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Overview

Purpose

This Devon Energy EHS Protocol defines the Emergency Preparedness process and what is required to be included in Emergency Response Plans and/or Office Emergency Action Plans for the workplace.


Scope

This protocol applies to all Devon operated equipment, facilities and all Devon employees. This protocol does not apply to Devon Energy Center.

Contractors are required to follow site-specific requirements, and have their own programs which comply with applicable laws and regulations.

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1.0 RESPONSIBILITIES

Division/Business Unit Leadership

- Ensure that emergency response plans and/or office emergency action plans are developed, maintained, and implemented for your area of responsibility.
- Set the example by using and holding others accountable to this protocol and provide resources or application of the protocol.
- Ensure employees receive required training.

Line Supervisor

- Understand how this protocol applies to personnel in their area of responsibility.
- Ensure employees have training, skills, knowledge and understanding to comply with this protocol.
- Check periodically to ensure the requirements of this protocol are being met.

Environmental, Health and Safety

- Provide technical resources and tools for protocol application.
- Monitor compliance through the review process.

Emergency Management

- Provide technical resources and tools for protocol application.
- Provide annual Incident Management Team training and exercises.
- Monitor compliance through the exercise process.
- Maintain and update the Security Control Center Emergency Contact List for the Incident Management Team.
- Establish the level of emergency response training for area personnel.

Devon Employees

- Adhere to the requirements of this protocol.
- Identify and report gaps in this protocol.
- Complete required training.

Contract Company Representative

- Comply with regulatory requirements and follow the Devon EHS protocol.


2.0 TERMS AND DEFINITIONS

2.1 Emergency Preparedness Terms and Definitions

Building Floor Warden - a floor warden who serves as a main distributor of information from the Life Safety Supervisor to floor wardens. Additionally the Building Floor Warden plays a leadership role in evacuations when there is an alarm or severe weather, helping to ensure that their area of the building has been cleared.

Emergency Management - a department within Devon that works to prevent and/or restore disruptions within key business processes caused by unplanned events or crises.

Emergency Management Leader - an individual within Devon responsible for administering the Emergency Management Program for U.S. Operations.

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Emergency Management Liaison - an employee(s) assigned by Division/Business Unit Leadership and Emergency Management to develop and maintain emergency response and/or office emergency action plans, for a given area, location or division. The employee is also responsible for serving as a liaison for Emergency Management in coordinating exercises and training for area personnel with Emergency Management, as well as maintaining relationships with local emergency response agencies.

Emergency Management Professional - an individual within Devon that works in the Emergency Management Program and is assigned to support designated field operating areas.

Emergency Response Plan - a written plan that defines actions and responsibilities for responding to a variety of emergency events.

Field Emergency Action Plan - a plan that defines specific actions and responsibilities for responding to a specific emergency event or site-specific risk (e.g., a condensate spill into a watercourse, high angle rescue, etc.).

Floor Warden - an individual trained and responsible for emergency response and building evacuations for a specific floor/office location.

Incident Command Post (ICP) - The location where the primary functions of incident management are performed.

Incident Command System (ICS) - a standardized, all-hazards incident management approach that:

- allows for the integration of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure;
- establishes positions within the response organization with common titles and responsibilities;
- enables a coordinated response among various jurisdictions and functional agencies, both public and private; and
- establishes common processes for planning and managing resources.

Incident Commander (IC) - the individual responsible for all incident activities, including the development of strategies and tactics and the ordering and release of resources. The IC has overall authority and responsibility for conducting incident operations and is responsible for the management of all incident operations at the incident site.

Incident Management Team (IMT) - a group of personnel assigned to manage an incident under the incident command system. Within Devon, IMTs exist at two levels - field and corporate.


Life Safety Supervisor - an individual in the U.S. Facilities Department that is responsible for developing office emergency action plans and maintaining the floor warden program in offices with 50 or more occupants assigned to it.

Local Emergency Planning Committee (LEPC) - a working group consisting of elected officials, emergency management, and public health professionals, environment, transportation, and hospital representatives, and representatives from community groups that work to understand chemical hazards in the community, develop emergency plans in case of an accidental release, and look for ways to prevent chemical accidents.

Office Emergency Action Plan - a plan that defines actions and responsibilities for responding to an office emergency. For offices with 10 or more occupants, this plan must be maintained in writing.

