

SAFETY & EMERGENCY RESPONSE

DOUBLE H DRILLING LLC
REVISION 4

Company Information

Double H Drilling LLC

103 Buckhorn Drive

Waverly, MO 64096

940-366-9295

doublehdrilling@gmail.com

Prepared by: David Burrow | 12/25

COVID-19 Documentation

Please note: Due to the Coronavirus Pandemic we are under strict guidelines. Please find at the end of this PSP the following documents:

- LEB COVID-19 Exposure Prevention, Preparedness, and Response Plan REV1
- Double H Drilling LLC Document: COVID-19 Pandemic Protocols
- Double H Drilling LLC Document: COVID-19 Site Access Health Assessment (Fillable Form)
- Double H Drilling LLC Document: Mandatory Face Covering Protocol
- Double H Drilling LLC Document: COVID-19 Temperature Guidance

Contents

HSE Training and Incident Management 5

2. Health and Safety 8

3. Emergency Action Plan Requirements 19

4 Oil Pollution and Response 22

5 Waste Management Plan 22

6. Security and Control 25

7. Foreign Pipeline Incident Plan 25

8. Refueling Procedure 30

9. Excavations 31

10. Hot Work 33

11 Location Markings 34

12. Erosion Control 34

Double H Drilling LLC COVID-19 Exposure Prevention, Preparedness, and Response Plan . . 35

23.0 Personal Conduct - Worker Violence 51

24.0 Personal Conduct - Substance Abuse 53

25.0 Personal Conduct - Fatigue Management 54

26.0 Personal Conduct - Fit For Duty 55

27.0 Personal Conduct - Medical Clearance 56

28.0 Personal Conduct - Smoking / Tobacco Policy 56

29.0 Personal Conduct - Progressive Discipline 56

30.0 Personal Conduct - Short Service Employees 57

31.0 Radiographic Operations (Gamma Ray or X-Ray) 58

32.0 Slips & Trips, Sprains & Strains - Safe Lifting Program 58

33.0 Traffic / Equipment Hazard - Heavy Equipment 59

34.0 Utility Hazards - Working Near Power Lines 59

35.0 Driver Safety Program (on/off road, ATV) 61

36.0 Working Alone - Travel Planning Program 66

37.0 Working Alone - Self Rescue Program 67

38.0 Working Alone - Call-in Procedure 69

39.0 H2S Hydrogen Sulfide Safety Program 70

40.0 Emergency Response Plan 70

41.0 Project Hand Protection Specification 71

42.0 Housekeeping 74

43.0 Self Inspection / Audit 74

44.0 Lockout /Tagout Safety 75

45.0 Subcontractor and Third-Party Personnel Management Plan 83

46.0 Pandemic Preparedness -Safety & Response 91

47.0 Incident Investigation 92

Contents (Continued)

48.0 Work Area Illumination and Pre-Entry Inspection 94

49.0 Assured Equipment Grounding Conductor Program 98

50.0 Case Management and Return-to-Work Policy and Procedure 100

51.0 Industrial Hygiene and Occupational Health 103

52.0 Short Service Employee - Green Hard Hat Identification 106

53.0 Process Safety Management (PSM) Policy 107

54.0 Craft Skills Training Program and Policy 109

55.0 Cybersecurity and Information Security Policy 111

HSE Training and Incident Management

1.1 HSE ORIENTATION TRAINING

- All Double H Drilling LLC employees and subcontractors shall receive Orientation HSE Training on this and other pertinent plans.
- Any new employees will be required to receive training prior to beginning work.
- All Double H Drilling LLC and affiliated subcontractors shall view the Contractor Safety Orientation prior to any work activities.
- Employees who may be exposed to bodily fluids must be trained on bloodborne pathogens when they start their job and every year thereafter. If this applies to you You'll be contacted by David Burrow.

1.2 TAIL GATE HSE MEETINGS

- Tail Gate HSE meetings shall be held at the beginning of each shift by each Crew Foreman to discuss the current day's tasks, relevant JSAs, and the previous day's issues.
- All meetings must be documented and signed by all employees.

1.3 JOB SAFETY ANALYSIS (JSA) MEETINGS

- Job Safety Analysis sheets (JSAs) have been developed to assist in the identification and preparation for specific job hazards.
- These must be completed daily and are the foundation for the tailgate meeting. All hazards must be identified specific to the scope of work and tasks expected to be performed.
- If conditions or tasks change during the work shift, a new JSA must be executed. A tailgate meeting to discuss the change will be held.
- High-hazard tasks that arise may require a separate JSA and meeting.
- For specific job hazards that do not have a JSA, one must be written.
- All parties must review the new JSAs before commencing work.
- All JSAs must be kept on file at the work location.
- Additional JSAs will be added as they are developed.

1.4 COMMUNICATION EQUIPMENT

Communication between personnel, crews and offices will be handled by several methods, i.e., company radio, cell phones, land lines.

.

Cell Phones

The Superintendent, Foreman, Project Safety Director, and Client Inspectors have cell phones and other devices to communicate their normal and emergency needs.

Land Phone Lines

The Double H Drilling LLC Office can communicate via the land phone line to the Double H Drilling LLC Superintendent, Foreman, and any other emergency agency as emergencies arise.

1.5 NO COMMUNICATIONS

- In the event that the pipe repair operations have a problem that could affect a pipeline or a potential spill or leak and communications are broken for some reason, at that time, Superintendent/Foremen shall stop any work until the crew responds to their needs and communications are reestablished.
- Work shall also stop if:
- Critical changes in operations need to be addressed
- Foreman have reached the end of the cleared work
- There is an emergency, such as the discovery of a foreign pipeline where the line is only lifted but not damaged, or damaged in some way or ruptured.
- Work shall not start until communications are re-established.

1.6 INCIDENT MANAGEMENT PLAN

In the event of an HSE incident such as a fatality, OSHA Recordable or Reportable injury, first aid injury, fire, explosion, oil or chemical spill, property damage, Near Miss, etc. the following procedure must be followed:

In most locations we will be relying on the training we provide our foreman's and crew leaders to render first aide. Each crew will be provided adequate training and materials to react to any type of occupational hazard. This training will be held once a year and is provided by Andy Hostetter (660-641-7185). Double H Drilling LLC will ensure the availability of adequate first aid supplies, and periodically reassess the demand for

supplies and adjust their inventories. For construction operations, first aid kits shall be checked before being sent out to each job and at least weekly.

- Immediately stop all activities related to the incident.
- Call for assistance.
- Provide the necessary assistance to anyone affected by the incident.
- Isolate and secure the incident scene, in case of fatality and / or hospitalization.
- Notify, as soon as possible, the person in charge (Client).
- The person in charge (client) makes required notifications in accordance with reporting requirements.
- Notify the Safety Director immediately. (940) 366-9295
- Notify Andy Hostetter as soon as possible. 660-641-7185
- Reporting of all incidents will be done as soon as possible but not more than eight (8) hours after occurrence.
- An incident report form must be submitted to both Double H Drilling LLC and the client representative as soon as possible after occurrence, but not more than 24 hours.
- A formal incident investigation will be conducted for all injuries, environmental incidents, and serious near misses.
- The incident investigation team will be led by the Double H Drilling LLC Safety Director and client representative.
- Additional members of the investigation team will include Contractor Safety Coordinator and other selected project team members.

1.7 EMERGENCY CONTACT LIST

- Emergency notifications will be in accordance Client Policies.
- The employee observing the incident will report all incidents to their immediate supervisor or the designated person in charge.
- All internal notifications beyond the onsite notifications will only be by the Gas Company Inspector and Client Representative or Double H Drilling LLC management.
- The Superintendent will only make notifications approved through the Client Representative.

2. Health and Safety

2.1 FIRST AID / CPR / MEDICAL SERVICES

A person who has a valid certificate in first-aid training from the American Red Cross or equivalent that can be verified by documentary evidence, shall be available at the worksite to render first aid. Crews are required to have at least one person trained in First Aid/CPR. Emergency information such as phone numbers, location, and maps to emergency services are to be discussed and posted at the jobsite. Every vehicle on the job-site will be equipped with both a first aide kit and eye wash station. Each piece of equipment will also contain both.

EXPOSURE PLAN (Located in Employee Manual & all Company Vehicles)

Employee’s may come into contact with foreign bodily fluids while performing duties at work. This could include, but is not limited to blood saliva and mucus. If you knowingly are exposed to any bodily fluids call David Burrow. All bodily fluids should be considered infectious. Universal precautions involves the use of PPE and sanitary procedures (such as hand washing and cleaning work surfaces) to limit potential for exposure. Hand washing stations and/or sanitary wipes will be available at every “porta-john.” If at any time you are to be exposed to a bodily fluid please use the kits located in company vehicles which include gowns, masks, gloves, etc. All equipment and surfaces must be cleaned if they come into contact with blood or other infectious material. The Hepatitis B vaccine will be made available to all employees that have occupational exposure at no cost to the employee(s).

2.2 EACH JOB SITE (BY CREW) WILL BE REQUIRED TO HAVE TRAINED PERSONNEL IN FIRST AID AND CPR.

Project Safety Director will be onsite as needed to assist in maintaining a safe work place and tend to medical incidents.

Employees performing electrical work shall be trained in electrical safety-related work practices that pertain to their respective job assignments. All employees shall be trained in any electrically related safety practices which are necessary for their safety. Only qualified persons may work on electric circuit parts or equipment that have not been deenergized. Such persons shall be capable of working safely on energized circuits and shall be familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools.

3.1 DRIVER SAFETY

Double H Drilling LLC requires that all company drivers must have a current, valid, state issued driver’s license with the proper endorsements of the vehicles they operate. Double H Drilling LLC employees operating motor vehicles are forbidden from operating a motor vehicle while under the influence of drugs or alcohol. The operating of a motor vehicle under the influence of alcohol with a blood alcohol level above the local legal limit, under the influence of illegal drugs, and the operating of a motor vehicle under the influence of prescription medication that can cause impairment or drowsiness is forbidden. Double H Drilling LLC requires that company employees taking prescription medication that can impair their ability to safely operate a motor vehicle, be required to inform their supervisor. Double H Drilling LLC requires that all motor vehicle incidents while on company business must be reported immediately to the involved employee’s supervisor(s) and when applicable law enforcement as well as Double H Drilling LLC’s insurance company.

Company policy requires that all cargo transported on or in motor vehicles must be stored properly to prevent unintended movement and secured. It also requires each division to perform adequate maintenance on company motor vehicles to ensure their safe operations in accordance with the recommendations of the manufacturer. We also require that operators of company motor vehicles must conduct a pre-use inspection prior to operating the vehicle. The pre-use inspection must include a walkaround inspection of the vehicle to check for obvious defects and that there are no obstacles in the path of travel for the vehicle. These pre trip checks will be done and turned in weekly. Double H Drilling LLC proudly requires and enforces all drivers and passengers to wear seatbelts while the motor vehicle is in operation. We also ask all our drivers to obey all traffic laws and follow the common rules of the road when operating a motor vehicle on company business.

4.3 PERSONAL PROTECTIVE EQUIPMENT (PPE)

4.4 LISTED BELOW IS THE SPECIFIC PROTECTIVE EQUIPMENT FOR EACH LEVEL OF PROTECTION. (NO CHANGES TO THESE SPECIFIED LEVELS ARE TO BE MADE WITHOUT APPROVAL OF THE Double H Drilling LLC PROJECT SAFETY DIRECTOR).

