production facility of the well pad.
Latitude / Longitude:	40.570841 / -104.694543 (center of pad) 40.567732 / -104.692514 (entrance of access road)

d) Site Description

The DeHaan South Well Pad & DeHaan South Facility Pad (located in the SWSW of Section 17 of Township 7 North, Range 65 West) is a Nickel Road Operating oil and gas production facility that will have up to twelve (12) horizontal oil and gas wells along with up to fifteen (15) 500 barrel crude oil storage tanks and up to four (4) 500 barrel produced water tanks located inside a lined secondary containment structure.

e) [Nearby Schools and Other Areas of Interest](#)

None within 2500' of location.

f) [Directions to Project Location](#)

DeHaan South Well Pad & DeHaan South Facility Pad: SWSW of Section 17 of Township 7 North, Range 65 West

From the intersection of Weld County Road 39 and Weld County Road 80, thence east on Weld County Road 80 for 1,100 feet, thence north for 60 feet to proposed production facility of the well pad.

g) [Location of SDS Sheets, Sign-In Sheets, JSA, Safety Forms](#)

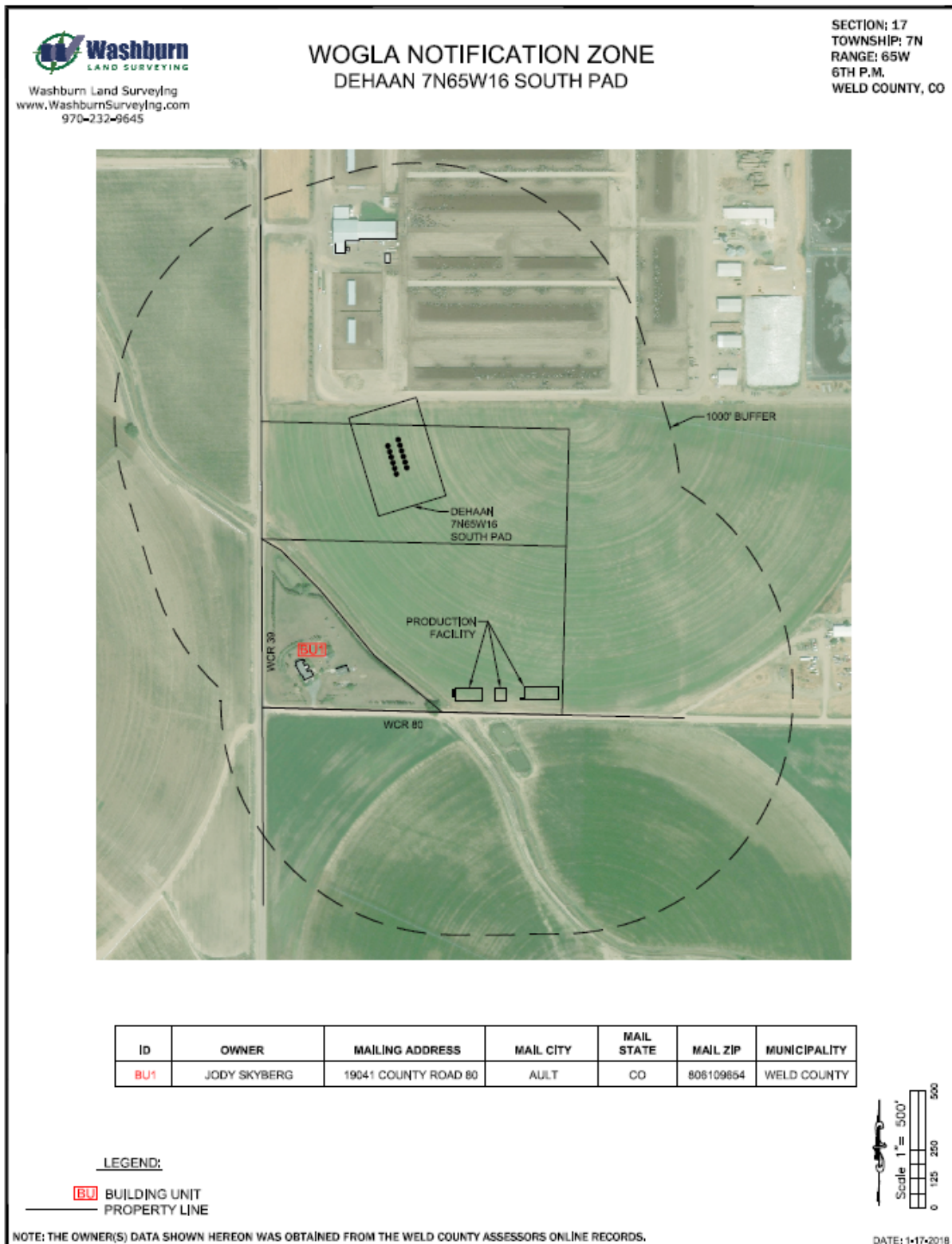
Depending on the operations taking place on location, the chemicals that may be present will vary. Regardless, hazard communication is a critical safety measure and Safety Data Sheets (SDS's) will be available from the Company Representative present or the contractor performing work on location.

