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Spill Prevention Countermeasure and Control (SPCC) Protocol					

Purpose

This Devon Energy Protocol establishes workflow and document flow for complying with the Environmental Protection Agency (EPA)'s Oil Spill Pollution Prevention, Countermeasure and Control (SPCC) regulation (40 CFR, Part 112) and related company policies.

Scope


This protocol applies to oil handling equipment/facilities, oil-filled equipment (including transformers) and oil handling employees (produced water tanks have the potential to be considered oil handling equipment, if the contents will produce a sheen on water if released). Contractors subject to SPCC regulation are expected to meet or exceed the requirements in this protocol.

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1.0 **RESPONSIBILITIES** - The responsibilities of Devon personnel are detailed in the RACI diagram below. The RACI diagram details who is responsible, accountable, consulted and informed about SPCC compliance tasks and activities.

SPCC RACI MATRIX		EHS						Operations				Projects	
Section	Work Activities	Envr Manager	Regional Envr Supervisor	Local Envr Field Professional	EHS Training/LMS	Envr Consultant	SPCC Program Coordinator	Area Manager	Superintendent	Construction Foreman	Production Foreman	Project Manager	Project Engineer
5.0.1	Post list of "triggering events" and "points of contact"	R & A	C	I			C	I	I	I	I	I	
5.0.2	Establish and maintain training program	C	C	R	R		A	I	I	I	I	I	I
3.1.1	Notify EHS of "triggering" projects			I								A	R
3.1.2	Notify EHS of "triggering" changes in operations			I				R	R	A			
3.1.3	Applicability screening & communication of requirements		A	R		C	C	I	I	I	I	I	I
3.2.1	Construction & start-up notification (Projects)			I				R		I	A	R	
3.2.2	Construction & start-up notification (Op Changes)			I			A	R	R	R			
3.3.1	Site visit, "as-built" info gathering, & compliance check		I	A		R		I	I	I			I
3.4.1	Draft all required compliance documents	C	A	R		R	C			C	C	C	C
3.4.2	QA/QC review of compliance documents		A	R		R	C			C	C		C
3.4.3	Sign/authorize compliance documents (as required)		C					R & A		C	C		C
3.4.4	Authorize and direct Spill/Response Contractor			C & I				R		R & A			
3.4.5	File and distribute compliance documents		A	R			C				I		I
3.5.1	Communicate site/project specific work requirements		A	R			C			I	I		I
3.5.2	Enter Operating Staff work assignments (inspections) into SAP								R		R & A		
3.5.3	Enter Environmental Staff work assignments (training) into ACTS		A	R									
3.5.4 & 3.5.5	Establish Operational Alarms in TOW, Cygnet, or equivalent when necessary and required										R & A		R
Responsible - Those who do the work to achieve the task. There is at least one role with a participation type of responsible, although others can be delegated to assist in the work required.											R Responsible		
Accountable (also approver or final approving authority) - The one ultimately answerable for the correct and thorough completion of the deliverable or task, and the one who delegates the work to those responsible. In other words, an accountable must sign off (approve) on work that responsible provides. There must be only one accountable specified for each task or deliverable.											A Accountable		
											C Consulted		
Consulted (sometimes counsel) - Those whose opinions are sought, typically subject matter experts; and with whom there is two-way communication.											I Informed		
Informed - Those who are kept up-to-date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication.													

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2.0 TERMS AND DEFINITIONS

NOTE: Unless otherwise noted below, all terms will be as defined at 40 CFR 112.2, and the *SPCC Guidance for Regional Inspectors* located at: http://www.epa.gov/emergencies/content/spcc/spcc_guidance.htm

Environmental Point-of-Contact (ENV POC) - EHS personnel tasked with providing environmental oversight, communication and management responsibilities for an assigned production areas. A complete ENV POC list can be found on Strata, search "single point of contact list."

Person-in-Charge (PIC) - 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.

Reasonable Inquiry - Review process by a company representative including inquiry of the person responsible for preparation that ensures with reasonable certainty that the document is accurate and complete.