LEVEL A (Does Not Apply)

- SCBA/ Supplied Air
- Chemical Protective Suit
- Gloves

- Safety Toe Footwear
- Hearing Protection
- Voice Communication Device
- Monitors (LEL, O2)

LEVEL C

- Respirator (1/2 APR)
- Splash Suit W/ coveralls
- Gloves
- Safety Toe Footwear
- Goggles
- Hard Hat
- Hearing Protection
- Hot Work Monitoring

LEVEL B (Not expected)

- SCBA/ Supplied Air
- Splash Suit/ FR Coveralls
- Gloves
- Safety Toe Footwear
- Hearing Protection
- Voice Communication Device
- Monitors (LEL, O2)
- Hard Hat

LEVEL D

- Gloves
- Safety Toe Footwear
- Safety glasses / Face Shields
- Hard Hat

- Hearing Protection
- Normal work clothes
- Kevlar chaps
- Hot Work Monitoring
- Two-gas monitors will be used for Hot Work Permit preparation.
- As a minimum, O2 and LEL will be monitored during permit activities.
- In cases where standing gasoline or residual gasoline exists, benzene monitoring may be required. Consult the Safety Department on these specific instances.

Personal Floatation Devices

- A Personal floatation device is required when working within 10 feet of water.
- The device should be adult rated in excess of 130 pounds and be of design to keep a person’s face clear of water should he or she become incapacitated.
- Minimum levels of protection required for certain job function.
- Coating - Level C & D
- Training must be given to employees about when to wear PPE, what PPE should be worn, how to put on and take off and adjust PPE. The limitations of the PPE and its use, care, and maintenance should also be included in the training. PPE training should be documented. The certification should include the employee name, the dates of training, and the training content. Each affected employee must demonstrate an understanding of training received and the ability to use PPE properly. When there is a reason to believe that any employee who has been trained does not have the required understanding and skill or there are changes in the workplace, the employee must be retrained. The level of protection may be increased or decreased depending upon the prevailing work environment. As a minimum, all Double H Drilling LLC and subcontractors will wear appropriate PPE as described:
- Hard Hats
- Safety Glasses
- Safety - Toed Boots
- Leather gloves
- Normal work clothing
- Reflective apparel while working near roadways

- Kevlar chaps while operating chainsaws.
- FR clothing as needed depending upon local situations.

Hearing Protection

- All areas are marked with signs where a high noise level exists. Examples: Sandblasting and Jack hammering.
- When working in those areas, hearing protection will be required.
- A particular high-noise incident often incurred on pipeline projects is nitrogen blow-down, which can exceed 120 Db. For nitrogen blow-down, we will restrict the number of employees monitoring the blow-down valves to two (2); those employees must wear both earplugs and ear muffs and must rotate as follows: Zero to twenty-four 2” vents OR blowing down through a frac tank every 15 minutes Twenty-four or more 2” vents with no frac tank every 10 minutes. If an employee is exposed to noise that is 85 dBA or louder on an eight hour time weighted average (TWA), then that employee must be in a hearing conservation program. Noise measuring must be done to see if employees are being exposed to noise that is 85 dBA or louder on an eight hour time weighted average (TWA). This measuring can be either sampling performed when needed or monitoring performed all the time. Employees who are exposed to noise that is 85 dBA or louder on an eight hour time weighted average (TWA) must have hearing tests (also called "audiograms" or "audiometric testing") available to them.

  These tests help by showing any hearing loss that might be happening and must be done every year after the baseline test. A baseline, or initial, hearing test must be done within six months if an employee has been exposed to noise that is 85 dBA or louder on an eight hour time weighted average (TWA). Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. If your company uses a mobile testing van for hearing tests, the baseline can be established within one year. Each employee's annual hearing test must be compared to the same employee's original baseline test. This is to see if a significant change, called a "standard threshold shift", has happened. If a standard threshold shift has happened, the employee who has had the standard threshold shift must be told in writing within 21 days of the test results coming out. Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, the employer shall ensure that employees already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary.

The employee shall be referred for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if the employer suspects that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors. Hearing protection will be provided at no cost to employee(s). It shall be replaced as necessary. Employers shall ensure that hearing protectors are worn. Each superintendent will be evaluating hearing protection for the specific noise environments in which the protector will be used. Training on the hearing conservation program must be given to employees at least one time every year. The training must be updated to stay current with changes in your company's processes. Accurate records of all employee exposure and audiometric measurements shall be maintained as required by the regulation.

- The workplace is assessed to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present: (a) Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment; (b) Communicate selection decisions to each affected employee; and (c) Select PPE that properly fits each affected employee. The hazard assessment shall be certified by the person who completed the hazards assessment and the date the assessment was completed.
- Consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected.
- Procedures must be in place to ensure defective or damaged PPE is not used. PPE that is in disrepair must be discarded or removed from service until repaired.

Safety Toe Footwear

- Safety toe footwear meeting the requirements of ASTM F 2412-05 and/or ASTM F 2413-05 must be worn at all times while on the job sites.
- This requirement is also in effect for rubber boots.

Safety Eyewear

- Safety eyewear is required to be worn at all times on jobsites.
- Safety eyewear must meet the requirements of ANSI Z-87.1 and must be equipped with permanent or removable side shields.
- Safety eyewear will be provided to visitors after their completion of the visitor orientation training.

Hand Protection

- Hand Protection will depend on task at hand, and will be worn at all times while performing duties.

Hardhats

- All workers are required to wear hardhat protection at all times while on pipeline projects. Hardhats must meet the requirements of

ANSI Z-89.

2.5 FIRE AND EXPLOSION PREVENTION

General

- Maintain access to fire-fighting equipment at all times. Never lay materials where they cover or prevent access to the equipment.
- Storage shall not obstruct, or adversely affect, means of exit.
- Keep storage site free from accumulation of unnecessary combustible materials.
- Combustible scrap and debris shall be removed at regular intervals during the course of construction.
- No combustible materials shall be stored outdoors within 10 feet of a building or structure.
- Use containers provided for the collection and separation of waste, trash, oily and used rags, and other refuse. Containers used for garbage and other oily, flammable, or hazardous wastes, shall be equipped with covers.
- Only approved containers and portable tanks shall be used for storage and handling of flammable and combustible liquids.
- Locate engine-powered equipment so that exhausts are well away from combustible materials.

2.6 Fire Extinguishers

- Double H Drilling LLC will provide training to familiarize employees with the general principles of fire extinguisher use and the hazards associated with basic fire fighting. This will occur during orientation and once annually.
- Portable fire extinguishers are located in easy access to employees in case of emergency.

- Fire extinguishers must be visually inspected monthly and inspected annually by a certified inspection firm. Monthly inspections must be recorded on the extinguisher tag or on an individual log.
- Fire extinguishers removed from service for maintenance must be replaced immediately with a spare extinguisher of proper type and rating.
- A sufficient number of fire extinguishers shall be available dependent on the tasks at hand. Combustible and Flammable Liquids
- Combustible and flammable liquids must be stored in tanks or closed containers that are labeled to identify their contents along with appropriate hazard warnings.
- PLASTIC CONTAINERS will not be used to collect, store, or transfer flammable liquids.
- Flammable liquids shall not be dispensed into containers unless the nozzle and container are electrically interconnected. This can be satisfied by:
- Having a metallic floor-plate on which the container stands while fill pipe or nozzle is electrically connected to the container or plate.
- Bonding the container to fill stem by means of a bond wire.

2.7 BOAT SAFETY

A Personal Floatation device is required of all personnel. All motorized craft must have a “C” Type fire extinguisher of 10# or more. Boats/Barges must be anchored at two points prior to loading or unloading.

2.8 LADDER SAFETY

Portable ladders shall have nonconductive siderails if they are used where the employee or the ladder could contact exposed energized parts.

- Inspection Before Use

Ladders shall be used only for the purpose for which they were designed. Never use ladder in a horizontal position or as scaffolding, do not place ladders on top of boxes, barrels, crates, etc.

- Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use. Rungs, cleats, and steps of portable ladders (except as provided below) and fixed ladders (including individualrung/step ladders) shall be spaced not less than 10 inches (25 cm) apart, nor more than 14 inches (36 cm) apart, as measured between center lines of the rungs, cleats, and steps. Rungs, cleats, and steps of step stools shall be not less than 8 inches (20 cm) apart, nor

more than 12 inches (31 cm) apart, as measured between center lines of the rungs, cleats, and steps. Rungs, cleats, and steps of the base section of extension trestle ladders shall not be less than 8 inches (20 cm) nor more than 18 inches (46 cm) apart, as measured between center lines of the rungs, cleats, and steps. The rung spacing on the extension section of the extension trestle ladder shall be not less than 6 inches (15 cm) nor more than 12 inches (31 cm), as measured between center lines of the rungs, cleats, and steps.

The minimum clear distance between the sides of individual-rung/step ladders and the minimum clear distance between the side rails of other fixed ladders shall be 16 inches (41 cm). The minimum clear distance between side rails for all portable ladders shall be 11 1/2 inches (29 cm). The rungs of individual-rung/step ladders shall be shaped such that employees' feet cannot slide off the end of the rungs. The rungs and steps of portable metal ladders shall be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.

- Check the ladder for loose, broken, or missing parts before each use.
- When portable ladders are used to reach a surface above the employees, the ladder side rails must extend at least 3 feet above the surface the employees will be stepping onto. A ladder that cannot be extend must be secured to a rigid support that will not cause it slip or move.
- Check metal ladders for corrosion.
- A ladder that does not support itself must be placed at an angle that is safe. This angle is defined by OSHA as being about one-quarter of the working length of the ladder, which is usually known as a 4:1 ratio. This means the ladder must be one foot from the wall for every four feet it reaches up.
- Ensure the ladder to make certain that it is free of oil, grease or any other slippery materials.
- If you find a ladder in poor condition, “Do not Use It.”
- Immediately report it to your supervisor and place a “RED” tag on the ladder.
- All “RED” tagged equipment is not to be used until the safety deficiency is corrected.
- If the ladder cannot be repaired to meet original specifications, then the ladder must be removed from the work area.
- Do not overreach from a ladder. If your belt buckle is higher than the top of the ladder, you are up too far. Get off and move the ladder to get closer to the job.
- Do not stand on top of a stepladder. The belt buckle rule applies too.

- Never lean out on a ladder unsafely. Move the ladder if necessary.
- Take care of the ladder use it safely.
- Wooden or aluminum ladders are not to be used on this project.
- Ladders are built to hold a limited amount of weight. Ladders must not be used if the weight placed on them is more than what the ladder is built to hold.

Depending on the scope of work performed, ladder inspections may be required:

1. (1926) Periodically by a competent person for defects that can be seen and after any event that could make them unsafe to use 2. (1910) Before initial use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury

2.9 CRANE, LIFTING, AND MATERIALS HANDLING

General

- Every employee is authorized to stop any unsafe crane operation.
- The Double H Drilling LLC Crane Operations Program is based on OSHA 29 CFR 1926.550 (New Standard 29 CFR 1926.1400).
- Load Charts must be posted in the crane cab.
- Daily equipment inspections are to be documented.
- Hooks shall have safety latches in place
- Rigging is to be inspected prior to use daily.
- Crane inspections (annual, monthly and daily) will be completed and be made available as needed.
- Taglines shall be used during all lifting operations, except for multiple equipment lifts, and where the tag line might create a greater personnel hazard.