During drilling and completion activities all employees and approved visitors to the DeHaan South Well Pad & DeHaan South Facility Pad (located in the SWSW of Section 17 of Township 7 North, Range 65 West) will be required to sign in by wellsite supervisor on duty and will be provided with a detailed safety briefing of current operations and all safety precautions that must be adhered to while on location. In addition, all who enter the location must also sign out upon their departure. Security personnel are required to account for all persons entering or leaving location during active operations and in the event of an incident.

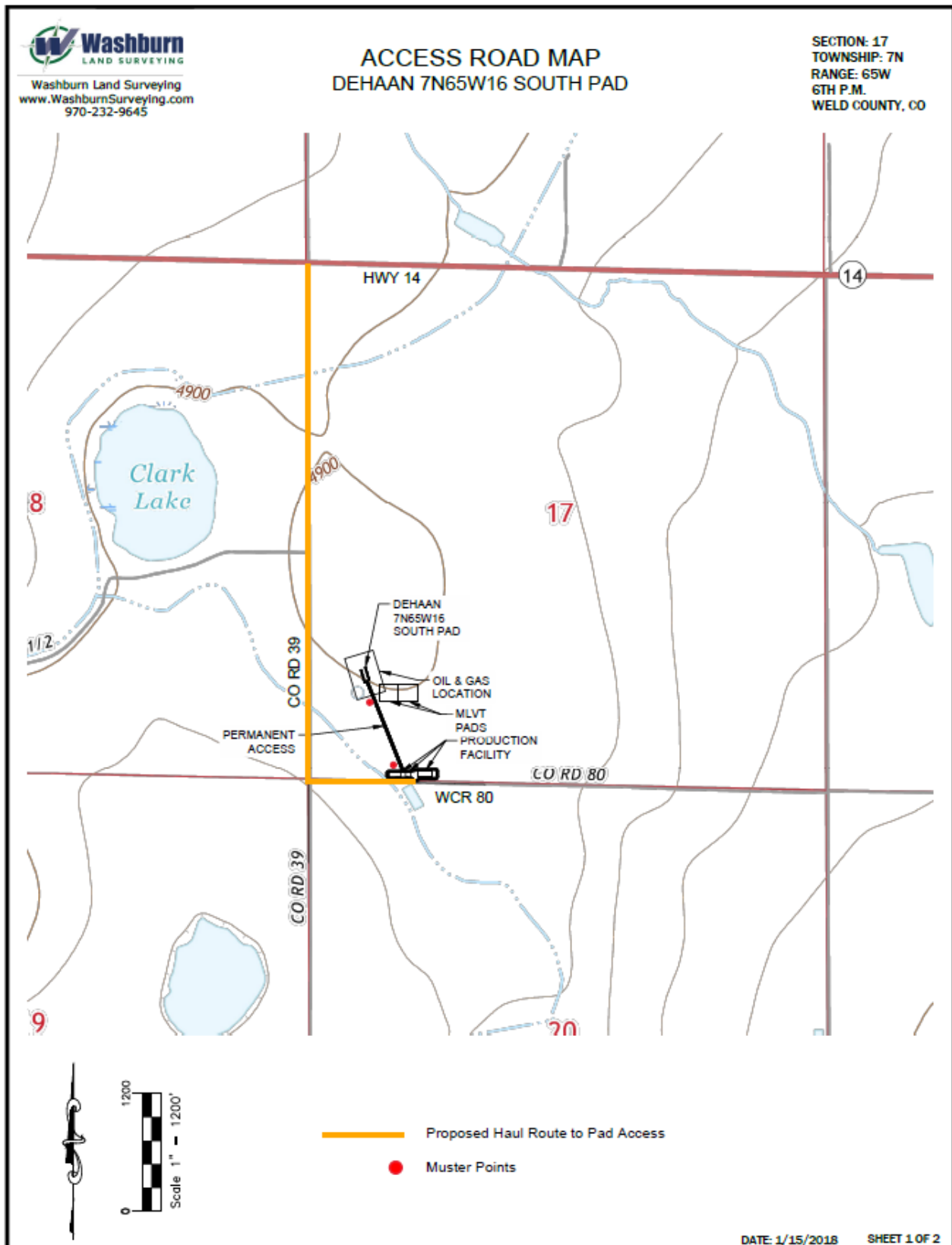
Once drilling and completion activities are finalized, the site will transition to its production phase and no unauthorized personnel will be allowed on location without first contacting a company representative. At this point, the primary chemicals stored on site will be crude oil and produced water.