Site-Specific Response Plan - a one page document providing a geographical picture of the area, personnel actions, site information and emergency contacts.

Stakeholder - a person, group, organization or member that can be affected by an incident.

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Well Control Plan - a document that provides controls and preventive measures, as well as an action plan for well control management.

Zones - information used for planning purposes that reflects an area where significant exposure could result without prompt action. Areas included can be immediately around a well, pipeline, or facility, as well as areas where public protection measures may be required.

2.2 General Terms and Definitions

Area - individual operating fields or components that collectively comprise a Region; Areas normally include an area office.

Area Office - field office with assigned employees that support an area. (e.g., Cuero, Artesia, etc.).

Business Unit - individual components that collectively comprise a Division. Business Units may also be referred to as Basins.

Contract Company Representative - a contractor who is assigned responsibilities and oversight for a specific task that requires adherence to Devon EHS Protocols.

Division - the division operations of Devon are Canada, Strategic-Services, Corporate, Facilities and Pipeline and U.S.

Facility - the collection of tangible structures, piping, valves, vessels, tanks, compression, and processing equipment located in close geographic proximity, that are involved directly in the development, production, processing or delivery of oil and gas to market (e.g., a tank battery, drill site, well-site, compressor station, pipeline, and gas plant).


Line Supervisor - titled position that has assigned authority and responsibility for financials, production, maintenance, projects and personnel for a defined area. In Devon, this could be any supervisor, superintendent, foreman, or assistant foreman.

Person-in-Charge - a person that has been authorized by Devon to perform specific tasks to comply with this Devon protocol and/or regulatory requirements related to EHS. The PIC is defined in all protocols in the second column of the protocol section.

3.0	PROTOCOL	
3.1	Devon Leadership Commitment	
Step	Person In Charge	Action
3.1.1	Division/Business Unit Leadership	Participate in the development and implementation of emergency response and office emergency action plan(s), including, but not limited to, exercises and trainings.
3.1.2	Division/Business Unit Leadership/Emergency Management Leader	Assign an Emergency Management Liaison(s) for your given area of responsibility. Note: Area of responsibility may be assigned by area or division.
3.1.3	Emergency Management Liaison	Coordinate with Emergency Management and Public Affairs to maintain relationships with local emergency response agencies. Note: One way of maintaining relationships is to participate in your local emergency planning committee (LEPC).

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		Note: For process safety management (PSM) and/or Risk Management Plan (RMP) facilities, ensure all regulatory requirements pertaining to local emergency response agencies are fulfilled.
3.2	Emergency Response Plan	
Step	Person In Charge	Action
3.2.1	Emergency Management Liaison	Develop an emergency response plan that addresses area-specific unplanned events that could occur. Instructions for compiling the plan and a plan template are included in Appendix A . Note: The template will be used when implementing a written emergency response plan.
3.2.2	Emergency Management Liaison	Maintain the emergency response plan.
3.2.3	Emergency Management Liaison	Ensure the emergency response plan is available to employees and contract company representatives. A printed copy is required to be onsite at process safety management (PSM) facilities. The electronic master version should be housed on the IMT SharePoint site.
3.2.4	Emergency Management Professional	Schedule, develop, conduct and evaluate exercises of the emergency response plan annually to test the accuracy and the completeness of the plan in coordination with Emergency Management’s Incident Management Team (IMT) training. Note: Document exercises using forms as required by Homeland Security and make sure that all exercise coordinators receive a completed copy.
3.2.5	Emergency Management Professional	Audit the emergency response plan in conjunction with the annual exercise to ensure compliance.
3.2.6	Emergency Management Professional	Develop an Emergency Management After Action Report (Attachment B) to address gaps identified in the previous step.
3.2.7	Emergency Management Professional	Upload any corrective actions identified in the After Action Report in Shield as an emergency exercise assurance event and track the corrective actions to completion.
3.2.8	Emergency Management Liaison	Review and update the plan annually or as necessary to keep current with new or changing information. Note: Document the review in section 6.0 of the plan in the “Approval, Review and Modification History” table.
3.2.9	Emergency Management Liaison	Send the updated plan(s) to the Emergency Management Professional for posting to the IMT SharePoint site.