Maintenance

- A Preventive Maintenance (PM) program is required for all cranes.
- Qualified Mechanics or Qualified Operators will do repairs. Only a Qualified Mechanic shall make repairs to critical components (structural parts, ball ring, bolts, wire rope, winches, sheaves, pins, and boom sections).
- Any malfunction of the crane must be reported to the Double H Drilling LLC Project Superintendent immediately. The discrepancy will be documented and addressed prior to any further use of the crane.

2.10 MANUAL MATERIAL HANDLING

GUIDELINES

- Lifting limits for one person (ideal lifting circumstances) 45 pounds is the maximum weight to be lifted and/or carried by one person using two hands and standing erect.
- 90 pounds is the maximum weight to be lifted by two persons standing erect, with the load is uniformly distributed between the two persons.
- Not more than 75% of the one-person lifting limit shall be added for each additional lifter.
- Lifters should not interfere with one another while lifting and there is adequate workspace.

Lifting limits (Non-ideal lifting circumstances)

- Less than 45 pounds is the maximum weight to be lifted and carried for non-ideal lifting circumstances (bent over or when reaching out more than 12 inches from the front of the body).
- Lifting limits are applicable to an object with uniform mass distribution and compact size not exceeding 18 in. high, 18 in. wide, and 12 in. away from the lifter. This places the handholds at 6 inches away from the body.
- If the depth exceeds 24 inches, the permissible weight should be reduced by 33%. Carrying loads and weight limit reduction
- 45 lbs is the maximum allowable weight to be carried by one person up to a distance of 35 ft.
- Beyond that distance, the maximum weight should be 35 lb.
- The maximum weight carried at a person's side, with a top handle, should be 30 lb.

Mechanical Lifting Assists

- Mechanical lifting aids (e.g., trolleys, monorails, beams suitable for use with a beam clamp, portable A-frame hoist) shall be provided for each item weighing more than the acceptable lifting limits described above.
- If A-frame hoists are used, sufficient space must be provided around the lifted item to allow the hoist to be installed and moved to an area where the item can be transferred to a crane or other mode of moving. Handles

- All removable or carried units shall be provided with a handle or other suitable means for grasping, handling, and carrying. Items requiring handling should be provided with a minimum of two handles.
- Items weighing less than 10 lbs, whose form permits them to be handled easily, may be exempt.
- Handles shall be located relative to the center of gravity of the unit to preclude swinging or tilting when lifted.
- They shall be located to provide at least 2.5 inches of clearance between the handle and adjacent obstructions during handling.

3. Emergency Action Plan Requirements

3.1 EMERGENCY RESPONSE CONTACT INFORMATION

- Contact information must be posted at each work location.
- Local Emergency contact information shall be posted in a location that is accessible to all employees.
- GPS Coordinates
- Nearest crossroad
- Nearest medical facility
- Emergency notification phone number (911)

Employee emergency medical information shall be documented and kept by the Double H Drilling LLC Crew Foreman and Superintendent.

- **3.2** Double H Drilling LLC PROJECT SUPERINTENDENT

RESPONSIBILITIES

In an emergency situation the Double H Drilling LLC Project Superintendent, shall do the following:

- Assess the situation to determine whether an emergency exists requiring activation of emergency procedures.
- Supervise all efforts, including evacuating employees.
- Contact or notify local authorities, if required.

- Take all necessary measures to contain the hazard and prevent its spread to other nearby areas, with the assistance of emergency personnel.
- If hazardous material spill, ensure that the hazardous material and any material that came in contact with water, gravel, soil, etc., will be removed using shovels and/or brooms and oil containment absorbent booms (See Oil Pollution and Response Plan and Waste Management Plan for the proper disposal of hazardous materials).
- Any spills or releases involving a hazardous substance shall be reported to Client.
- Provide for collection, treatment, and disposal of the waste and contaminated material by the emergency crew or outside contractor, as appropriate.
- Ensure that contaminated soil, liquids, or other materials are placed in drums and handled as a hazardous waste.
- Ensure that the cause of the emergency has been investigated and eliminated and that cleanup and restoration have progressed at least to the point where the health and safety of the employees are not in jeopardy.
- Any spills or releases involving a hazardous substance at or above its reportable quantity shall be reported to the agency in charge.

3.3 EMERGENCY ALERTS

Double H Drilling LLC uses the following alerts or alarms:

- Radios in company trucks
- Telephones and verbal alerts
- Emergency telephone numbers are posted near telephones, or emergency notice boards, and other conspicuous locations.

3.4 EMERGENCY PROCEDURES IN CASE OF SEVERE WEATHER

- Once employees are made aware of a severe weather situation, employees shall:
- Get inside nearby trucks or other vehicles in case of lightning. The designated radius of a lightning strike is 5 miles as indicated by appropriate weather app. In the case of predicted/reported fast moving storms the supervisor may at his discretion extend this range to 7 miles. ** Certain areas are prone to storms arriving quickly. In these cases both Client and Double H Drilling LLC will follow (cab up) upon hearing or observing thunder/lightning no matter the distance. ** The all clear is to be given after 30 minutes have elapsed following the last strike in the designated radius. In the case of crews in a small area “cab up” will be given verbally. In the case of crews out of earshot 3 blasts of an air horn designated seek shelter.

- Seek appropriate shelter in the event of a Tornado in the area.
- Employees are not to leave the shelter or return to their regular duties until the All Clear is given.

3.5 PRE-EVACUATION PROCEDURES

Any employee who detects an emergency such as a fire or hazardous release should sound the alert to warn other employees on that jobsite.

- All employees shall immediately proceed to a designated safe area.
- Crew Foreman will take an employee count of personnel.
- Crew Foremen will evaluate the emergency, consult with the Project Superintendent, and decide if it is safe to return to the emergency area and take corrective actions.
- Crew Foreman must immediately notify the Project Superintendent, and the Company or his representative of the emergency.
- Project Superintendent shall make any notifications to emergency response teams and provide assistance if needed.
- Crew Foremen shall take necessary control to handle the emergency condition.
- Double H Drilling LLC Superintendent shall consult with the Project Superintendent regarding cleaning up the incident area and making necessary repairs to damaged equipment only if the damaged equipment or facility is not part of an investigation, as it shall not be disturbed until the investigation is complete.
- Project Safety Director will conduct an incident investigation.
- Upon instruction from Project Superintendent, all employees will return to their regular work duties.

3.6 EMERGENCY PROCEDURES (RECORDS AND SECUREMENT)

- Superintendent will maintain a list of personnel that are working on the Project.
- Superintendent will make the determination of whether to send the workers home.
- Securing all-important records, logs, receipts and files.
- Superintendent will remove all important records, logs, receipts during evacuation.

4 Oil Pollution and Response

NOTE: For most projects, there are no hazardous materials of quantity to be noted other than oils and fuels used in construction equipment; therefore, this plan only covers those items. Also, this project is not working near or adjacent to any wetlands or waterbodies. No wetlands are expected to be encountered.

5 Waste Management Plan

- The amount of waste that will be generated will be estimated prior to work being performed so that the need for containers and waste removal will be determined. If necessary we will have a container for scrap metal.

5.1 OBJECTIVES

Employees will be instructed on the proper handling, storage and disposal of wastes. This may include general instruction on disposal of non-hazardous wastes, trash or scrap materials. If wastes generated are classified as hazardous, employees will be trained to ensure proper disposal.

- Eliminate or reduce the volume of waste materials requiring disposal;
- Prevent improper or unsafe handling and storage of waste materials;
- Prevent improper labeling, manifesting, and disposal of waste materials;
- Prevent illegal discharge of waste materials into the environment.

5.2 WASTE IDENTIFICATION

Waste materials should be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.

- Waste can be identified by physical appearance, determination of its source, and inspection of its original container for labels, reading SDS information, and laboratory analysis of samples, if necessary.

5.3 MUNICIPAL WASTE

- Ordinary solid wastes that do not pose a health or environment hazard.
- Non-hazardous solid household wastes i.e., general trash, paper, plastic, cardboard, pallets, wood, “empty” paint cans, and other forms of ordinary domestic refuse that

can be accepted by, municipal waste landfills. We strongly urge our employees to Recycle. You will be taught proper segregation of waste materials to ensure opportunities for reuse or recycling.

5.4 NON-HAZARDOUS INDUSTRIAL WASTE

- Drained crankcase oil filters
- Used cooking oil
- Absorbent materials used in oil spill cleanup operations including oily rags, absorbent pads, and booms
- Wastes are to be collected in separate containers and recycled, if possible
- Disposal shall be at a Company-approved industrial nonhazardous disposal facility

5.5 HAZARDOUS WASTE

- Any material not intended for use or reuse and is to be discarded.
- Any solid or liquid waste that is either listed by the EPA or is ignitable, corrosive, reactive or toxic.

5.6 UNIVERSAL WASTE

- Material must be recycled and are generally “exempt” from the hazardous waste manifesting requirements.
- Examples:
- Batteries;
- Lamps (fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide bulbs); and
- Mercury thermostats.
- This project will not accumulate a total of 11,000 pounds or more of universal waste at any time, and is therefore, by definition, a small quantity generator.
- Universal waste will be identified, stored, and frequently recycled.

5.7 MARKING AND LABELING CONTAINERS

Double H Drilling LLC has a copy of each SDS of every chemical used and is available at every job trailer.

- All containers and packages on the project site shall be clearly and properly labeled, with stencil, sticker, or warning label, as to their contents and potential hazards. Container labels must contain at least the following information:

1. Product identifier; 2. Signal word; 3. Hazard statement(s); 4. Pictogram(s); 5. Precautionary statement(s); 6. And name, address, and telephone number of the chemical manufacturer, importer or other responsible party."

- All markings and labels shall be clearly visible, easy to read and understand, and weatherproof.
- Damaged labels shall be replaced immediately.

5.9 SHIPPING

- Placards for vehicle or vessel shall be placed on over-the-road vehicles, rail vehicles, or vessels as required for the transportation of any hazardous or non-hazardous materials.
- An SDS must accompany each shipment. Before employees perform non-routine or special tasks that may expose them to hazardous chemicals, they are trained on the hazards associated with those chemicals.
- will only utilize Company approved contractors for the transport of wastes generated during construction.

5.10 DISPOSAL OPTIONS

- Disposal of waste at commercial, off-site approved facility
- Employees will be trained on the dangers of the hazardous chemicals they work with. This training will be given during orientation and any time a new chemical is introduced into the workplace. This training will cover types of hazards of all chemicals. Chemical-specific information will always be available through labels and safety data sheets (SDS). David Burrow will provide each job, with information concerning hazardous chemicals in use, methods of providing SDS sheets, methods of precautionary measures to be taken and methods of providing information on labeling systems. Each Superintendent will carry a list of all approved chemicals and their SDS.

6. Security and Control

6.1 EQUIPMENT SECURITY

- The crew will secure all equipment at the end of workday hours.
- Keys shall be removed and doors locked on all equipment left in an unsecured area. An alternate to locking may be a mater switch or other disabling device or mechanism.
- A night watchman may be used to provide added security to all worksites..

7. Foreign Pipeline Incident Plan

Foreign pipeline crossings may be in the area of some excavation during this project. In the event that actual crossings (Exposures) should occur the following program shall be in effect.

- A foreign pipeline incident shall be defined as any activity that has resulted in an actual or potentially adverse impact to an existing pipeline, including:
- Excessive movement of the pipeline,
- Damage to the pipe and/or coating, bending, buckling, crushing, puncturing, tearing, or shearing, whether or not a release of product or materials has occurred.