Section 2 – Maps & Documents

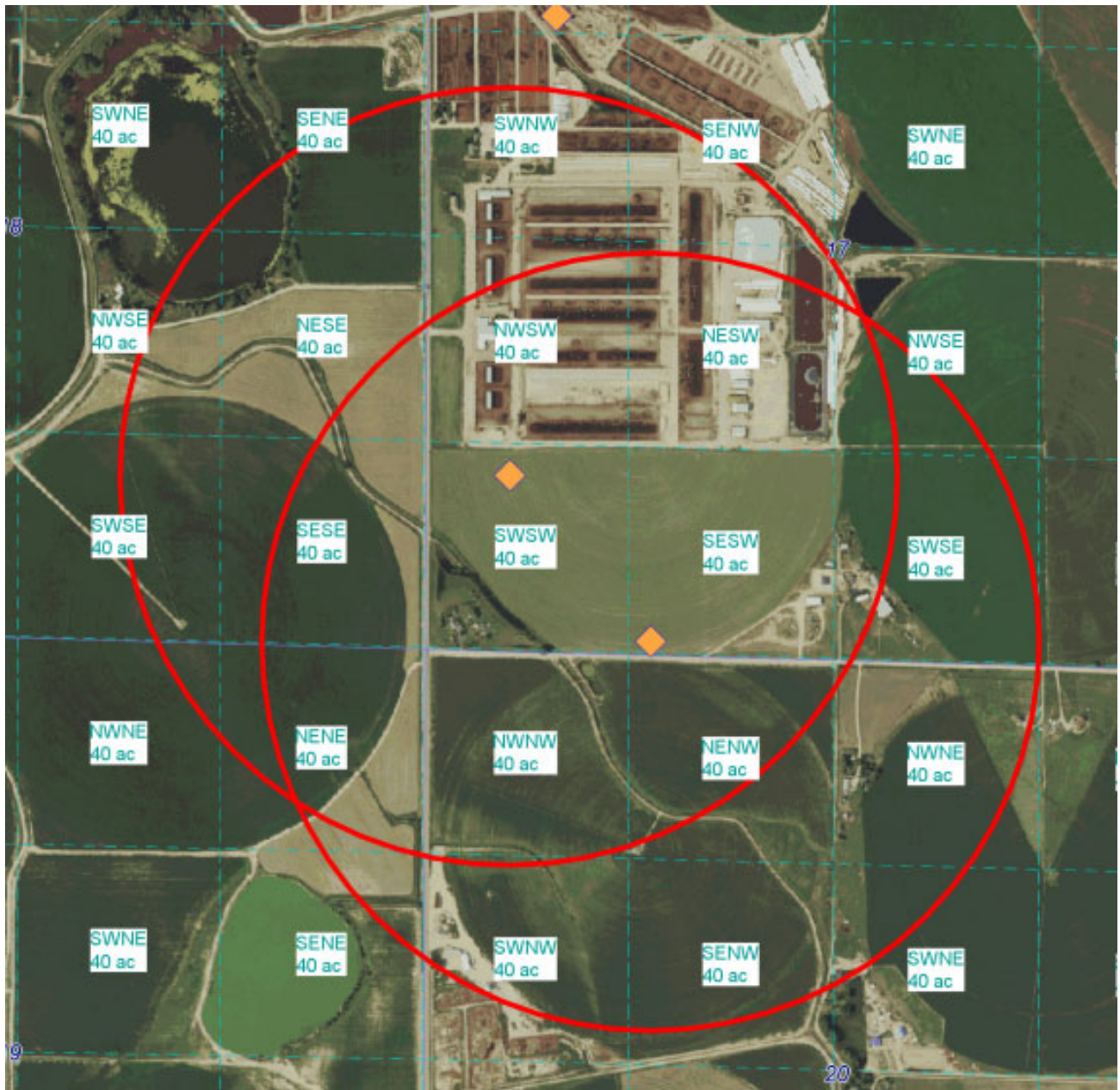
a) 1,000' Buffer and Location of Nearest Building Unit