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3.3	Planning and Response Areas This is optional information unless required by a regulator for PSM facilities. Planning and response areas are geographical areas that surround a well, pipeline or facility containing hazardous product that requires specific emergency response planning. This information can be gathered and entered into a Site-Specific Response Plan, or an Emergency Planning and Response Zones illustration. These plans can also be developed outside of the regulatory requirements for an additional tool to the emergency response plan. This does not substitute for the emergency response plan itself.	
Step	Person In Charge	Action
3.3.1	Emergency Management Professional	Compile and document any information needed for handling emergency incidents. This may include: <ul style="list-style-type: none"> • Safe distances and places of refuge • Site topography • Site layout • Prevailing weather conditions • Population density • Access/egress routes • Directions/site access • Air monitoring sites • Notification flow charts • Shut-off valves • Muster points/staging areas • Latitude/longitude • Chemical product quantity manifest • Offsite consequence analysis (for PSM facilities only) • Security concerns • Emergency responder contact information <p>Note: These plans must be housed on the IMT SharePoint site.</p> <p>Note: A Site-Specific Response Plan Request Sheet to use for plan development may be accessed on the IMT SharePoint site.</p>
3.4	Incident Management Teams Devon's incident command system is based on the National Incident Management System guidance allowing Devon to manage coordinated responses and easily include all public and private stakeholders.	
Step	Person In Charge	Action
Corporate Incident Management Team - Responsible for all Calgary and Oklahoma City incidents, and can be called upon for support by the field teams if additional resources are needed.		
3.4.1	Emergency Management Leader/Division/Business Unit Leadership	Designate an employee(s) to be the incident commander who can be contacted on a 24-hour basis and is authorized to:

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		<ul style="list-style-type: none"> • Activate emergency response organizations or other response resources • Mobilize all necessary resources and equipment needed to respond to any incident • Provide delegation of authority
3.4.2	Emergency Management Leader/Incident Commander	<p>Identify personnel for positions in the incident management team organization consistent with the incident command structure shown in Appendix B.</p> <p>Note: Determine which personnel can be on call 24 hours a day, seven days a week. One person may fill more than one position.</p>
3.4.3	Emergency Management Leader	Ensure that correct notification numbers for the incident management team members are published on the incident management team SharePoint site.
3.4.4	Corporate Incident Management Team	Participate in emergency response plan trainings and exercises.
3.4.5	Emergency Management Leader	Develop and publish an Emergency Management After Action Report (Attachment B) from the exercise within 30 days of date of exercise.
3.4.6	Emergency Management Leader	Upload any corrective actions identified in the After Action Report in Shield as an emergency exercise assurance event and track the corrective actions to completion.
Field Incident Management Team - Responsible for all incidents within a respective area.		
3.4.7	Business Unit/Division Leadership/Emergency Management Professional	<p>Designate an employee(s) to be the incident commander who can be contacted on a 24-hour basis and is authorized to:</p> <ul style="list-style-type: none"> • Activate emergency response organizations or other response resources • Mobilize all necessary resources and equipment needed to respond to any incident • Provide delegation of authority
3.4.8	Designated Field IMT Incident Commander	<p>Identify personnel for positions in the incident management team organization consistent with the incident command structure shown in Appendix B. The completed incident command structure can be acquired by contacting Emergency Management.</p> <p>Note: Determine which personnel can be on call 24 hours a day, seven days a week. One person may fill more than one position.</p>
3.4.9	Emergency Management Professional	<p>Verify that if the field incident management team were unable to staff the minimum required functions, then the field has identified contract resources, mutual aid, or division support to perform them.</p> <p>Note: This should be addressed in the emergency response plan as part of the planning.</p> <p>Note: Only approved contractors may be used. Please review the Contractor EHS Protocol for more information on the process for evaluating, approving, auditing and monitoring contractors.</p>