7.1 HAZARDS IDENTIFICATION

- Hand jetting or undercutting the existing pipeline (loss of support);
- Dropped materials and equipment;
- Abrasion of the pipeline coating;
- Interference with the existing cathodic protection system;
- Overstressing of the pipeline due to excessive movement;
- Inadequate temporary support of the pipeline;

7.2 PROTECTION FROM HAZARDS

Construction procedures to mitigate potential hazards:

- Setting spuds, and jetting only in areas cleared and staked by the surveying employees,
- Hand jetting within a specified distance of a foreign pipeline;

- Minimizing the length of unsupported free spans (25’) and providing temporary or permanent support of excessive spans;
- Reducing the potential for dropped objects and equipment.

7.3 PIPELINE/UTILITY DETECTION

Foreign utilities and pipelines along the pipeline route prior to construction shall be precisely and accurately located.

7.4 FOREIGN PIPELINE OPERATOR PRECONSTRUCTION NOTIFICATION

- Each foreign pipeline operator shall be contacted within the time period specified in each crossing agreement (but never less than 48 hours) prior to the approach of any excavation equipment to the vicinity of the foreign pipeline and its associated exclusion zone.
- shall request the presence of the foreign pipeline company representative whenever work is to be conducted around the foreign pipeline.

7.5 MAJOR CONSEQUENCES

Major consequences of damage to the foreign pipelines, i.e. spills, fire and explosion, and worker exposure to hazardous conditions should be reiterated in each job safety analysis (JSA) completed prior to performing the work and in daily tailgate safety meetings.

7.6 MONITORING AND INCIDENT DETECTION

All operators shall closely monitor the pipeline lift point’s activities, for any indication of contact with a foreign pipeline. Upon such indication:

The operators shall cease all activities, Warn all personnel, and Immediately notify the Project Superintendent.

- As soon as the source is identified, and once the safety of all personnel is assured, the Superintendent shall notify the foreign pipeline operator.
- Superintendent shall inspect each foreign pipeline upon completion of the crossing, but prior to re-burial or capping with mats, for any damage that may have been done to the pipe or coating as a result of the construction activities.

7.7 COMMUNICATIONS

- Communications equipment will be tested daily to ensure it is in good working condition.

- Work shall not proceed in the vicinity of a foreign pipeline without properly functioning communications equipment.

7.8 CONTACT INFORMATION

- A list of all appropriate incident contact information shall be posted at all job locations including active vessels.
- Superintendent shall confirm and update this list prior to mobilization, and at least monthly thereafter, and as key information changes.

7.9 SHUTDOWN AND EVACUATION

- The first priority in an emergency situation involving a foreign pipeline incident shall be the safety of the crew and any members of the public in the area.
- Superintendent shall immediately assess the situation and take appropriate action, including, but not necessarily limited to, the following.
- Immediately shut down all equipment;
- Extinguish all sources of ignition;
- Evacuate all personnel to a safe distance; and
- Secure the area to prevent entry by unauthorized personnel.

7.10 SOURCE CONTROL (NOTIFICATION AND SHUTDOWN)

As soon as it is safe to do so the Foreman or Superintendent shall contact the operator of the impacted pipeline and request:

- An immediate shutdown of the system pressurizing the pipeline;
- Isolation of the damaged segment, both upstream and downstream; and
- Venting of the pipeline to relieve residual pressure, if possible.

If the supervisor is injured or otherwise unable to make this notification, the next most senior employee at the site of the incident shall make the notification.

7.11 INCIDENT NOTIFICATION

In the event of an incident, the Superintendent shall, after assuring the safety of the crew, make all necessary notifications.

- All notifications shall be made first by voice communication (i.e. in person, by telephone, or by two-way radio) by the Superintendent, designated representative, or most senior employee at the site.

- Communications shall be logged according to time, parties participating, and information exchanged, and such logs shall be maintained on the job site.
- Voice communications shall be followed up as soon as practical, not to exceed 24 hours, in writing by fax or e-mail, with confirmation of receipt of message by recipient(s).

7.12 SPILL CONTAINMENT

- Superintendent deems it safe to enter and work in the area, and the release is in the form of a liquid (i.e. crude oil), shall mount an initial spill containment response.
- Procedures for safe deployment, operation, and maintenance of the spill containment equipment, as well as the effective operating conditions (i.e. maximum wind, current, wave height) of the equipment shall be adhered to.
- Only those employees and subcontractors with current and appropriate training shall be involved in the deployment of the spill containment equipment and materials.
- The prioritization of areas requiring the most immediate protection, shall be, in order:
- Nesting bird colonies
- Water drainage areas
- Wetlands and marsh;
- Mud flats; and
- Sandy beaches.

7.13 FIRE CONTROL

If a fire occurs or is imminent, the Superintendent shall immediately evacuate the area, including the public.

- personnel should attempt to fight a fire only if fire is relatively small and easily extinguished by trained personnel with available on-site equipment, or there is an immediate threat to human life.
- Superintendent shall immediately contact the appropriate firefighting unit(s).

7.14 UNIDENTIFIED PIPELINES/UTILITIES

- If foreign pipeline/utilities are discovered before an incident occurs, the Superintendent shall immediately suspend construction activities in the area until the pipeline/utilities and its operator can be identified and/or a crossing-specific plan can be developed, unless otherwise instructed by the Client.
- will respond to an accidental spill or leak once it is deemed safe with response materials.

7.15 COOPERATION WITH FOREIGN PIPELINE OWNER/ OPERATOR

Superintendent shall cooperate fully with foreign pipeline companies, including providing necessary and appropriate personnel and equipment to transport the operator’s representatives to and from the site.

7.16 REPAIRS

Repairs, both temporary and permanent, must be completed to the satisfaction of the foreign pipeline operator, and the cause of the incident remedied, before we will be allowed to continue with the crossing construction at that location.

- shall perform temporary repairs to the damaged pipeline as necessary to reduce or eliminate the continuation of the release, to prevent further damage, and to secure the site for the safety of the workers and the public.
- shall perform permanent repairs to the damaged pipeline as necessary to return the pipeline to its original condition and service.
- The foreign pipeline company may elect to perform their own repairs, in which case we shall provide assistance and access to the site.

7.17 CLEANUP AND DISPOSAL

- shall clean up spills by collecting, removing, and disposing of all absorbent and released materials successfully contained, and by removing and decontaminating, all spill containment equipment.
- Contaminated materials shall be disposed of at approved disposal facilities, appropriate for the type and characteristics of the materials being disposed.
- Free-phase hydrocarbons should be recycled, if possible.
- Cleanup and disposal activities shall be done by personnel or by Client-approved third party services under the direct control of the Client.

7.18 MITIGATION OF ENVIRONMENTAL IMPACTS

shall cooperate with Company and regulatory agencies in determining and executing appropriate mitigation measures.

7.19 EMERGENCY FIRST AID/CPR

employees trained and proficient in first aid/CPR shall provide emergency first aid to any workers, Client employees, foreign pipeline representatives, or other individuals (including the public) injured as a result of a foreign pipeline incident. Before employees perform nonroutine or special tasks that may expose them to hazardous chemicals, they are trained on the hazards associated with those chemicals. If The Client is to have access to any stored chemicals the Project Superintendent shall be provided all of Double H Drilling LLC’s SDS.

7.20 EVACUATION

· In the event of an incident, we shall provide the means for timely evacuation of injured personnel; first to a safe location, and ultimately to appropriate health care facilities.

7.21 REPORTS AND RECORD KEEPING

- Immediately after a foreign pipeline incident has occurred, and as soon as it is safe to do so, the Superintendent shall contact the Client in person or by telephone or fax.
- Superintendent shall record all activities, conversations, and observations associated with the incident and provide a written daily report to Client.

8. Refueling Procedure

8.1 REFUELING EQUIPMENT

Fuel Station (stationary)

- Assured grounding is utilized during the fueling operations.

8.2 SMALL FUEL STORAGE BARGE (NOT REQUIRED)

8.3 FUELING EQUIPMENT ON DREDGE, OR JETTING BARGE FROM FUELING STATIONS OR FUEL TANKS. (NOT REQUIRED)

8.4 SPILL RESPONSE

- During any fueling process, containment equipment shall be accessible in case of any spills.
- The superintendent will be responsible for notifying the Client
- In the event of a leak or spill during the fuel transfer process the following procedure will be activated:
- Stop all pumping activity by de-energizing the fuel transfer pump.
- Stop all adjacent ignition sources, (engines, equipment, electrical sources, etc.)
- Position personnel with fire extinguishers.
- Recover the hose and nozzle on top of the fueling source.
- Deploy spill containment equipment to the spill area to recover the spilled material.
- Notify the Superintendent and get assistance if needed in deploying the spill containment equipment.

9. Excavations

9.1 ALL EXCAVATIONS SHALL MEET THE REQUIREMENTS OUTLINED IN CFR 1926.650.

- “Soft Excavation” shall be used to identify any/all utilities within the projected excavation area.
- The Ground Disturbance Code of Practice is to be followed during this project.

9.2 COMPETENT PERSON

- The competent person shall remain onsite while activities are ongoing.
- The competent person shall inspect and document findings of the excavation daily and prior to any employee entering the excavation.
- The competent person shall identify and resolve any hazards.

- The competent person shall monitor the air in all excavations that exceed 4 ft in depth or in any excavation that poses a risk of a hazardous atmosphere.
- The competent person shall ensure that a means of access and egress is provided within 25 lateral feet of any employee working in the excavation. This means shall not pose any undue hazard to employees entering or exiting the excavation.
- Diesel equipment used less than twenty feet from the edge of the excavation must be equipped with a Positive Air Shut Off device.

9.3 SUPPORT METHODS

All excavations of 4ft or more or any excavation that has potential for cave- in shall require a means of support for the walls of the excavation.

9.3.1 Sloping/Benching

- All sloping/benching shall be completed as addressed in 1926.650
- All excavations are type “C” unless 2 means of testing are completed verifying the true soil type.
- It is a best practice to classify all pipeline projects as Type “C” due to the probability of disturbed soil in the projected area of excavation.

9.3.2 Trench Boxes

- Trench Boxes shall be used per the manufacturer’s directions and specifications.
- Trench Boxes shall be backfilled to within 18” of the top of the box or edge protection devised. In lieu of 18” freeboard competent person may choose to use edge protection or barricade.
- All trench boxes shall have the registration plates intact or have the appropriate documentation onsite.
- Spoils shall be placed a minimum of 3 ft. from the edge of the excavation.

9.4 AIR MONITORING (EXCAVATIONS)

- All excavations 4ft in depth or more shall require air monitoring prior to entry.
- Air Monitoring for Oxygen, LEL, Carbon Monoxide and Hydrogen Sulfide shall be completed by a competent person.
- Readings shall be documented and kept in the job file.
- All air monitoring equipment shall be calibrated monthly or sooner if needed by a competent person.

- Continuous air monitoring shall be done in excavations that have readings outside acceptable levels and in excavations that have a potential for hazardous atmospheres.

9.5 SURFACE WATER

- All surface water shall be diverted away from the excavation.
- Any accumulating water within the excavation shall be removed promptly.
- During inclimate weather, continuous water removal may be required.
- The competent person shall inspect the excavation regularly during inclimate weather conditions.

9.6 VEHICULAR TRAFFIC PROTECTION

- Barricades shall be used when working in areas where vehicle traffic poses a hazard to the site workers.
- Barricades shall provide optimum protection and shall be water-fill or made of concrete or steel.
- Appropriate signage shall be posted to alert traffic to construction work in the area.
- Any site workers within this area shall wear high visibility vests at all times.