Spill Prevention, Control and Countermeasure (SPCC) Plan, or Plan - The document required by 40 CFR §112.3 that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge.

Substantial Deviation - A deviation that may result in a notice of non-conformance or violation in an SPCC compliance audit/inspection including, but not limited to:

- Oil handling employees not having SPCC training
- Facility SPCC applicable equipment deviations from SPCC design diagrams
- Unreported/undocumented spills
- SPCC applicable equipment not receiving routine integrity inspections
- Not conducting/documenting annual inspections for SPCC applicable equipment
- Not conducting/documenting 5 year complete SPCC plan reviews

Technical Amendment - A change in the facility design, construction, operation, or maintenance that affects its potential for a discharge (For additional informational on Technical Amendments see 49 CFR 112.1(b)).

Triggering Event - activity that initiates one or more environmental permitting, equipment control, operational control, monitoring, reporting, training, or other environmental control requirements. Triggering events (e-triggers) can be found on STRATA, search "environmental triggers."



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3.0	PROTOCOL	
3.1	Applicability Screening & Communication of Requirements	
Step	Person In Charge (PIC)	Action
3.1.1	Environmental Manager	<p>Maintain a posting of triggering events and a current listing of Environmental Point-of-Contact within the EHS page on Strata.</p> <ul style="list-style-type: none"> The triggering events listing will identify the types of equipment and/or operational projects/changes that are subject to SPCC regulation and require action. The Environmental Point-of-Contact listing will identify, by name and title, the environmental staff person who is designated as the primary and initial point of contact for each operating area, and for each project area. <p>Substantial revisions/additions to these lists will be communicated by email from the Environmental Manager to all affected personnel or by Strata Announcement/Alert.</p>
3.1.2	Production Foreman	<p>Ensure within 30 days of start-up of projects involving a triggering event, the Environmental Point-of-Contact is informed of the project scope and timing (email, phone message, inclusion in distribution of project list, or equivalent). See SPCC Plan Development Timeline for additional information (Appendix B).</p>
3.1.3	Production Foreman	<p>Ensure within 30 days of funding/approval for operational and/or equipment changes involving a triggering event the Environmental Point-of-Contact is informed of the scope and timing of the change (email, phone message, inclusion in distribution of project list, or equivalent).</p>
3.1.4	Local Environmental Field Professional	<p>Initiate an applicability determination as outlined in the SPCC Work Instruction (Appendix A) and communicate the results.</p> <ul style="list-style-type: none"> In circumstances where SPCC requirements are applicable, inform affected project and operations staff by email and attach a copy of the SPCC Plan Compliance Summary (Appendix C). In circumstances where SPCC requirements are not applicable, inform operations and/or project staff that an SPCC Plan will not be required.
3.2	Site/Equipment Construction and Start-up Notification	
3.2.1	Construction Foreman	<p>Ensure the location/facility is constructed with all equipment specified in the SPCC Plan Compliance Summary (Appendix C) that was provided by the local environmental field professional; and inform the local environmental field professional of completion no later than 30 days after construction.</p>
3.2.2	Production Foreman	<p>Ensure the operational/equipment change is completed/constructed with all equipment specified in the SPCC Plan Compliance Summary (Appendix C) that was provided by the local environmental field professional. Inform the local environmental field professional of completion no later than 30 days after initiating production.</p>