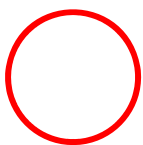
b) Access Map and Muster Point



c) 2500' Buffer Zone



Pad Location (Form 2A Reference Point)



2500' Buffer

Section 3 – List of Emergency Contacts

a) Nickel Road Contact Information

Name	Office Phone	Emergency / Cell
NRO Corporate Office 600 17 th Street, Suite 610 S Denver, CO 80202	303-226-7375	720-336-8517
Dana Johnson President / VP Operations	303-226-7375 x2	720-315-8487
Jennifer Lind Regulatory & Environmental Manager	303-226-7375 x4	303-406-1117

b) Nickel Road Community / Media Relations Contact Information

Name	Office Phone	Cell Phone
Andrew Haney President	303-226-7375 x3	303-748-2905
Jennifer Lind Regulatory & Environmental Manager	303-226-7375 x4	303-406-1117

c) First Responder Contact Information

Name	Emergency	Office Phone
Ault-Pierce Fire Department	911	970-834-2848
Weld County Sheriff	911	970-356-4015
Colorado State Highway Patrol	911	970-506-4999

d) Regulatory / Government Agency Contact Information

Name	Office Phone
Colorado Oil and Gas Conservation Commission (COGCC)	303-894-2100
Colorado Department of Public Health and Environment (CDPHE)	877-518-5608
Colorado Parks & Wildlife (CPW)	303-291-7227
National Response Center	800-424-8802
Weld County Sheriff	911 or 970-356-4015
Jason Maxey Weld County LGD	970-400-3579

e) [Nearest Hospital](#)

Hospital Name	Address	Phone Number	Mileage / Drive Time
North Colorado Medical Center	1801 16th St Greeley, CO 80631	970-810-4121	Approximately 14 miles (24 minutes drive time)
Poudre Valley Hospital	1024 S Lemay Ave Fort Collins, CO 80524	970-495-7000	Approximately 26 miles (33 minutes drive time)

f) [Spill Response Organization Contact Information](#)

Name	Office Phone	Emergency / Cell
Dana Johnson President / VP Operations	303-226-7375 x2	720-315-8487
Jennifer Lind Regulatory & Environmental Manager	303-226-7375 x4	303-406-1117

g) [Fire / Explosion Associated with Loss of Well Control Contact Information](#)

Name	Office Phone
Ault-Pierce Fire Department	970-834-2848
Wild Well Control Inc.	281-353-5481
North Colorado Medical Center	970-810-4121
Roy Rudsill Weld County Office of Emergency Management	970-304-6540

h) [Railroad Emergency Response Contact Information](#)

Name	Office Phone
Union Pacific Railroad	888-877-7267

Section 4 – Spill Response and Reporting

a) Spill Response

There are multiple types of hydrocarbons which can be released/spilled during oil and gas production and exploration. Most commonly released are unrefined products such as crude oil and produced water. Refined petroleum products such as diesel, gasoline, and motor oil spills are less common, but still equally important to mitigate. If a spill is found reportable, it will be mitigated in accordance with Colorado Oil and Gas Conservation Commission (COGCC) and Colorado Department of Public Health and Environment (CDPHE) guidelines.

Once a release has been identified, it will be immediately stopped and contained if possible and is safe to do so. When containing a spill; pig blankets, snakes, absorbent materials, or earthen berms will be constructed around the release to keep material from spreading. These materials will be provided by Nickel Road and the contract company and kept on-site. Diligent efforts will be made to minimize contact with live vegetation or open water if release is outside of secondary containment structures.