10. Hot Work

- Prior to any Hot Work, Company authorization shall be obtained in writing.
- Air monitoring is required to be performed continuously
- Trained designated Fire Watch personnel are required at all times.
- Combustible/Flammable materials shall be removed from the area.
- Sparks and slag shall be contained to reduce exposure
- Company permits shall be completed by a competent person/ Company Representative prior to start of any Hot Work.
- The permit shall be reviewed with all personnel involved with the Hot Work.
- Fire Resistant Clothing (FRC) shall be worn during all Hot Work activities.
- During “Hot” Tie-ins, 2 means of vapor suppression are required if the line has not been purged with Nitrogen.
- A Mud Plug shall be used with Nitrogen or Carbon Dioxide (Dry Ice) behind the plug.

- It is recommended that the line be vented to relieve any pressure build- up behind the plug. In cases where venting is not available, consult the client-specific procedure for vapor barriers. 11 Only qualified operators shall operate any equipment
- All equipment shall stay clear of all excavation edges to prevent cave-in and rollovers.
- All heavy equipment shall have working back-up alarms
- A spotter shall be used during all heavy equipment movement and excavating.
- The spotter shall have a means of warning the operator of hazards in the area. Spotters shall utilize an orange or red flag to capture the operator’s attention when required.
- The spotter shall be designated to watch for overhead powerline proximity to the equipment during operation and movement.
- Cellphone usage is prohibited for both operators and spotters while heavy equipment is being operated.

11 Location Markings

- All appropriate “One Call” Notifications shall be completed with the standard 48 hour time frame for locating foreign utilities within the projected location of the bore.
- It could be possible that individual utilities will have to be notified individually.
- All parties involved will meet in a pre-job meeting to ensure correct locations are marked and that no foreign utilities or pipelines are in the path of the bore.

12. Erosion Control

During any/all construction and maintenance activities, erosion control shall be practiced as outlined in the Double H Drilling LLC procedures, Best Management Practices, and environmental permits. Controls shall be in place until vegetation or gravel cover is in place to prevent high effluent run-off. Re-seeding and ground cover shall remain undisturbed after placement. * See applicable permits and contract procedures for details.

Accepted methods of erosion control;

- Silt fence
- Straw bales
- Appropriate ground cover and seeding.
- Straw rolls/matting
- Settling ponds
- Rip Rap
- Dikes

Double H Drilling LLC COVID-19 Exposure Prevention, Preparedness, and Response Plan

Double H Drilling LLC takes the health and safety of our employees very seriously. With the spread of the coronavirus or “COVID-19,” we all must remain vigilant in mitigating the outbreak and preventing exposure. In order promote safety and maintain operations, we have developed this COVID-19 Exposure Prevention, Preparedness, and Response Plan (the “Plan”) to be implemented throughout the Company and at our jobsites. We have also identified a team to monitor available U.S. Center for Disease Control and Prevention (“CDC”) and Occupational Safety and Health Administration (“OSHA”) guidance on the virus.

This Plan is based on currently available information from the CDC and OSHA, and is subject to change based on further information provided by the CDC, OSHA, and other public officials. The Company may also amend this Plan based on operational needs.

I. Responsibilities of Managers and Supervisors

All managers and supervisors must be familiar with this Plan and prepared to answer questions from employees. Managers and supervisors should strive to set a good example by following this Plan at all times. This involves practicing good personal hygiene and jobsite safety practices to prevent the spread of the virus. Managers and supervisors should encourage this same behavior from all employees.

II. Responsibilities of Employees

All employees are required to help with our prevention efforts to minimize the spread of COVID-19 at our jobsites and places of work. As set forth below, the Company has instituted various housekeeping, social distancing, mitigation efforts, and other best practices at our jobsites and places of work. All employees should follow these. In addition, employees are expected to report to their managers or supervisors if they are experiencing signs or symptoms of COVID-19, as described below. If you have a specific question about this Plan or COVID- 19, please ask your manager or supervisor. If they cannot answer the question, please contact the safety director.

OSHA and the CDC have provided the following control and preventative guidance to all workers, regardless of exposure risk:

- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Follow appropriate respiratory etiquette, which includes covering for coughs and sneezes.
- Avoid close contact with people who are sick.
- Practice good health and hygiene habits. In addition, employees must familiarize themselves with the symptoms of COVID-19:
- Coughing;
- Fever of 100.4 degrees Fahrenheit [37.8°C] or higher;
- Shortness of breath, difficulty breathing; and
- Early symptoms such as chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. If you develop a fever and symptoms of respiratory illness, such as cough or shortness of breath, DO NOT GO TO WORK and call your healthcare provider right away. Likewise, if you come into close contact with someone showing these symptoms, call your healthcare provider right away and notify your manager or supervisor.

III. Guidance on Employees Exposed to COVID-19

The CDC has provided guidance for employers regarding safety practices for “critical infrastructure workers” who may have been exposed to a person with a suspected or confirmed case of COVID-19. Construction has been deemed as critical infrastructure by the U.S. Department of Homeland Security’s Cybersecurity and Infrastructure Security Agency (“CISA”) and many state and local jurisdictions have similarly deemed construction as critical infrastructure (or “essential”) during the COVID-19 pandemic. Given this, Double H Drilling LLC may allow employees exposed or potentially exposed to a suspected or confirmed case of COVID-19 to continue working pursuant to the following recommended practices, which is consistent with CDC recommendations.

Subject to confirmation from the employee’s manager or supervisor, if a critical infrastructure employee has been exposed or potentially exposed to a suspected or confirmed case of COVID-19, Double H Drilling LLC may permit the employee to continue to work pursuant to the following recommended practices:

- Measure temperature of employee before he or she enters the worksite (see Appendix A for additional information);
- Regularly monitor asymptomatic employee;
- Exposed or potentially exposed employee to wear a mask/face covering for 14 days after exposure;
- Employee to maintain social distancing as work duties permit; and
- Routinely disinfect workspaces. LEB may choose to keep the exposed or potentially exposed employee away from work for 14 days. See also Section VI below.

IV. Protective Measures

The following protective measures should be implemented at all jobsites and places of work.

A. General Safety Policies and Rules

- Any employee/contractor/visitor showing symptoms of COVID-19 will be asked to leave. Employees who have symptoms of acute respiratory illness, or known symptoms associated with COVID-19 are recommended to stay home and not come to work until they are free of fever (100.4° F [37.8° C] or greater using an oral thermometer), signs of a fever, and any other symptoms for at least 72 hours, without the use of fever-reducing or other symptomaltering medicines (e.g. cough suppressants). Employees should notify their supervisor and stay home if they are sick. A discussion with their supervisor about the return to work is required.

- Double H Drilling LLC may determine that taking employee/ contractor/visitor temperatures is appropriate and restrict access based upon temperature readings. As an alternative to taking temperatures, Double H Drilling LLC may request employees/ contractors/visitors to take their own temperatures prior to coming to the worksite. (See Appendix A for additional information.)
- Face-to-face meetings should be limited in both time and occurrence, increasing the use of the use of telephone and video conferences, and increasing the reliance on the electronic exchange of information. During any in-person meetings, avoid gathering in groups of more than 10 people and practice appropriate distancing (at least six (6) feet apart).
- Employees should avoid physical contact with others (e.g., avoid shaking hands) and maintain personal space of at least six (6) feet, where possible. Where work trailers are used, only necessary employees should enter the trailers, and all employees should maintain social distancing while inside the trailers.
- Employees are encouraged to stagger breaks and lunches, if practicable, to reduce the size of any group to less than ten (10) people. Additionally, employees are encouraged to avoid cafeterias, restaurants, and other gathering locations and to take their breaks at assigned workstations.
- If access to running water for hand washing is impracticable, the Company will strive to provide alcohol-based hand sanitizers and/ or wipes. Where available, additional hand washing stations will be considered. Employees are also encouraged to use their own sanitizers.
- Employees should limit the use of shared tools, equipment, and workstations, where practicable. To the extent tools, equipment, or workstations are shared, increased cleaning by use of alcoholbased wipes or other disinfectants to clean tools, equipment, and workstations before and after use should be implemented. When cleaning tools and equipment, consult manufacturing recommendations for proper cleaning techniques and restrictions.
- If practicable, employees should use/drive the same tool, vehicle, piece of equipment, or workstation every shift.
- Employees are encouraged to minimize ride-sharing and/or the use of public transportation, if possible. While in vehicle, employees should ensure adequate ventilation and consider the use of face coverings. Public travel, especially airlines, should be done, if at all, in consultation with management.
- In lieu of using a common source of drinking water, such as a cooler, employees should use individual water bottles.

B. Visitors

- Visitors to the jobsite, including the trailer or office, should be limited to only those necessary for the work.
- All visitors should be screened in advance of arriving on the jobsite. Visitors answering “yes” to any of the following questions should not be permitted access:
- Have you been confirmed positive for COVID-19?
- Are you currently experiencing, or recently experienced, any acute respiratory illness symptoms such as fever, cough, or shortness of breath?
- Have you been in close contact with any persons who have been confirmed positive for COVID-19 and are also exhibiting acute respiratory illness symptoms?
- Have you been in close contact with any persons who have traveled and are also exhibiting acute respiratory illness symptoms?
- Site deliveries will be permitted but should be properly coordinated in line with the employer’s minimal contact and cleaning protocols. Delivery personnel should remain in their vehicles if at all possible.

C. Personal Protective Equipment (“PPE”) and Work Practice Controls

- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide:
- Gloves: Gloves should be worn at all times while on-site. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves. Employees should avoid sharing gloves.
- Eye protection: Eye protection should be worn at all times while onsite. D. Face Coverings

Employees are encouraged to wear a face covering consistent with CDC recommendations. Additionally, Double H Drilling LLC may implement a face covering policy for certain work activities for the foreseeable future, including those situations where (1) it is mandated by state or local rule, or (2) employees must work in proximity of six (6) feet from other employees. A face covering is a cloth, bandana, or other type of material that covers a person’s nose and mouth. The CDC lists five criteria for “cloth face coverings” - the face covering should:

- fit snugly but comfortably against the side of the face;
- be secured with ties or ear loops;

- include multiple layers of fabric;
- allow for breathing without restriction; and
- be able to be laundered and machine-dried without damage or change to shape. Use of a face covering is not a substitute for other workplace preventative techniques that are outlined in this Plan. Where a face covering is mandated by state or local governments, employees will be required to comply.

E. State and Local Requirements

Managers and supervisors should familiarize themselves with any additional state or local ordinances or orders imposing more stringent requirements. Employees should do the same. Any questions about state or local requirements should be directed to the manager or supervisor.

G. Owner-specific Requirements

Should an owner or specific project require additional safety practices, managers or supervisors will provide instruction to employees such that the practices may be implemented.

V. Cleaning and Disinfecting

The Company has instituted regular housekeeping practices, which includes cleaning and disinfecting frequently used tools and equipment, and other elements of the work environment, where possible. Employees should regularly do the same in their assigned or personal work areas.

- Jobsite trailers and break/lunchroom areas should be cleaned at least once per day. Frequently touched surfaces, including workstations, countertops, and doorknobs, as well as items of common use should be cleaned daily. Refer to recommendations on cleaning issued by the CDC.
- Any trash collected from the jobsite must be changed frequently by someone wearing nitrile, latex, or vinyl gloves.
- Any portable jobsite toilets should be cleaned regularly. Hand sanitizer dispensers should be filled regularly. Frequently touched items (i.e., door pulls and toilet seats) should be disinfected regularly.
- Vehicles and equipment/tools should be cleaned at least once per day by the operator and before a change in operator or rider.
- Appropriate cleaning solutions and disinfectants should be available. Employees are encouraged to notify supervisors of depleted supplies.