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3.3 Compliance Validation & Information Gathering		
Step	Person In Charge (PIC)	Action
3.3.1	Local Environmental Field Professional	<p>Complete a site visit to the location no later than 90 days after start-up (See SPCC Plan Development Timeline for additional information - Appendix B):</p> <ol style="list-style-type: none"> 1. Gather all as-built information, including measurements, tanks sizes, plot plan & configuration sketches, and pictures that will be needed to prepare the SPCC Plan. 2. Evaluate the as-built equipment and validate SPCC compliance. <p>Note: To the extent substantial deviation from the SPCC Plan Compliance Summary (Appendix C) is identified, inform the production foreman, develop a corrective action plan, and enter it into incident reporting system as a start-up review event.</p>
3.4 Prepare and Finalize Required Compliance Documents		
Step	Person In Charge (PIC)	Action
3.4.1	Local Environmental Field Professional	<p>Identify and prepare all required compliance documents as directed in the SPCC Work Instruction (Appendix A) within 120 days of the start-up (See SPCC Plan Development Timeline for additional information - Appendix B):</p> <ul style="list-style-type: none"> • Documents that require signature by an Authorized Individual will be forwarded to the Regional Environmental Supervisor for handling. • Following QA/QC review, documents that do not require signature will be filed at the local field office (in the SPCC Plan); and an electronic copy will be saved to ACTS.
3.4.2	Regional Environmental Supervisor	<p>Establish and maintain a process that ensures all draft SPCC compliance documents prepared by consultants are reviewed for content and accuracy by a person other than the preparer, who is competent and experienced in Oil & Gas SPCC Compliance. Personally spot check the quality of draft documents to ensure effectiveness of the review process.</p>
3.4.3	Regional Environmental Supervisor / Local Environmental Field Professional	<p>Review the SPCC Plan when technical amendments are made to the SPCC Plan Compliance Summary (Appendix C) with the Area Operations Manager and present the final compliance documents (SPCC Plan) to the Area Operations Manager for signature.</p> <p>Note: Signature represents certification of compliance and authorizes allocation of specified resources. DO NOT SIGN until/unless you have reviewed and understand the SPCC Compliance Summary and have completed reasonable inquiry into the accuracy and completeness of the plan.</p>
3.4.4	Area Operations Manager	Sign all SPCC Plans.
3.4.5	Production Foreman	Complete the following steps once the SPCC Plan is signed:



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		<ol style="list-style-type: none"> 1. Evaluate local (preferably, less than one hour response time to potentially affected water bodies) spill response & clean-up contractors, and select a primary and secondary that have adequate response equipment and trained personnel (consult with local environmental field professional when making this selection). 2. Ensure the selected contractors are maintained on the approved vendors list. 3. Ensure any/all necessary contracts and agreements with the contractor are in place and active.
3.4.6	Local Environmental Field Professional	Document as part of the SPCC Plan, all primary and secondary oil spill response contractors.
3.4.7	Local Field Environmental Professional	Within 30 days of signature, ensure final, signed SPCC documents are filed at the local field office; and, an electronic copy is saved to ACTS. See SPCC Plan Development Timeline for additional information - Appendix B.
3.5	SPCC Compliance Management	
Step	Person In Charge (PIC)	Action
3.5.1	Production Foreman	Enter recurring Operating Staff SPCC compliance work assignments, such as annual inspections and corrective actions, into SAP (maintenance tasks) - these can be found in the Compliance Summary and/or in direct communications from the local environmental field professional.
3.5.2	Local Environmental Field Professional	Enter new/revised Environmental Staff SPCC work assignments (e.g., training and annual reviews) into ACTS.
3.5.3	Production Foreman	Ensure overfill prevention equipment/controls are installed sufficient to prevent overfill according to the SPCC compliance summary (Appendix C).
3.5.4	Production Foreman	If high-level sensors and alarms are installed as overfill controls, ensure communication in SCADA, Cygnet, or equivalent is enabled and used as overfill high level alarm.
4.0	RECORDKEEPING	
Step	Person In Charge (PIC)	Action
4.0.1	Local Field Environmental Professional	<p>All records associated with SPCC compliance will be maintained per the Devon Management of Records Policy.</p> <ul style="list-style-type: none"> • The original, signed SPCC Plan and all hard copy original records related to SPCC Plans will be filed at the local field office by the local environmental field professional. • An electronic copy of the SPCC Plan will be maintained on ACTS by the local environmental field professional.
4.0.2	Production Foreman	All records associated with SPCC compliance will be maintained per the Devon Management of Records Policy.

