

Operations Safety Management Plan – 304.c.(7)

Federal RG 11-13-298 Oil and Gas Location

New Location

April 2022



INTRODUCTION

TEP Rocky Mountain LLC (“TEP”) has prepared the following Operations Safety Management Plan to address the requirements under the Colorado Oil and Gas Conservation Commission (“COGCC”) Rule 602.d, which requires operators to establish and maintain a written operations safety management program to address change management and pre-startup safety procedures for all new and existing Oil and Gas Locations. TEP strives to conduct all operations in a safe and orderly manner to eliminate and/or minimize the potential for injury, accidents, spills, or any potential impacts to public health, safety, welfare, the environment, and wildlife resources. This Operations Safety Management Plan details the key elements of TEP’s change management program and the pre-startup safety review for changes made to any new or existing Oil and Gas Location.

CHANGE MANAGEMENT PROGRAM

Purpose

The purpose of the Change Management Program is to establish the process by which changes to equipment and operational procedures are documented for an Oil and Gas Location. The process by which changes are made to equipment and operational procedures is critical to the safe and effective operation of the facility, worker safety, and minimize potential impacts to public health, safety, welfare, the environment, and wildlife resources.

Scope

A change review will be administered by personnel in the Engineering Department and the Operations Department with assistance from the Safety Department and will address the elements outlined in the COGCC regulations. A change review will be conducted on proposed new equipment and proposed significant modifications to existing equipment as applicable in the regulations.

Program

This change management program is in place to assure that the following items have been adequately addressed prior to installing new equipment or significantly modifying existing equipment:

1. The technical basis for the proposed change,
2. Potential impacts on existing facilities and equipment,
3. Required modifications to operating procedures,
4. Potential impacts on employee safety and health, and
5. Potential impacts on the environment (i.e., air emissions, Spill Prevention, Stormwater).

Implementation

A change review meeting will be conducted to thoroughly review proposed changes to ensure that all equipment is properly designed prior to construction or installation. The meeting participants may include, but are not limited to, Subject Matter Experts (SME) from the Operations Department, Engineering Department, Measurement Department, and the Environment Health & Safety Department. In addition, a Pre-Startup Safety Review (PSSR) will be conducted prior to startup of the new or modified equipment.

All changes will be reviewed, documented, and approved by each department’s manager prior to installation and operation of the equipment, or execution of changes to operational procedures.

Documentation

The change review meeting will be documented along with any recommendations resulting from the review. Documentation of the changes will include the following elements:

1. Date of Change Review Meeting
2. Attendees of Review Meeting
3. Purpose for the Change
4. Description of Equipment or Procedural Change
5. Evaluation of Potential Impacts to Employee Safety
6. Evaluation of Potential Impacts to Public Health, Safety, Welfare, and the Environment

Records Keeping

All documentation of the proposed change to equipment or facilities at a site will be kept on record on TEP's internal servers for a period of no less than five (5) years. Upon formal written request by the COGCC, TEP will provide documentation of the specific change, as outlined above, to the COGCC within thirty (30) days of the request.

PRE-STARTUP SAFETY REVIEW

Purpose

The purpose of the Pre-Startup Safety Review ("PSSR") ensures that a safety and technical review of the proposed operation is conducted prior to startup of any new or modified equipment or implementing any new operational procedure at an Oil and Gas Location.

Scope

A PSSR will be administered by personnel in the Operations Department (e.g. Superintendents, Supervisors, Field Technicians, Measurement Technicians) with assistance from the Safety Department, and will address the elements outlined in the regulations. PSSRs will be conducted on newly installed and significantly modified equipment as applicable in the regulations.

Program

The objective of the PSSR program is to assure that the following items have been adequately addressed and are in place prior to start-up of any new or significantly modified facility or process:

1. Construction and modifications are in accordance with the design specifications and applicable codes.
2. Necessary safety, operating, maintenance and emergency procedures are in place and are adequate.
3. All safety and operability recommendations have been addressed and actions necessary for startup have been completed.
4. The training of each employee and/or contractor involved in the operating process has been completed.

Implementation

A walk-through inspection of newly installed or significantly modified equipment will be conducted prior to introducing fluids (e.g., natural gas, oil, condensate, water) to the equipment. The inspection may be conducted by a team of qualified personnel or a Subject Matter Expert (SME) designated by the Facility Supervisor or Superintendent. The intent of the inspection is to ensure that all equipment is properly installed, and all safety equipment is functioning prior to startup.

Documentation

A PSSR Checklist will be used to document the inspection.

Operation Safety Management PSSR Checklist



Date: _____

Location: _____

1. Process Vessels and Piping

- ☐ Piping/vessels have been reviewed and approved by the Facilities Engineering Group
- ☐ All pipe fittings are connected and tightened according to manufacturer specifications
- ☐ All tubing fittings are connected and tightened according to manufacturer specifications

2. Instrumentation & Electrical

- ☐ I&E equipment has been reviewed and approved by the Facilities Engineering Group
- ☐ I&E equipment has been connected to a power source
- ☐ I&E equipment is functioning properly

3. Operability & Training

- ☐ Access to all valves/instruments, etc. is adequate for operation, isolation, and maintenance
- ☐ All gauges, meters, etc. are accessible and easy to read
- ☐ Platforms and ladders provide safe access to instruments, valves, PSVs, etc.
- ☐ Sample points/stations are easily accessible and oriented properly
- ☐ All necessary operating procedures have been written/updated
- ☐ Proper training/notification of personnel has been conducted

4. Safety & Environmental

- ☐ Working area is level/even, clear of debris, and free of slip hazards
- ☐ Area lighting is adequate for tasks required
- ☐ Tank vapor combustion equipment is functioning properly
- ☐ Storage tank spill containment is adequate and free of damage
- ☐ Stormwater BMPs are in place and free of damage
- ☐ All applicable signage is in place and legible

Actions to be completed **prior** to startup (PTS):

[illegible]

Actions to be completed **after** startup (AS):

[illegible]