VI. Jobsite Exposure Situations

Employee Exhibiting COVID-19 Symptoms

If an employee exhibits COVID-19 symptoms, the employee must remain at home until he or she is symptom free for 72 hours (3 full days) without the use of fever-reducing or other symptom-altering medicines (e.g., cough suppressants), or as otherwise directed. The Company will similarly require an employee that reports to work with symptoms to return home until the employee is (1) symptom free for 72 hours (3 full days) and (2) at least ten (10)

days have passed since the symptoms first appeared.

Employee Tests Positive for COVID-19

An employee that tests positive for COVID-19 will be directed to selfquarantine away from work. Employees that test positive and are symptom free may return to work when at least ten (10) days have passed since the date of his or her first positive test, and have not had a subsequent illness or developed COVID-19 symptoms.

Employees with symptoms that test positive and are directed to care for themselves at home may return to work when: (1) at least 72 hours (3 1 full days) have passed since recovery; and (2) at least ten (10) days have passed since symptoms first appeared.

Employees that test positive and have been hospitalized may return to work when directed to do so by their medical care provider. The Company may require an employee to provide documentation clearing their return to work.

Employee Has Close Contact with a Tested Positive COVID-19 Individual

Employees that have come into close contact with a confirmed-positive COVID-19 individual (co-worker or otherwise) should notify their supervisor and will be directed to either: (1) continue to work, provided they remain asymptomatic in accordance with Section III above; or, if they are symptomatic or the Company chooses to follow more conservative protocols, (2) self-quarantine for fourteen (14) days from the last date of close contact with the carrier. Close contact is defined as six (6) feet for a prolonged period of time.

If the Company learns that an employee has tested positive, the Company will conduct an investigation into co-workers that may have had close contact with the confirmed-positive employee in the prior fourteen (14) days and direct those individuals that have had close contact with the confirmed-positive employee to either continue to work, provided they remain asymptomatic in accordance with Section III

above, or, if they are symptomatic or the Company chooses to follow more conservative protocols, to self-quarantine for fourteen (14) days from the last date of close contact with the carrier. The Company may also require said symptomatic employee who has self-quarantined for fourteen (14) days to obtain

If an employee learns that he or she has come into close contact with a confirmed-positive individual outside of the workplace, he/she must alert a manager or supervisor of the close contact. 1 Recovery is defined as: (1) resolution of fever without the use of feverreducing medications; and (2) improvement in respiratory symptoms (e.g., cough, shortness of breath).

confirmed negative COVID-19 tests, administered by a medical professional, and spaced at least twenty-four (24) hours apart prior to returning to work.

The employee must have a confirmed

The employee must have two (2) negative COVID-19 test, administered by a medical professional, prior to returning to work.

spaced at least twenty-four (24) hours apart prior to returning to work.

The employee must have two (2) confirmed negative COVID-19 tests, administered by a medical professional, and

a confirmed negative COVID-19 test, administered by a medical professional, prior to returning to work. Employees should be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease, and when it is appropriate to return to work after illness. Disease containment plans and expectations should be shared with employees. Communicating information with non-English speaking employees or those with disabilities must be considered. Flexible work policies should be developed as possible. Workers should be encouraged to stay at home when ill, when having to care for ill family members, or when caring for children when schools close, without fear of reprisal. Business continuity plans should be prepared so that if significant absenteeism or changes in business practices are required business operations can be effectively maintained. Tele-commuting or other work-at-home strategies should be developed. Workers should be encouraged to obtain appropriate immunizations to help avoid disease.

Granting time off work to obtain the vaccine should be considered when vaccines become available in the community. Key contacts, a chain of communications and contact numbers for employees, and processes for tracking business and employees status should be developed. A procedure must be developed to notify key contacts including both customers and suppliers in the event an outbreak has impacted your

company's ability to perform services. This procedure must also include notification to customers and suppliers when operations resume. Social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings should be considered. Clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) periodically and when visibly soiled. Work surfaces should also be cleaned frequently using normal cleaning products. The plan and emergency communication strategies should be periodically tested to ensure it is effective and workable.

Following a pandemic event, the person responsible for implementation of the plan should identify learning opportunities and take action to implement any corrective actions.

VII. “Essential” Industry

As outlined in Section III, CISA has identified and provided guidance on critical infrastructure sectors that are vital to the resilience of our nation and encouraged businesses and workers in these areas to continue working. In general, construction has been deemed critical and essential, supporting several sectors. Many state and local jurisdictions have similarly deemed construction as critical infrastructure or essential. As a contractor engaged in pipeline and maintenance construction, Double H Drilling LLC falls within CISA’s guidance and is critical or essential, supporting many industry sectors. Accordingly, Double H Drilling LLC is committed to continuing operations safely.

Several States and localities have issued orders that prohibit or restrict work and travel, except for essential businesses. If upon your travel to and from the worksite, you are stopped by State or local authorities, you have been, or will be, provided a letter that you can show the authorities indicating that you are employed in an “essential” industry and are commuting to and from work.

IX. Confidentiality/Privacy

Except for circumstances in which the Company is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions will be maintained in accordance with applicable law and to the extent practical under the circumstances. When required, the number of persons who will be informed of an employee's condition will be kept at the minimum needed not only to comply with legally-required reporting, but also to assure proper care of the employee and to detect situations where the potential for transmission may increase. The Company reserves the right to inform other employees that a co-worker (without disclosing the person's name) has been diagnosed with COVID-19 if the other employees might have been exposed to the disease so the employees may take measures to protect their own health.

X. General Questions & Additional Information

Given the fast-developing nature of the COVID-19 outbreak, the Company may modify this Plan on a case by case basis. If you have any questions concerning this Plan, please contact the safety director.

Additional Information:

https://www.cdc.gov/coronavirus/2019-ncov/community/guidancebusiness-response.html https://www.cdc.gov/healthywater/hygiene/ etiquette/coughing_sneezing.html https://www.cdc.gov/handwashing/ when-how-handwashing.html https://www.arcgis.com/apps/ opsdashboard/index.html#/bda7594740fd40299423467b48e9ecf6

Appendix A - Temperature Screening Guidance

Certain local jurisdictions have recommended or required employers to conduct temperature screenings of employees as they enter the worksite. Any applicable federal, state, or local requirements on employee temperature screenings should be consulted prior to performing them. Prior to Double H Drilling LLC's implementation of a temperature screening requirement, additional information and guidance on the policy and procedures will be provided.

Options for Screening

- There are two options for how temperature screening can be conducted:
- By the employee, at home, prior to leaving for work; or
- By the employer, at the worksite, when the employee arrives to report for their shift.
- Types of temperature screeners:

- Traditional digital thermometers applied typically in the ear.

Screenings conducted by employees only at home prior to arrival at worksite.

- Infrared thermometers. If Double H Drilling LLC implements an employer-conducted temperature screening policy, infrared thermometers would likely be the type of thermometer used. The individual conducting the test will wear appropriate protective gear and provided guidance on the performance of these screenings.

COVID-19 Toolbox Talk

What is COVID-19?

The novel coronavirus, COVID-19 is one of seven types of known human coronaviruses. COVID-19, like the MERS and SARS coronaviruses, likely evolved from a virus previously found in animals. The remaining known coronaviruses cause a significant percentage of colds in adults and children, and these are not a serious threat for otherwise healthy adults.

Patients with confirmed COVID-19 infection have reportedly had mild to severe respiratory illness with symptoms such as fever, cough, and shortness of breath.

According to the U.S. Department of Health and Human Services/ Centers for Disease Control and Prevention (“CDC”), Chinese authorities identified an outbreak caused by a novel - or new coronavirus. The virus can cause mild to severe respiratory illness. The outbreak began in China, and has spread to a growing number of other countries - including the United States.

How is COVID-19 Spread?

COVID-19, like other viruses, can spread between people. Infected people can spread COVID-19 through their respiratory secretions, especially when they cough or sneeze. According to the CDC, spread from person-to-person is most likely among close contacts (about 6 feet). Person-to-person spread is thought to occur mainly via respiratory droplets produced when an infected person coughs or sneezes, like how influenza and other respiratory pathogens spread. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs. It is currently unclear if a person can get COVID-19 by touching a surface or object that has the virus on it and then touching their own mouth, nose, or possibly their eyes.

Depending on the work setting, employers may rely on identification of sick individuals who have signs, symptoms, and/or a history of travel to COVID-19-affected areas that indicate potential infection with the virus, in order to help identify exposure risks for workers and implement appropriate control measures.

There is much more to learn about the transmissibility, severity, and other features associated with COVID-19, and investigations are ongoing.

COVID-19 Prevention and Work Practice Controls & Checklist:

Employee Responsibilities

- Review and become familiar with this Plan.
- Frequently wash your hands with soap and water for at least 20 seconds. When soap and running water are unavailable, use an alcohol-based hand rub with at least 60% alcohol. Always wash hands that are visibly soiled.
- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow.
- Avoid touching your eyes, nose, or mouth with unwashed hands.
- Avoid close contact with people who are sick.
- Know the Symptoms of COVID-19:
- Coughing, fever, shortness of breath, and difficulty breathing.
- Early symptoms may include chills, body aches, sore throat, headache, diarrhea, nausea/vomiting, and runny nose. Do the same thing if you come into close contact with someone showing these symptoms.
- Employees who have symptoms (i.e., fever, cough, or shortness of breath) should notify their supervisor, healthcare provider, and stay home - DO NOT GO TO WORK.
- If in close contact with someone showing these symptoms, notify your healthcare provider and inform your supervisor.
- Sick employees should follow CDC-recommended steps. Employees should not return to work until the criteria to discontinue home isolation are met, in consultation with healthcare providers and state and local health departments, as well as the Company.
- Wear proper PPE.

General Job Site / Office Practices (Includes Additional Employee Responsibilities)

- Clean AND disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use products that meet EPA’s criteria for use against SARS-CoV-2external icon, the cause of COVID-19, and are appropriate for the surface.
- Avoid using other employees’ phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Clean and disinfect frequently used tools and equipment on a regular basis. o This includes other elements of the jobsite where possible.
- Employees should regularly do the same in their assigned work areas.
- Clean shared spaces such as trailers and break/lunchrooms at least once per day.
- Disinfect shared surfaces (door handles, machinery controls, etc.) on a regular basis.
- Avoid sharing tools with co-workers if it can be avoided. If not, disinfect before and after each use.
- Arrange for any portable job site toilets to be cleaned regularly and disinfected on the inside.
- Any trash collected from the job-site must be changed frequently by someone wearing gloves.
- In addition to regular PPE for workers engaged in various tasks (fall protection, hard hats, hearing protection), employers will also provide, where applicable:
- Gloves: Gloves should be worn at all times while on-site. The type of glove worn should be appropriate to the task. If gloves are not typically required for the task, then any type of glove is acceptable, including latex gloves. Gloves should not be shared if at all possible.
- Eye protection: Eye protection should be worn at all times while on-site.
- Some employees may be required to wear face coverings, including in those situations where (1) it is mandated by state or local rule, or (2) employees must work in proximity of six (6) feet from other employees. A face covering is a cloth, bandana, or other type of material that covers a person’s nose and mouth. The CDC lists five criteria for “cloth face coverings”: the face covering should: fit snugly but

comfortably against the side of the face; be secured with ties or ear loops; include multiple layers of fabric; allow for breathing without restriction; and be able to be laundered and machine-dried without damage or change to shape. Use of a face covering is not a substitute for other workplace preventative techniques that are outlined in this Plan.

