

OPERATIONS SAFETY MANAGEMENT PLAN

Twin Bridges Resources LLC has prepared this Operations Safety Management Plan for the Red Rocks 35-15 exploratory helium gas well in Las Animas County, Colorado. The sections below correspond to Colorado Oil & Gas Conservation Commission requirements in Rule 304.c.(7) to prepare an Operations Safety Management Plan consistent with the criteria in Rule 602.d and COGCC guidance (February 16, 2021).

The purpose of the Plan is to establish practices for the safe operation of helium gas well locations for both people and the environment. The Plan describes the change management program and a pre-start up safety review.

1. CHANGE MANAGEMENT PROGRAM (CMP)

The helium gas well location will contain only a wellhead, meter, and buried flowline during production. The Change Management Program for the operation is described below and in the attached checklist.

Table 1. Change Management Program

Function	Procedure
Procedure for Change Documentation	Changes to technology, equipment, and procedures will be documented using a Change Management Checklist.
Records Storage Location	The operator will maintain records related to change management in their Denver, Colorado office.
Records Storage Duration	The operator plans to keep change management records for a minimum of 5 years.
Record Availability	The operator intends to make records available for inspection within 10 days of a request for review.
Record Updates	The operator will review records a minimum of annually to ensure that information is up to date. Records will be replaced when necessary, such as parts replacement.
Basis and Purpose for Change	The Change Management Checklist will identify the basis and purpose for a change.
Identifying Potential Impacts	The Change Management Checklist will record potential impacts to public health, safety, welfare, and the environment resulting from the change, including beneficial impacts and impacts that may occur from not implementing the change.
Training	If a change results in new procedures, the site operator will be briefed and trained on the procedures.
Approval for Changes	Only the appropriate management-level employee will be authorized to approve changes.
Permanent v. Temporary Change	Changes will be identified on the Change Management Checklist as permanent or temporary.
Duration for Temporary Changes	The duration for temporary changes will be identified on the Change Management Checklist for follow up.

2. PRE-START UP SAFETY REVIEW (PSSR)

The Pre-Start Up Safety Review is described here and in the attached checklist. The site operator and off-site supervisor will review the list as part of facility readiness for helium well production. Review will include features

that may represent a risk to the operator, public health, safety, or environment. Findings will become part of the operator record. Changes to the wellhead or location will receive similar review.

For pre-start up, the wellhead, meter, and flowline will be visually and manually inspected. The system then will be pressure tested to maximum manufacturer operating pressure for the specified duration.

3. BEST MANAGEMENT PRACTICES

Twin Bridges will perform the following practices:

- Orientation and training for the site operator in proper operation, inspection, maintenance of equipment and change management.
- Contractors and vendors working on the location will be supervised by the site operator when it is necessary to do so to maintain safe operations.
- Work orders and invoices that provide a record of changes made to the wellhead or location will be maintained in the operator's Denver, Colorado office.
- Specific health, safety, and environmental practices are described in the HSE Handbook (2020) prepared for operations.

Attachments:

Change Management Checklist

Pre-Start Up Safety Review Checklist

CHANGE MANAGEMENT CHECKLIST

Location Name:	
COGCC Location ID:	
Date Change Occurred:	

Description of Change: Technology / Equipment / Procedure	
Basis and Purpose for Change:	
Potential Impacts: Public Health, Safety, Welfare, Environment. Include Beneficial Impacts or Impacts that May Occur from Not Implementing the Change.	
Is the Change:	Permanent / Temporary (circle one)
	Duration of Temporary Change:
Updates Needed to Training or Inspection Procedures:	
Location of Documentation: E.g., Vendor Information or Invoice	

Employee Name/Title:	
Employee Signature:	
Date:	
Approver Name/Title:	
Approver Signature:	
Date:	

PRE-START UP SAFETY REVIEW CHECKLIST

Location Name:	
COGCC Location ID:	
Date of Safety Review:	

Is Start Up:	New Operation / Modification (Circle One)
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Equipment	
Wellhead:	
Wellhead Valve:	
Meter:	
Flowline Polyweld to Steel Fitting:	
Flowline Above-ground:	
Flowline Below-ground:	
Signage Entrance:	
Signage Wellhead:	
Stormwater Controls:	

Employee Name/Title:	
Employee Signature:	
Date:	