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		Note: Each functional position should have a minimum of three persons identified.
3.4.10	Field Incident Management Team	Participate in the annual emergency response plan trainings and exercises facilitated by Emergency Management.
3.4.11	Emergency Management Professional	Develop and publish an Emergency Management After Action Report (Attachment B) from the exercise within 30 days of date of exercise.
3.4.12	Emergency Management Professional	Upload any corrective actions identified in the After Action Report in Shield as an emergency exercise assurance event and track the corrective actions to completion.
3.5	Office Emergency Action Plan Any office with 10 or more personnel assigned to it must maintain a written office emergency action plan in the workplace, and make it available to employees for review. This can be a part of the emergency response plan.	
Step	Person In Charge	Action
3.5.1	Field EHS	Develop a site-specific office emergency action plan for any office with 10 or more occupants. (The office emergency action plan is included in the emergency response plan document.) Note: A plan template is provided in Appendix A . This template will be used when implementing a written office emergency action plan. Note: The U.S. Facilities Department is responsible for developing plans for offices with either 50 or more occupants assigned to it, or a designated floor warden program. For offices with less than 50 occupants, but 10 or more, Field EHS is responsible for developing plans.
3.5.2	Building Floor Warden/Field EHS	Review the site-specific office emergency action plan with each occupant covered by the plan: <ul style="list-style-type: none"> • When the plan is developed • When the occupant is initially assigned to the office • When the occupant's responsibilities under the plan change • When the plan is changed
3.5.3	U.S. Facilities Department/Building Floor Warden	Ensure emergency/evacuation drills are scheduled and conducted annually, to test the accuracy and the completeness of the plan. During a drill, participants are expected to: <ul style="list-style-type: none"> • Follow directions given by the Building Floor Warden(s) and/or Floor Warden(s) • Treat the exercise as if it is a real emergency Note: Conduct, at a minimum, one fire drill annually. Additionally, conduct annual awareness communication on severe weather.
3.5.4	Field EHS	Upload any corrective actions identified in the After Action Report in Shield as an emergency exercise assurance event and track the corrective actions to completion. Include the following information:

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		<ul style="list-style-type: none"> • Area • Date • Exercise scenario • Objective • Exercise summary • What went well • What needs improvement • Corrective actions
3.6	Floor Warden Program	
Step	Person In Charge	Action
3.6.1	U.S. Facilities Department	Select floor wardens for each office/floor with 50 or more occupants, or in offices where Division/Business Unit Leadership has assigned a Floor Warden Program. Note: It is recommended that volunteers be sought to serve as floor wardens.
3.6.2	U.S. Facilities Department	Assign a building floor warden to coordinate emergency life safety activities for the entire building/office.
3.6.3	U.S. Facilities Department/Building Floor Warden	Assign a floor warden to be a back-up building floor warden when the building floor warden is unavailable.
3.6.4	U.S. Facilities Department/Building Floor Warden	Provide necessary equipment prior to assigning floor warden duties.
3.6.5	Floor Warden	Ensure floor warden duties are transferred when moving in or out of an office, and/or on or off a floor.
3.6.6	U.S. Facilities Department	Maintain an accurate list of floor wardens and their office location.
3.7	Employee Alarm System	
	An alarm system is required in offices with 10 or more personnel assigned. In offices with 10 or fewer personnel, a process for using voice communication for sounding an alarm, provided all employees can hear it, may be used.	
Step	Person In Charge	Action
3.7.1	Line Supervisor/Building or Floor Warden	Implement an employee alarm system in offices with 10 or more occupants to provide warning for safe evacuation from the workplace. Note: Alarm may be audible, visual, or both, as long as it can be perceived above ambient noise and/or light levels.
3.7.2	Line Supervisor/Building or Floor Warden	Develop a method for alarming personnel in offices with 10 or fewer occupants.



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		Note: Direct voice communication is acceptable.
3.7.3	Line Supervisor/Building or Floor Warden	Train each employee on the preferred means of reporting an emergency (e.g., manual pull box alarms, public address systems, radio, telephone, or person-to-person). Note: Display emergency telephone numbers near telephones or on employee notice boards, when telephones serve as a means of reporting emergencies.

4.0 RECORDKEEPING

Step	Person In Charge	Action
4.1	Employee	Forward records to Field EHS and Emergency Management for filing.
4.2	Emergency Management Liaison/Emergency Management Professional	File records as noted below:

Record	File Location & Number	Retention Time	Enterprise Classification Structure Code
Emergency Response Plan	See IMT SharePoint site Directory	EVT+5	EH80
Office Emergency Action Plan	See IMT SharePoint site Directory	EVT+5	EH80
Emergency Preparedness Exercise Documentation	See IMT SharePoint site Directory	EVT+5	EH80
Exercise After Action Report	See IMT SharePoint site Directory	EVT+5	EH80

EVT = Plan is superseded

Note: The Records Management Enterprise Classification Structure Code is listed as a reference, which should be used when records are sent to stored records.