COVID-19 Pandemic Protocols

Standards and expectations for contractors on projects

This plan is to be tested on each site for effectiveness

Double H Drilling LLC is committed to ensuring the health and safety of its contract personnel and employees, as well as the health and safety of the general public and communities near our projects. In addition to the measures you have outlined in your pandemic preparedness plan as an contractor, we require you implement the following:

Prior to Coming on Site

- Double H Drilling LLC will collect and review contractors' Pandemic Response Plans to ensure they are implementing measures like those put in place by Client to prevent infected persons from entering a work site (I.E. expectations to self-quarantine following return from foreign country or when feeling ill, etc.).
- Our pandemic disease plan consists of contacting David Burrow, who will be responsible for contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals. We will have a daily Covid check that will require each crew to document daily that temperatures and symptoms aren't indicating illness.
- Contractors who do not submit a plan or whose plans do not meet our expectations will be required to stand down until we are satisfied they have taken the appropriate corrective measures.
- We will work with contractors to ensure they have a plan to transport any personnel who exhibit signs of COVID-19 to their point of origin for treatment as opposed to using a local medical facility where possible.

Security

- At the close of business each day, secure each site completely, as if shutting down for an extended hiatus. Please be aware that sites may be shut down at the discretion of BUs.

- Every person coming to site must initially complete a site access health assessment form.

Group Size

- Minimize activities where groups of workers congregate.
- Conduct tailgates and Field Level Hazard Assessment meetings outside, maintain 6-foot (2-metre) separation between workers and have them face upwind. Keep group sizes small - Fewer than 8 people in any gathering/ meeting.

Separation/Social Distancing

- Maximize social distancing during work activities.
- Don’t double up personnel if a task can be safely completed by a single worker. (EG: Assign a single worker to complete PLC cabinet terminations. For a task like this we would want to avoid having two people in the same enclosure.)
- Practice social distancing during all work activities
- Always maintain 6-foot (2-metre) separation of workers
- Avoid personal contact (EG: handshakes).
- Assign a social distancing coordinator (Craft Inspector and contractor representative) to monitor social distancing at all times.
- Adjust work planning to maximize social distancing between workers, teams and site personnel
- For activities and tasks where social distancing cannot be safely maintained between workers, conduct assessment and implement proper hazard controls
- Don’t allow workers to congregate in close-proximity areas such as trailers, smoking areas, etc.
- Have workers maintain social distancing during breaks. (E.G.: take lunch breaks for lunch in their vehicles or away from one another, avoiding large groups.)
- Have the foreman/straw present the FLHA. Require discussion and participation, have foreman/straw sign everyone in. Take picture of all who are signed in and date stamp.
- Set up onboarding rooms to maintain 6-foot spacing between participants. Employees will be trained on health issues of Cvid-19 to include prevention of illness, initial disease symptoms, preventing the spread of the disease, and when it is appropriate to return to work after illness. Double H Drilling LLC has implemented

a disease containment plan and it should be carried out by all employees.Our mitigation plan will be discussed every morning in the JSA.

- There will be daily cleaning of all work surfaces and things that have frequent hand contact.
- If at any time a Double H Drilling LLC employee or family member has contracted the virus, they are encouraged to stay home. We completely understand that these times are pressing. Contact David Burrow if you need to be given flexibility due to the pandemic. Our office staff and non-essential workers will be able to utilize their work from home if there is ever the need. We will also give paid time off to those who choose to get the vaccine when it is made available.
- If we are impacted by an outbreak within the company we will take proper precautions to isolate the spread of the virus. First, contact David Burrow. Then, inform the Project Superintendent for the client, and any of our subcontractors and suppliers. We will utilize our prevention program at that point. David Burrow will continue to maintain communication with Client until the incident is isolated and Double H Drilling LLC has returned in a full capacity. Following any isolation or possible outbreak we will conduct a stand down meeting to discuss our handling of the outbreak and any changes that need to be made as a team. We Are In This Together!

Documentation

- Have a single person manage JSA and Work Permits who will list the names of the workers. Do not pass the pen and permit books around.
- Have workers complete and sign their course verification of understanding document and leave them on their desks. Have individual managing documentation photograph each document and then dispose of paper documents using universal precautions.

Cleaning

- Have each work crew define sanitation needs and implement appropriate protocol using the Generalized Deep Cleaning Guidelines for their work site based on crew size and activity, as part of their Project Hazard Assessment.
- Have workers sanitize hand tools and equipment controls using appropriate disinfectants before and after use.
- Encourage regular/frequent washing frequently. Especially arriving onsite, after bathroom and before eating

- Have workers use hand sanitizer when entering and exiting a room being utilized for onboarding.
- Issue new pens for onboarding and allow workers to keep their own pen. Do not share pens.

Additional Measures

- Extend requirements of contractors to verify details of deep cleaning protocols with their Accommodations Providers (i.e. camps, hotels, motels, air B&B, leased accommodation, etc.).
- No smokeless tobacco usage onsite.

23.0 Personal Conduct - Worker Violence

- **23.1** Workplace violence or harassment will not be tolerated. Any employee engaging in workplace violence or harassment will be disciplined or terminated at Double H Drilling LLC’s discretion.
- **23.2** Workplace violence is any intentional conduct which is sufficiently severe, offensive or intimidating to cause an individual to reasonably fear for his or her personal safety or the safety of his or her family, friends and/or property such that employment conditions are altered or a hostile, abusive or intimidating work environment is created for one or several employees. Examples of workplace violence include, but are not limited to, the following:
- Threats or acts of violence occurring in the workplace, regardless of the relationship between the parties involved in the incident.
- Threats or acts of violence occurring outside of the workplace involving someone who is acting in the capacity of a representative of the Company.
- Threats or acts of violence occurring outside of the workplace involving an employee if the threats or acts affect the business interests of the Company.
- All threats or acts of violence occurring outside of the workplace of which an employee is a victim if we determine that the incident may lead to an incident of violence in the workplace.
- Threats or acts resulting in the conviction of an employee or agent of the Company or of an individual performing service for the Company on a contract or temporary basis, under any criminal code provision relating to violence or threats of violence which adversely affects the legitimate business interests of the Company.

- Threatening physical or aggressive contact directed toward another individual.
- Threatening an individual or his/her family, friends, associates, or property with harm.
- The intentional destruction or threat of destruction of Company or another's property.
- Harassing or threatening phone calls.
- Surveillance.
- Stalking.
- Veiled threats of physical harm or like intimidation.
- Communicating an endorsement of the inappropriate use of firearms or weapons.
- **23.3** The prohibition against threats and acts as described above applies to all persons involved in the operation of the Company, including, but not limited to, Company contract and temporary employees and non-employees on Company property.
- **23.4** Double H Drilling LLC prohibits sexual harassment and harassment because of race, color, sex, national origin, religion, disability, age, genetic information, or any other protected category. All such harassment is prohibited. Our anti-harassment policy applies to all persons involved in our operations and prohibits harassment by any employee of the Company, including shareholders, managers, and coworkers, as well as customers, vendors, and subcontractors.
- **23.5** Any employee who believes that he or she has been harassed or discriminated against by a coworker, supervisor, agent, client, vendor or customer of the Company, or who is aware of or has witnessed the harassment or discrimination of others, must immediately provide a written or verbal report to his or her supervisor, the President, or any other member of management. The Company will endeavor to protect the privacy and confidentiality of all parties involved to the extent possible, consistent with a thorough investigation.
- Retaliation is prohibited against any person by another employee or by the Company for using this complaint procedure, reporting a violation of the equal employment opportunity policy, reporting harassment, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency.

23.5 No provision of this policy statement or any other provision in this policy shall alter the at- will nature of employment with Double H Drilling LLC We will make the sole determination of whether and to what extent, threats or acts of violence will be

acted upon by the Company. In making this determination we may undertake a case-by-case analysis to ascertain whether there is a reasonable basis to believe that workplace violence has occurred.

24.0 Personal Conduct - Substance Abuse

- **24.1** The use or possession of alcoholic beverages or controlled substances while on company property, or in any company vehicle, or on company time, including breaks or lunch, paid or unpaid, on any shift, is strictly prohibited. A covered employee shall be prohibited from reporting for duty or remaining on duty requiring the performance of covered functions while under the influence of alcohol or controlled substances.
- The Company shall prohibit a covered employee from using alcohol within 4 hours prior to performing covered functions, or, if an employee is called to duty to respond to an emergency, within the time period after the employee has been notified to report for duty. If the company has actual knowledge that a covered employee has used alcohol within 4 hours prior to performing covered functions or within the time period after the employee has been notified to report for duty, the employee shall not be permitted to perform or continue to perform covered functions.
- The company shall prohibit a covered employee who has actual knowledge of an accident in which the covered employee’s performance of covered functions has not been discounted by the company as a contributing factor to the accident, from using alcohol for eight (8) hours following the accident, unless the covered employee has been given a postaccident test under DOT or PHMSA regulations, or that the company has determined the covered employee’s performance could not have contributed to the accident from performing or continuing to perform covered functions.
- **24.2** The company has implemented the Pipeline and Hazardous Materials Safety Administration, Department of Transportation Drug and Alcohol Testing Regulations as set forth in 49 CFR Part 199.
- **24.3** Double H Drilling LLC will test their employees or contractors for prohibited drugs to test under the following work-related conditions:
- Pre-Employment
- Post-Accident
- Random
- Reasonable Cause

- Return-to-Duty
- Follow up
- **24.4** Compliance with this drug and alcohol testing plan is a condition of employment. Refusal to take a required drug test or failure of a drug test may result in immediate termination from employment. Refusal to submit to a post-accident, reasonable suspicion or follow-up alcohol test shall result in the covered employee not being allowed to perform or to continue to perform any covered functions.

24.5 Individuals Subject to Drug and Alcohol Testing: Any applicant/ employee who would perform on a pipeline, an operating, maintenance, or emergency response function regulated by Part 192, 193, or 195, would be subject to drug testing under this program.

25.0 Personal Conduct - Fatigue Management

25.1 Rest is the most important control measure for managing fatigue. Double H Drilling LLC is committed to providing all employees with an adequate amount of time away from the immediate work environment to allow workers to recover from fatigue. To ensure adequate rest, Double H Drilling LLC will also provide the following work accommodations:

- A minimum of 8 resting hours in between work shifts.
- A minimum of one lunch break equaling 30 minutes or more in an 8-hour work period.
- Provide fresh, adequate, readily available drinking water on site for all employees.
- Provide additional short breaks as needed, especially during strenuous work activities, as considered necessary by site supervisors.
- Field work past dusk should be limited, and operational management must be aware.
- Provide job rotations for employees conducting repetitive tasks.
- Provide ergonomic tools and equipment, as appropriate, such as the use of lifting devices for employees performing repetitive lifting motions.
- Allowing sit breaks when necessary.
- **25.2** In the event of Fatigue and/or Stress being identified as a significant safety issue at a work site, alternative duties will be sought for affected worker(s). If no

alternative duties exist, the worker will be relieved of work duties and a rehabilitation plan developed.

- **25.3** All Personnel are responsible to:
- Show up fit for duty at the commencement of and during the designed work period.
- If not fit for duty, notify your immediate supervisor to ensure that appropriate risk mitigation processes are implemented.
- Employees in safety critical positions must immediately report fatigue, tiredness, and lack of mental acuity to supervision, as well as supervisory personnel to make safety critical decisions and take appropriate actions to prevent loss.
- Self-monitor as well as provide monitoring, for team members and co-workers for signs and symptoms associated with fatigue.
- Communicate and report personnel fatigue issues to the immediate supervisor.