In the event of a large incident requiring outside assistance, Nickel Road has contracted with Clean Harbors. Clean Harbors possesses a working knowledge of oil and gas operations, emergency response and Incident Command. Once notified Clean Harbors personnel can be on location within 12 hours.

b) Spill Reporting

What determines a reportable spill and to whom does the report go?

- A spill/release will be reported to the COGCC if released material is property of Nickel Road and meets the COGCC reporting thresholds (see below), an example would be crude oil released from a separator or produced water from a water vault.
- A spill/release will be reported to the CDPHE if released material is in the custody of a third party for spills that meet CDPHE reporting thresholds, are of any size that impact or threaten to impact waters of the state, a residence or occupied structure, livestock or public byway. An example would be an oil hauler over filling a truck and spills product onto the ground next to a flowing irrigation ditch.

There are three release volume thresholds which determine if a hydrocarbon spill is reportable:

1. If crude oil or produced water is released INSIDE secondary containment and volume is greater than 5 barrels.
2. If crude oil or produced water is OUTSIDE secondary containment and volume is greater than 1 barrel.
3. If more than 25 gallons of petroleum product such as diesel, gasoline or motor oil is spilled OUTSIDE of secondary containment.

Once a spill is determined reportable, there is a 24 hour deadline to make initial notification to the COGCC or CDPHE depending on product ownership. Spills/releases in the custody of Nickel Road will be reported by a Company representative. Spills/releases in the custody of a third party will be reported by the responsible company's EHS Department to the appropriate agency and to Nickel Road.

These regulatory guidelines will be strictly followed by Nickel Road and any contractors operating under Nickel Road guidance during all activities at the **DeHaan South Well Pad & DeHaan South Facility Pad** (located in the SWSW of Section 17 of Township 7 North, Range 65 West).

Section 5 – Evacuation Plan Procedures

The procedure to be used in alerting nearby persons in the event of any occurrence that could pose a threat to life or property will be arranged and completed with public officials in detail.

In the event of an actual emergency, the following steps will be immediately taken:

1. The Nickel Road representative will immediately notify proper authorities, including the sheriff's office, highway patrol, and any other public officials as described above and will enlist their assistance in warning residents and transients in the calculated radius of exposure.
2. The Nickel Road will coordinate with local authorities to warn residents' down-wind of the location and within radius of exposure from the well site. Additional evacuation zones may be necessary as the situation warrants.
3. The Nickel Road representative will coordinate with appropriate emergency personnel to divert traffic in the vicinity away from the potentially dangerous area. No trespassing and warning signs will be posted at the entrance to the well site. The contract company will monitor essential and non-essential traffic on-site.
4. General:
 - a. The area included within the radius of exposure is considered to be the zone with the maximum potential hazard. When it is determined that conditions exist which create an additional area (beyond the initial zone of maximum potential hazard) vulnerable to possible hazard, public areas in the additional hazardous area will be evacuated.
 - b. In the event of a disaster, after the public areas have been evacuated and traffic stopped, it is expected that local civil authorities will have arrived and within a few hours will have assumed direction of and control of the public, including all public areas. Nickel Road will cooperate with these authorities to the fullest extent and will exert every effort by careful advice to such authorities to prevent panic or rumors.
 - c. Nickel Road will dispatch appropriate personnel to the disaster site as soon as possible. The company's personnel will cooperate with and provide such information to civil authorities as they might require.

Section 6 – Coordination with First Responder Agencies

- a. Nickel Road will communicate drill spud, completion operations and Production Turn-In-Line dates to the Weld County Office of Emergency Management for coordination / communication with local first responders. These start dates will be provided a minimum of 7 business days prior to commencement or change in oil and gas development operations.
- b. In the event of an emergency requiring First Responders, Unified Command will be established between the Nickel Road appointed company man on location and First Responders present. Unified Command post will be established based on conditions present at time of incident.
- c. Nickel Road's EHS representatives and first responders identified in this Site Safety and Emergency Action Plan met on _____ to review this plan and discuss coordination of efforts in the event of an emergency situation requiring first responder assistance.