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		Copies of required SPCC inspections and corrective actions will be maintained in SAP (or equivalent) by the production foreman, and will be made available for inspection upon request.
5.0 TRAINING REQUIREMENTS		
Step	Person In Charge (PIC)	Action
5.0.1	SPCC Program Coordinator	Develop, implement and maintain an SPCC training and briefing program to be implemented through the Devon Learning Management System (LMS). The SPCC training program and briefing program will fully comply with the requirements of 40 CFR 112.7(f)(1) and will be assigned to all personnel involved in designing, constructing and/or operating oil handling or storage equipment.
5.0.2	Local Environmental Field Professional	Conduct an annual spill response training and an annual SPCC briefing, using the company SPCC training materials (Appendix D) and track records of training content and attendance. Training records will be maintained with the SPCC Plan at the local field office.

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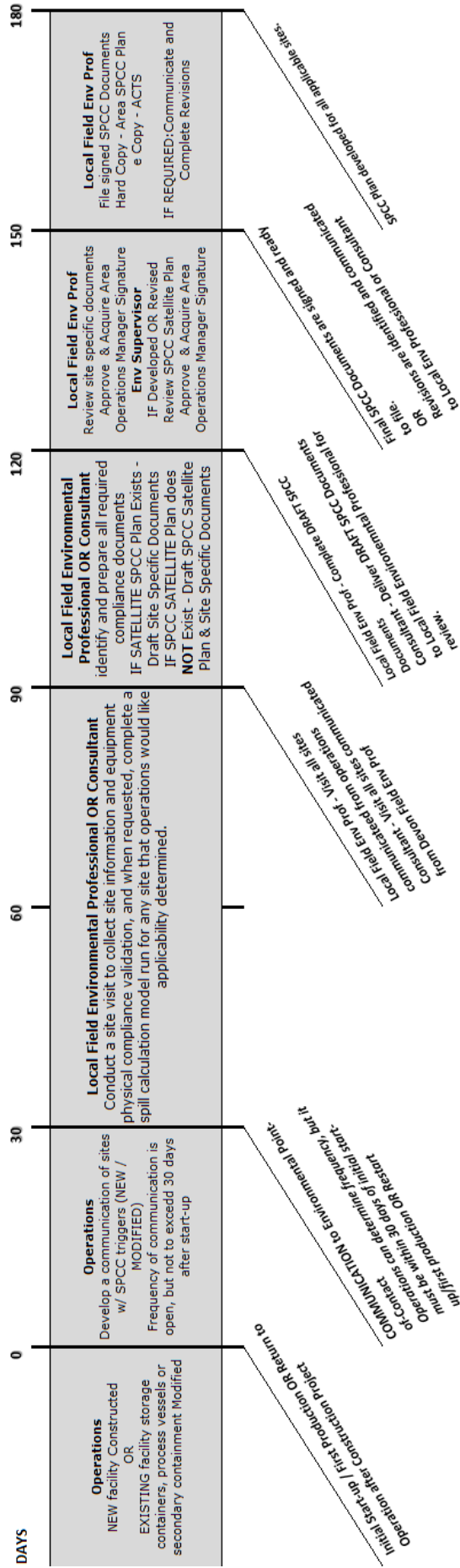
Appendix A

SPCC Compliance
Work Instruction

LINK:

[SPCC Compliance - Work Instruction](#)

Appendix B SPCC Timeline





Appendix C
SPCC Compliance Summary

SPCC COMPLIANCE SUMMARY
North End Zone Area, Oklahoma
September 25th 2014

OPERATING LIMITATIONS & REQUIREMENTS:

RESPONSIBLE PARY	EQUIPMENT	DESCRIPTION OF CONSTRAINT	LIMIT
Production Foreman	All oil containing tanks, equipment, and lines	Promptly remove or initiate actions to stabilize and remediate any accumulation of oil discharges.	All discharges of oil to waters of the U.S. are prohibited
Lease Operator	Containment Areas	Do not release or discharge accumulated rainwater to the surface until/unless the water has been inspected and the discharge from has been completed and signed (form is located in the SPCC Plan).	No oil or other contaminants may be released