5.0 TRAINING REQUIREMENTS

Step	Person In Charge	Action
5.1	Line Supervisor/ Emergency Management Professional	Verify all Devon employees and contract company representatives responsible for creating/maintaining emergency preparedness plans receive awareness training on this protocol.
5.2	Line Supervisor	Verify training has been completed by employees and contract company representatives with assigned emergency response field duties. Training may include:


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		<ul style="list-style-type: none"> • CPR • Emergency Action Planning and Response • Fire Safety • First Aid • Hazard Communication • IMT • Incident Reporting • Personal Protective Equipment (PPE) • Spill Prevention Control & Countermeasures
5.3	Emergency Management Professional	Ensure that personnel assigned to an incident management team receive incident command system training.
5.4	Emergency Management Professional	Verify that contractors assigned to the Devon IMT can provide documentation of required emergency preparedness training and any other training required for emergency response, when appropriate. Required documentation includes a Devon IMT training roster.
5.5	Emergency Management Professional/ Emergency Management Leader	Provide initial and annual refresher training for personnel assigned a position with an incident management team.
5.6	U.S. Facilities Department	Ensure all floor wardens receive necessary training as included in the Floor Warden Manual.
6.0	REFERENCES	
	<p>29 CFR 1910.120 - Hazardous Waste Operations and Emergency Response 29 CFR 1910.38 - Emergency Action Plans 29 CFR 1910.165 - Employee Alarm Systems NFPA 1600 - Standard on Disaster/Emergency Management and Business Continuity Programs NIMS - FEMA National Incident Management System HSEEP - Homeland Security Exercise and Evaluation Program</p>	

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Appendix A - Emergency Preparedness Plan Requirements and Structure

1.	Provide a table of contents at the front of the plan, including all applicable sections.
2.	List the name of the area(s) covered by the plan on the front cover.
3.	Include map of geographic area covered by the operating area.
4.	Document who the Emergency Management Liaison is for the area(s) covered by the plan.
5.	Include the following language in the introduction: Devon Energy makes every effort (through engineering, policy, training, etc.) to prevent emergencies from occurring; however, regardless of the efforts to prevent such events, a serious incident may occur. The primary goal of this plan is to prevent or minimize injury to employees and the public while reducing potential damage to the environment and property.
6.	<p>Include the incident management team(s) on the incident command structure (4.0 Organization and Assignment of Responsibilities) and provide an up-to-date roster of each position with contact numbers. This can be acquired by contacting Emergency Management or by accessing the Incident Management Team SharePoint site.</p> <p>Note: Link the appropriate corporate incident management teams for reference.</p>
7.	Include initial internal notification procedures.
8.	Include personnel roles and lines of authority for area(s) covered by the plan.
9.	List emergency response resources and contact information covered by the plan, equipment capabilities and maintenance requirements.
10.	Ensure that the potential resources required for support during an emergency are listed for company and contract response resources in the contact section of the emergency response plan.
11.	Provide a record of revisions to the emergency preparedness plan, including the date when each revision was made, and the type of revision (e.g., annual review, etc.). Also include where the master copy is located (IMT SharePoint) and if/where any hard copies are kept.
12.	Provide a concise set of easy-to-follow instructions (Annexes). Include the appropriate emergency response procedures, and for offices with 10 or more occupants, the office emergency action procedures.
13.	Develop and include procedures to be followed by employees who remain to perform critical operations before they evacuate.
14.	Develop and provide procedures for reporting emergency incident notifications to local, state and federal government, and/or regulatory agencies. A notification table template is included in the Emergency Response and Office Emergency Action Plan Template. This template will be used when developing contact procedures for emergency response.
15.	Include facility/site information, location, any applicable maps, and other appropriate information. For facilities with alarm systems include information on the purpose and meaning of the alarms, as well as methods of training.

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16.	Include emergency evacuation routes and procedures, muster areas, and procedures for accountability of employees for office locations. Note: Life Safety and Emergency Egress Maps may be used to meet this requirement.
17.	Facilities with assigned medical and rescue personnel must include response procedures in plan.

TEMPLATE (for Plans)

The hyperlink listed below is the Emergency Response and Office Emergency Action Plan template that is to be used for formatting when developing plans.