NICKEL ROAD

O P E R A T I N G

DeHaan South Well Pad & DeHaan South Facility Pad Weld County, Colorado

Facility Latitude / Longitude:
40.570841 / -104.694543

**All Emergencies will be
reported through 911**

Notifications

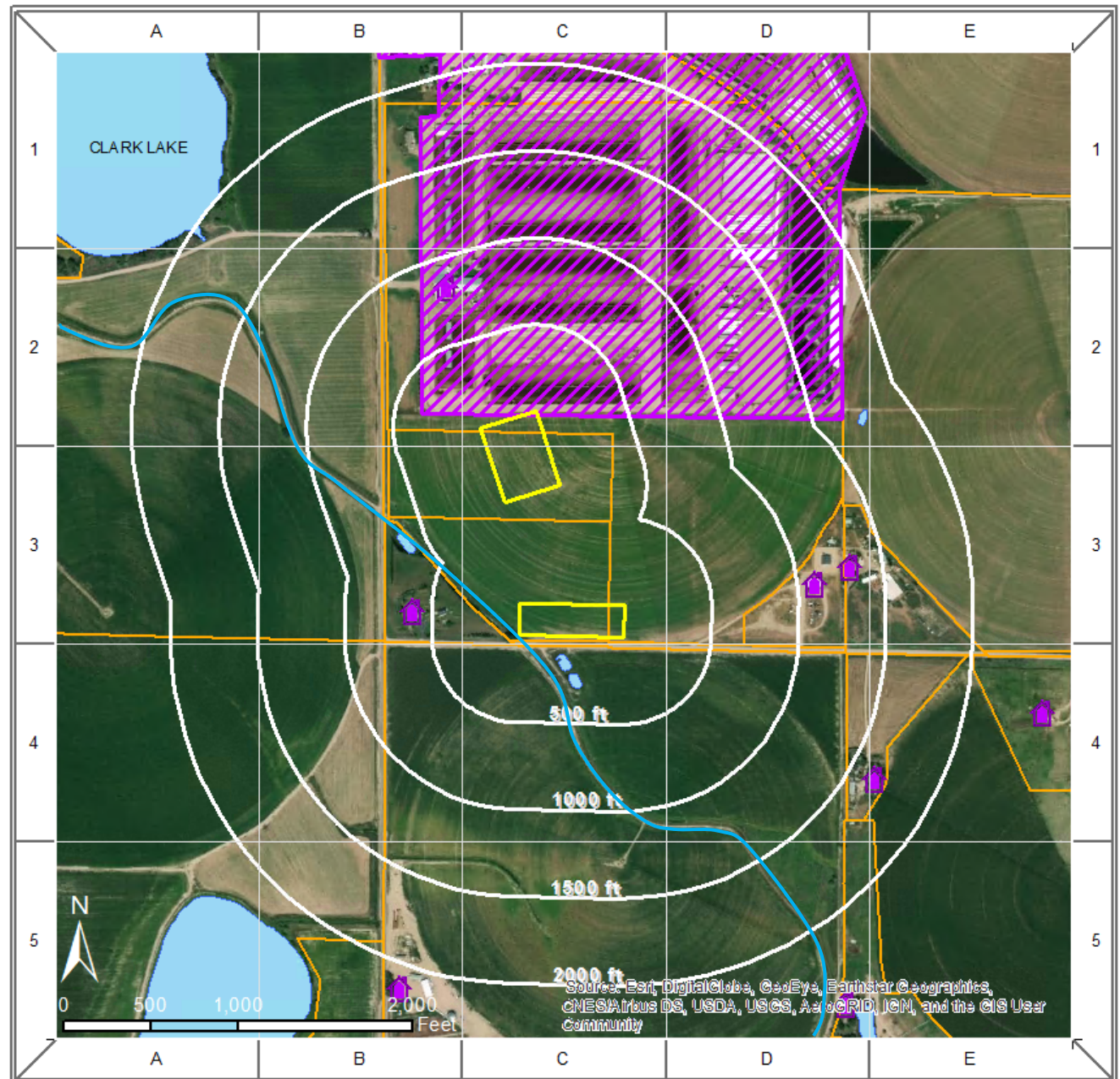
1. National Response Center
800-424-8802
2. Nickel Road Emergency Response Coordinator
720-336-8517
3. Colorado Department of Natural Resources
303-866-3311
4. EPA Region VIII
303-312-6312
5. Weld County OEM
970-304-6540

Response Objectives

Minimize the impact to the environmental and local community. Contain and recover released product to the extent possible.