EQUIPMENT REQUIREMENTS:

RESPONSIBLE PARTY	EQUIPMENT*	REQUIREMENT	TIMING
Production Foreman	Oil Storage Tanks of 55 gallons or larger (including water tanks having any accumulation of oil)	Secondary containment sufficient to contain a spill from the largest tank/container plus rainfall from a 25-year event. Containment must be constructed to retain spills until clean-up can be completed.	At start-up
Production Foreman	Oil-filled equipment, including flow lines, and transfer areas	A system of sumps, dykes, berms, trenches, sorbent materials, retention areas, etc. sufficient to retain a typical oil spill on location until clean-up can be completed.	At start-up
Superintendent	Oil-filled tanks and process equipment	Sufficient spill response equipment (sorbent materials, boom, weirs, pump trucks, earth moving equipment, skimmers, etc.) and trained personnel must be available to immediately contain and remediate oil spills (this is generally accomplished by contracting a local spill response company).	At start-up

*NOTE: Do not change out or add oil-filled equipment tanks without contacting Environmental Rep

MAINTENANCE & INSPECTION REQUIREMENTS:

RESPONSIBLE PARTY	EQUIPMENT	REQUIREMENT	TIMING
Lease Operator	Tanks and Oil-filled Equipment, including flow lines	Visually evaluate location for any indication of leaking oil, and immediately report any findings to the Production Foreman.	During each route
Production Foreman	Tanks and Oil-filled Equipment, including flow lines	Complete "Annual SPCC Compliance Inspection". A checklist must be completed and filed for each location; along with documented corrective actions for any deviations. (The checklist is specified and certified by the PE in the SPCC Plan)	Every Calendar Year

NOTE: Refer to recordkeeping section for related documentation requirements.

TESTING/MONITORING/SAMPLING REQUIREMENTS:

RESPONSIBLE PARTY	EQUIPMENT	REQUIREMENT	TIMING
Production Foreman	Oil Storage Tanks of 55 gallons or larger (including water tanks having any accumulation of oil)	Must have one or more of the following to prevent overflow: <ul style="list-style-type: none"> - Adequate capacity to prevent overflow if pumper is delayed - Equalizing lines - Vacuum protection, and/or - High-level sensors and alarms sufficient to prevent overflow. 	At start-up

NOTIFICATION & REPORTING REQUIREMENTS:


RESPONSIBLE PARTY	EQUIPMENT	REQUIREMENT	TIMING
Field Environmental Professional	Any/all oil-containing equipment	Agency notification of oil spills that reach navigable waters of the U.S.	Immediate

TRAINING REQUIREMENTS:

RESPONSIBLE PARTY	AUDIENCE	REQUIREMENT	TIMING
SPCC Program Coordinator	All oil-handling personnel (including personnel involved in design/construction of oil-handling equipment)	Complete initial SPCC Compliance Training as assigned in the Learning Management System.	One-Time (within 6-months)
Field Environmental Professional	All oil-handling personnel within the regulated production area	Annual SPCC briefing and area-specific spill response training. NOTE: To the extent facility personnel will be involved in cleaning up, or directing others on the clean-up of regulated materials, training must ensure compliance with 29 CFR 1910 HAZWOPER as applicable	Annual

RECORDKEEPING REQUIREMENTS:

RESPONSIBLE PARTY	EQUIPMENT	REQUIRED RECORD	LOCATION
Field Environmental Professional	All equipment within regulated production area	Final, signed SPCC Plan and training records	Field Office
Production Foreman	All equipment within regulated production area	Annual Inspection (and corrective action completion records)	SAP (or hard copy at Field Office)
Lease Operator	Regulated containment areas	Rainwater release/discharge to surface forms (required only when/if rainwater released from containment to surface).	Field Office
Field Environmental Professional	All regulated sites	Coordinate and complete annual review/revision of the SPCC Plan, and ensure re-certification every fifth year.	Field Office

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Attachment B

LINK - SPCC Plan Template
[SPCC Plan Template](#)