

Operations Safety Management Plan

Sammons Ranch

Helium Gas Wells

315310C, 315310D

315315A, 315315C



August 2021

1.0 Introduction

This Operations Safety Management Plan (Plan) has been prepared by Vecta Oil & Gas, Ltd. (Vecta) for its Sammons Ranch helium gas wells in Las Animas County, Colorado. The Plan addresses the Colorado Oil & Gas Conservation Commission (COGCC) requirement at Rule 304.c.(7) to prepare an Operations Safety Management Plan in accordance with Rule 602.d and COGCC guidance (February 16, 2021). The plan helps to ensure the safe management of the helium gas well locations for people and the environment by providing procedures for change management and a pre-start up safety program.

2.0 Change Management

During production, the Oil and Gas Location will contain only a single vertical helium gas well, meter, and buried polyethylene flowline. The Change Management Program is described in Table 1 and in the attached checklist.

Table 1. Change Management Program¹

Activity	Procedure
Procedure for Change Documentation	Changes to technology, equipment, and procedures will be documented using a Change Management Checklist (attached).
Records Storage Location	Vecta will maintain records in hard and electronic files in its Denver, Colorado office.
Records Storage Duration	Vecta will maintain change management records for a minimum of 5 years.
Record Availability	Vecta will make records available for inspection within 10 days of a request for review.
Record Updates	The Site Supervisor 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 be used to identify the basis and purpose for a change.
Identifying Potential Impacts	The Change Management Checklist will be used to 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.
Approval for Changes	The Operator is expected to be the primary source for recommended parts or configuration changes to the wellhead and operations. Changes more significant than basic maintenance will be approved by the Site Supervisor.
Permanent v. Temporary Change	Temporary changes will be designated as such on the Change Management Checklist.
Duration for Temporary Changes	The duration for temporary changes will be identified on the Change Management Checklist for follow up.

¹Change Management will be conducted by the following:

Vecta = Denver corporate office

Site Supervisor = Off-location Vecta supervisor

Operator = On-location contractor

3.0 Pre-start Up Safety Review (PSSR)

Pre-Start Up Safety Review procedures are listed in the attached checklist. The Operator and Site Supervisor will review the list as part of facility readiness for helium well production or continued production. Review will include features that may represent a risk to the Operator, public health, safety, or the environment. Findings will become part of the site records. Subsequent changes to the wellhead or location will receive similar review.

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

4.0 Best Management Practices

The following best management practices will help to implement change management and the PSSR program:

Table 2. Best Management Practices

Best Management Practice
<ul style="list-style-type: none"> The Operator will receive an orientation and training for operation, monitoring, and maintenance specific to the location.
<ul style="list-style-type: none"> Prior to operation, the Site Supervisor will review site readiness with the Operator. Review will include wellhead features, well pad maintenance, access roads, flowlines, and site security. Potential for risk to public health, safety, welfare, or the environment will be discussed at that time. Discussion will identify whether adjustment is needed for resources, materials, or practices to minimize potential risks. Significant changes will be documented as part of change management for the location.
<ul style="list-style-type: none"> Contractors and vendors working on the location will be supervised by the Operator when it is necessary to do so to maintain safe operations.
<ul style="list-style-type: none"> The Operator will be responsible for recommendations to improve operation of the site to avoid impacts to public health, safety, welfare, and the environment. Significant changes will require approval from the Site Supervisor for the location.
<ul style="list-style-type: none"> The Operator will be trained on changes that are not initiated locally. Documentation of significant changes will be maintained in Vecta's Denver, Colorado office.
<ul style="list-style-type: none"> Vendor sheets and invoices will be attached to the Change Management Checklist where needed to describe changes at the location.
<ul style="list-style-type: none"> Vecta's standard health and safety practices will be used to supplement the information provided in this Plan.

CHANGE MANAGEMENT CHECKLIST

LOCATION NAME:
COGCC LOCATION ID:
DATE CHANGE OCCURRED:

DESCRIPTION OF CHANGE:
BASIS AND PURPOSE OF CHANGE:
POTENTIAL IMPACTS (Public health, safety, welfare, the environment. Include beneficial impacts. Include impacts that may occur if the change is not implemented. Continue on the reverse, if necessary):

Check All That Apply

- 1. The change is temporary. Specify duration: _____
- 2. Updates are needed to training or inspection procedures. Specify: _____

- 3. The change is documented. Specify documentation and location: _____

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:

START UP IS (Circle One):	
New Operation	Modification

EQUIPMENT CHECK (Check All That Apply and Findings)

- Wellhead:

- Wellhead Valves:

- Meter:

- Flowline Polyweld to Steel Fitting:

- Flowline Above-ground:

- Flowline Below-ground:

- Sign at Entrance:

- Sign at Wellhead:

- Stormwater Controls:

Employee Name / Title: _____
 Employee Signature: _____
 Date: _____