Critical Receptors

1. Irrigation Canals
Owl Creek (~800' SE), Eaton Ditch (~1700' SE)
2. Schools
None in vicinity
3. Surrounding Residential Properties
None in vicinity
4. Surrounding Businesses
None in vicinity



DeHaan South Well Pad
DeHaan South Facility Pad



L&M Farms
(Dairy Farm)



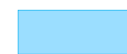
Parcel Boundary



Building Unit



Eaton Ditch



Water Body

TACTICAL RESPONSE CHECKLIST

After assessing the incident level and contacting the appropriate parties, the following steps will need to be taken for the tactical response:

1. Implement National Incident Management System (NIMS) Incident Command System (ICS)
2. Assess hazards to site, workers, and public
3. Safety Officer should complete form ICS 208 – Safety Message/Plan
4. Conduct Job Safety Briefing
5. Assess property and environmental impacts
6. Develop ICS 201 Incident Briefing and ICS 202 – Incident Objectives
7. Implement response actions:
 - a) Confine spills to tanks/vessels
 - b) Locate leading edge of spilled material
 - c) Contain spills on ground and any surrounding drainage ways
 - d) Recover spilled materials
 - e) Dispose of recovered materials properly
8. Document site conditions and activities
9. Document impacts to natural, economic, and cultural resources
10. Document site restoration/remediation activities

See the Nickel Road Emergency Response Plan for the full list of NIMS ICS Forms.

DEHAAN SOUTH PAD STATS

FLOW STATS – 30 DAY AVG IP

Gas (MCF/D)	Oil (BBL/D)	Water (BBL/D)
1000	400	850

WELL PAD CONTAINMENT STORAGE

CY	MMGAL	BBL
10	210,000	5,000

RESPONSE RESOURCE CONTACT INFORMATION

NICKEL ROAD OIL AND GAS CONTACT INFORMATION

Name	Main Phone
NRO Emergency Line (24 hr)	720-336-8517

STATE, FED, MUNICIPAL EMERGENCY RESPONDERS

Name	24-Hr Phone
Weld County OEM	970-304-6540
Weld County Sheriff	970-356-4015
Ault-Pierce Fire Department	970-834-2848
National Response Center	800-424-8802
CO Dept of Natural Resources	303-866-3311
COGCC	303-894-2100
CDPHE	877-518-5608
EPA Region 8	303-312-6312
Department of Transportation	855-368-4200

RESPONSE CONTRACTORS

Type	Name	24-Hr Phone
Environmental	Clean Harbors	800-645-8265
Well Control	Wild Well Control	281-784-4700
Spill Response	Clean Harbors	800-645-8265
Roustabout	Element Services	970-518-2460

RESPONSE OBJECTIVE CHECKLIST

SAFETY – PROTECT LIFE

- ❖ Evaluate and account for all personnel
- ❖ Isolate all potential ignition sources
- ❖ Initiate emergency services immediately, as needed (911, Fire, LEPC)
- ❖ Identify hazard(s) of emitted material (obtain SDS)
- ❖ Establish site control (safe perimeter and evacuation routes)
- ❖ Monitor air in impacted areas
- ❖ Develop Site Safety Plan (ICS 208) and Medical Plan
- ❖ Continually assess site hazards and risks

RESPONSE – INCIDENT STABILIZATION

- ❖ Conduct notifications to external agencies and internal personnel
- ❖ Identify and implement staging areas to support response operations
- ❖ Activate response company for equipment and manpower as needed
- ❖ Activate response tactics to contain and recover product/material
- ❖ Establish command post and field communications
- ❖ Establish flight traffic restriction if required
- ❖ Provide personnel and equipment support as required
- ❖ Implement waste handling and disposal procedures as required
- ❖ Initiate decontamination and demobilization procedures when appropriate

ENVIRONMENTAL – PROTECT THE ENVIRONMENT

- ❖ Identify, prioritize, and protect environmentally sensitive areas
- ❖ Establish wildlife rescue rehabilitation operations if required
- ❖ Verify release if waters are impacted
- ❖ Conduct visual assessments (spill tracking and surveillance)