

St. Croix Operating, Inc.  
Washington County, Colorado

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OPERATIONS SAFETY MANAGEMENT PROGRAM PLAN

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St. Croix Operating, Inc. (St. Croix), has drafted this plan in accordance with COGCC Rule 304.c.(7) and 602.d. The intent of this plan is to establish operational practices and procedures for safety for Change Management and Pre-Startup Safety for New Locations.

The Change Management Program will describe how St. Croix records changes to technology, equipment, and procedures. It will also describe changes to facilities that will affect a process.

The Pre-Startup Safety Review will delineate how St. Croix conducts the safety and technical review inspection prior to startup of any new or modified equipment or process at a location.

St. Croix staff allowed to approve changes to equipment changes will be employed in a manager-level position.

**CHANGE MANAGEMENT PROGRAM**

*Recordkeeping*

|                                |  |
|--------------------------------|--|
| Record Storage Location        | St. Croix will keep records related to change management decisions at their main office in Denver, CO. |
| Record Storage Timeline        | St. Croix intends to keep change management decision records for 5 years.                              |
| COGCC Record Request Timeframe | St. Croix is committed to providing records requested by COGCC within two weeks of their request.      |
| Records Updated                | St. Croix will review the records and update them at a minimum of annually.                            |

### *Documentation*

St. Croix will utilize a Change Management Checklist to document changes in process and equipment. The checklist will be saved in the well file at St. Croix's main office.

## **PRE-STARTUP SAFETY PROGRAM FOR NEW LOCATIONS AND MODIFIED LOCATIONS**

### *Safety and Technical Review*

Prior to Startup, St. Croix will review the equipment on location with field personnel and conduct a visual inspection of equipment connections prior to startup of equipment.

St. Croix will utilize a checklist to ensure new equipment and equipment connections have been visually inspected prior to startup. The startup checklist will be saved in the well file at St. Croix's main office.

Where recommended by the manufacturer, St. Croix personnel will perform an initial pressure test on pressurized equipment and new on-location flowlines prior to confirm safe installation of the new equipment. Pressure tests will be kept in the well file.

For all other proposed equipment, a function test will be performed as per manufacturer's recommendations prior to utilizing the equipment in daily operations.

Measurement equipment changes will be calibrated in accordance with manufacturer recommended specifications and all pertinent regulations prior to being implemented in operations.

# Change Management Checklist

|                                 |  |
|---------------------------------|--|
| <b>Location Name:</b>           |  |
| <b>COGCC Location #:</b>        |  |
| <b>Date of Proposed Change:</b> |  |

The proposed change is:

Temporary

Permanent

|   |  |
|---|--|
| If Temporary, how long will the change be in place: |  |
|---|--|

|   |  |
|---|--|
| Basis for Proposed Change and Why it is Necessary   |  |
| Potential Impacts to Public Health, Safety, Welfare, and the Environment that may occur from implementing or not implement the change |  |

|                           |  |
|---------------------------|--|
| <b>Employee Signature</b> |  |
| <b>Employee Name</b>      |  |
| <b>Employee Title</b>     |  |

# Pre-Startup Safety Review Checklist

|                               |  |
|-------------------------------|--|
| <b>Location Name:</b>         |  |
| <b>COGCC Location #:</b>      |  |
| <b>Date of Safety Review:</b> |  |
| <b>Date of Startup:</b>       |  |

The proposed startup is for:

- New Location
  Modified Location

**Equipment on Location**

- Wellhead                      Quantity: \_\_\_\_\_
- Oil Tanks                        Quantity: \_\_\_\_\_
- Water Tanks                      Quantity: \_\_\_\_\_
- Separator                        Quantity: \_\_\_\_\_

- Pit                                       Pump Jack                       Flare
- Meter House                       VOC Combustor                 ECD

Flowlines:                       Above-Ground                       Buried

**Signage**

- Location Entrance                       Wellhead                       Tank Battery

**Visual Inspections**

- Flowline Connections                       Wellhead Valves
- Tank Valves                                       Bradenhead
- Thief Hatch

**Pressure Tests**

| Equipment | Recommended Pressure | Tested Pressure |
|-----------|----------------------|-----------------|
| Flowlines |                      |                 |
| Separator |                      |                 |
|           |                      |                 |