Emergency Response and Office Emergency Action Plan Template



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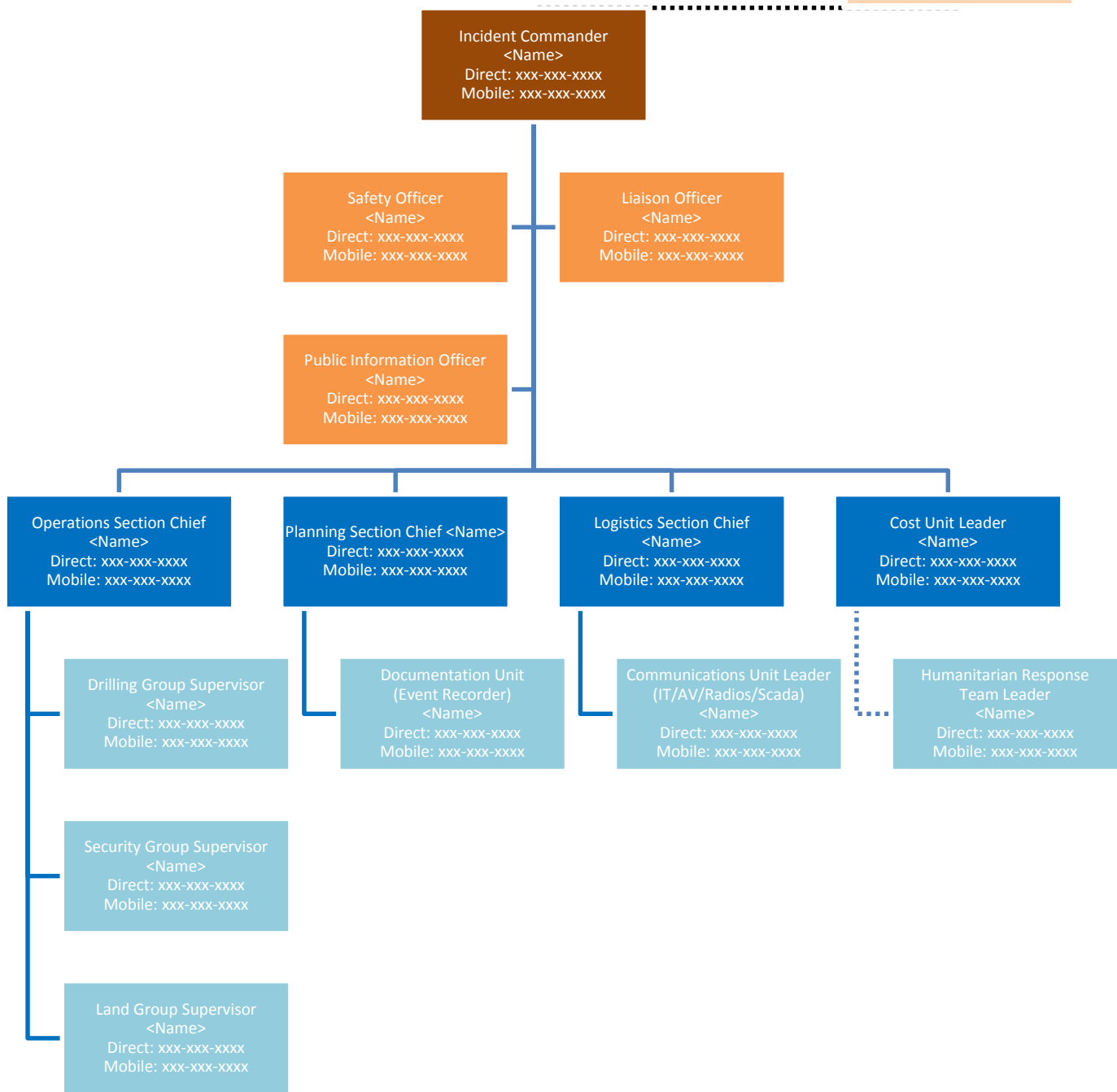
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Appendix B - Incident Command Structure


Business Unit Management
<Name>
Direct: xxx-xxx-xxxx
Mobile: xxx-xxx-xxxx



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Attachment A - Approval, Review and Modification History

Revision Number	Approved/Revised/Reviewed By	Approval/Revision/ Review Date	Description (Initial Approval, Revision or Review along with further details of revision if needed)
00	Richard Luedecke	2-25-16	Initial Approval

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Attachment B - Emergency Management After Action Report

The hyperlink listed below is the After Action Report that is to be used by Emergency Management when conducting the exercises.

Emergency Management After Action Report