25.4 Supervisors are responsible to:

- Ensure that persons under their control are aware of, and comply, with fatigue management practices.
- Ensure that work schedules comply with fatigue management practices.
- Monitor personnel for the signs and symptoms of fatigue.
- Approve and implement controls designed for managing fatigue.
- Comply with Double H Drilling LLC’s Fatigue Self-Management Plan.

26.0 Personal Conduct - Fit For Duty

- **26.1** Fitness for duty evaluation is performed during operator qualification testing. Each candidate for operator qualification must be able to perform the task under review without physical struggling.
- **26.2** Only qualified individuals will perform covered tasks.

27.0 Personal Conduct - Medical Clearance

- **27.1** Any personnel having contact with COVID-19 infected persons or that has developed probable COVID-19 flu-like symptoms or tested positive for COVID-19 must obtain a medical clearance before returning to a Client's worksite.
- **27.2** The medical clearance must be documented on the "COVID-19 Medical Clearance to Return to Worksite or Facility". Completed forms must be emailed to doublehdrilling@gmail.com. Workers may return to work once approval is received from the Double H Drilling LLC Occupational Health Nurse.

28.0 Personal Conduct - Smoking / Tobacco Policy

- **28.1** Tobacco use shall be prohibited in or near any excavation.
- **28.2** Smoking shall be prohibited on any Client's worksite except in smoking areas designated by Client.

29.0 Personal Conduct - Progressive Discipline

29.1 The company reserves the right to administer discipline in the manner it feels necessary for the successful conduct of its business, up to and including, termination as a first and final action when the events so warrant.

29.2 Upon violation of any company safety rule, the violating employee will be penalized. The severity of the penalty will be commensurate with the nature of the safety violation.

- First Offense - Documented Verbal Reprimand The manager or supervisor will conduct a discussion of safety infraction(s) with the employee. This discussion will take place as soon as possible after the supervisor has knowledge of the safety misconduct. A written documented record of the discussion, which will include a review of the Safety Policy and retraining, will be signed by the employee, and placed in the employee's personnel file,
- Second Offense - Written Reprimand Written documentation of the safety infraction(s) will be prepared by the human resource manager or safety manager and presented to the employee to be signed. A written record of the discussion will be signed by the employee and placed in the employee's personnel file. The employee will receive a plan for Improvement and required additional retraining of the safety procedures.

- Third Offense - Suspension - One Day - The One-day suspension without pay and a management review is used when further time is required to investigate a serious incident in which the employee was allegedly involved. This should only be initiated with the concurrence of the President. In many cases this step will be skipped. A written record of the discussion will be signed by the employee and placed in the employee’s personnel file.
- Fourth Offense - Dismissal / Termination Review - There will be a review of the employees employment by Management, Safety and Human Resources regarding the permanent separation of an employee from the company, initiated for disciplinary reasons, and/or safety misconduct. Written documentation of the discussion will be placed in the employee’s personnel file.
- Termination - Management reserves the right to terminate the employment of any employee at any time for violation of company policies.

30.0 Personal Conduct - Short Service Employees

30.1 An employee is considered a “Short Service Employee” if he/she has less than 6 months of employment within Double H Drilling LLC.

30.2 A short service employee may not work alone until they are qualified and knowledgeable on the tasks assigned. Under no circumstances shall the ratio of qualified to non-qualified individuals exceed 1 qualified to 3 non-qualified. Double H Drilling LLC will meet the requirements of their individual clients. (Example: crew sizes less than 5 shall have no more than 1 short service employee).

30.3 A mentor will be assigned to one crew at a time and must remain on site with Short Service Employees.

- A mentor must be with the company at a minimum of 6 months, and not have any recordable incidents attributed to him/her within the past twelve months.
- A mentor should be willing to teach and guide the Short Service Employee in the company safety and OQ policies, demonstrate a positive work ethic, and teach with hands on skills and positive behavior skills.
- Report any difficulties to the Short Service Employee’s supervisor.

30.4 Short Service Employee Identification
Short Service Employees shall wear a green hard hat while performing field work unless a client or site-specific requirement mandates another identification method. See Section 52.0 for the complete Green Hard Hat Identification requirements.

31.0 Radiographic Operations (Gamma Ray or X-Ray)

- **31.1** Double H Drilling LLC does not offer radiographic services. Any radiographic services subcontracted to perform work on a Client’s worksite shall be fully licensed to operate in the jurisdiction where the worksite is located.
- **31.2** Double H Drilling LLC will monitor any subcontracted radiographic services to ensure the safety of all personnel on the worksite.

32.0 Slips & Trips, Sprains & Strains - Safe Lifting Program

- **32.1** Before manual lifting is performed, a hazard assessment must be completed. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if twoman lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried.
- **32.2** To minimize the likelihood of a back injury when lifting materials, the following steps should be taken:
- Plan ahead before lifting. Know what you're doing and where you're going to help prevent you from making awkward movements or turning awkwardly while holding a heavy object.
- Clear a path, and if lifting something with another person, make sure both of you agree on the plan.
- Stand close to the load with your feet spread apart about shoulder width. Place one foot slightly in front of the other for balance.
- Bend at the knees. Squat down bending at the knees (not your waist). Tuck your chin while keeping your back as vertical as possible.
- Control the load. Get a firm grasp of the object before beginning the lift.
- Lift with your legs. Begin slowly lifting with your LEGS by straightening them. Never twist your body during this step.
- Keep Load Close to Body. Once the lift is complete, keep the object as close to the body as possible. As the load's center of gravity moves away from the body, there is a dramatic increase in stress to the lumbar region of the back.
- If you must turn while carrying the load, turn using your feetnot your torso. Keep your eyes up. Looking slightly upwards will help you maintain a better position of the spine.

- When moving an item from a hard-to-reach place, position yourself as close to the item as possible. Slide it out to get it closer and be sure that you have adequate room for your hands and arms. Be aware of adjacent obstructions, on either side or above the load.
- Try to allow yourself as much room as possible to set the load down. You can always shift it slightly later.

33.0 Traffic / Equipment Hazard - Heavy Equipment

Awareness / Spotters

- **33.1** Wear high-visibility clothing when working around heavy mobile equipment.
- **33.2** Avoid positioning yourself in a blind spot or riding on moving equipment.
- **33.3** Avoid setting up a work area near heavy mobile equipment.
- **33.4** Avoid walking or working under a suspended load.

33.5 Make eye contact with and alert the operator - and ensure the operator sees you - before approaching a vehicle.

- **33.6** Ride only in approved seats and wear a seat belt.
- **33.7** Spotters must be trained in hand signals.
- **33.8** Spotter must provide safety guidance and communication between the operator, workers, and nearby pedestrians to compensate for blind spots.
- **33.9** Spotters must wear high-visibility clothing and stand clear of equipment, so they are always visible to the operator.

34.0 Utility Hazards - Working Near Power Lines

34.1 Personnel performing work in the vicinity of overhead power lines or exposed energized conductors shall not approach nor permit equipment or objects to approach the power line or conductor closer than the safe limit distance specified below:

Voltage	Minimum Distance (Feet)
Less than 50,000 volts	10
50,000 to 120,000 volts	15
120,000 to 250,000 volts	20
250,000 to 350,000 volts	25
Greater than 350,000 volts	30

When working under overhead lines, clearance distance must be provided, or lines shall be de-energized and grounded.

34.2 The following controls shall be implemented for any heavy equipment work near power lines:

34.2.1 Signage - signage shall cover three parts of the view plane:

- High (e.g. ribbon tied to overhead goal posts),
- Medium (e.g. “Beware of overhead lines” sign at eye level) and
- Low (e.g. cones on the ROW).

34.2.2 Physical Barriers:

- A non-conductive barrier (e.g. goal posts with rope extending across the ROW) set outside the limit of approach (these limits vary by jurisdiction and voltage) on both the up- stream AND downstream sides.

34.2.3 Dedicated Spotter - a trained, dedicated employee, not engaged in any other duties (e.g., swamping) while performing spotter duties. Their task is to monitor and direct traffic around lines, and shall use an appropriate audible alarm (air horn for example) to warn the driver of potential danger.

Employees are responsible for possessing a valid driver’s license for the type of motor vehicle they operate.

35.0 Driver Safety Program (on/off road, ATV)

35.1 Expectations of all drivers;

- All drivers, including those who are not required to have a CDL, must pass a drug and alcohol test upon hire.
- Only authorized Double H Drilling LLC employees will drive a motor vehicle in the course and scope of work, or operate a company owned vehicle. All drivers of Double H Drilling LLC owned vehicles must always maintain a valid and insurable driver’s license.
- Only authorized persons are allowed to drive Double H Drilling LLC owned vehicles. “Authorized drivers” are those approved by Double H Drilling LLC management and whose name appears on the Double H Drilling LLC approved driver list as submitted to Double H Drilling LLC’s insurance carrier. Special authorizations may be obtained, in writing, from Double H Drilling LLC Owner or designee thereof.
- Drivers are required to report all prescription drug use immediately to the Human Resource Manager, prior to operating a Double H Drilling LLC owned vehicle for both safety and insurance reasons.
- Drivers of Double H Drilling LLC owned vehicles must notify the Safety Manager of any of the following within 24 hours of the occurrence: o An action of a court or the Secretary of State’s office suspending, revoking, or o restricting driving privileges. o Any reckless, drunk or impaired driving conviction, on or off duty, whether or not a company vehicle was involved.
- Any traffic citation involving a company or personal vehicle.
- Drivers of Double H Drilling LLC owned vehicles must notify the Safety Department of any collision or other damage to a company vehicle immediately.
- Only employees or other authorized individuals are to ride in Double H Drilling LLC owned vehicles unless the vehicle has been assigned for 24-hour use.
- Any individual who has been given possession of a company vehicle for usage 24 hours a day, 365 days per year, must provide proof of insurance for any car titled in their (or their spouses) name.
- Any personal use, including mileage to and from work, must be recorded annually in a mileage log and given to Double H Drilling LLC Accounting or designee thereof.

Employees are strictly prohibited from operating a motor vehicle while under the influence of drugs or alcohol. This includes: a) blood alcohol level at or above the local legal limit; b) illegal drugs; and c) prescription medications that cause drowsiness or

other conditions that may cause impairment. Employees taking prescription medication that may impact their safety shall report this to their supervisor.

- Charges to Double H Drilling LLC that are a consequence of poor motor vehicle operator judgment will be split on a 50/50 basis with vehicle operator.
- Drivers shall not operate a motor vehicle while under the influence of alcohol, illegal drugs, or prescription or over the counter medications that might impair driving skills.
- Company vehicles are to be used for Company Business only. Company vehicles shall not be used for personal use unless by advanced written permission. Company credit cards shall not be used to pay for fuel for employee personal use of company vehicles. It is the responsibility of the employee to account for the fuel usage and of this mileage and pay the proportionate share of the fuel out of their own pocket.
- If the company discovers the employee is not honoring this arrangement, the company will levy a charge of $0.50 per personal mile, deducted from the employee’s paycheck for estimated fuel and wear and tear on the Company vehicle. This rate is subject to change at the Company’s sole discretion at any time. If the employee does not wish to pay the stated rate, the employee will lose the privilege of using the Company vehicle for transportation to and from their residence.
- Drivers of Double H Drilling LLC Vehicles will complete an Double H Drilling LLC Vehicle Inspection weekly These are due every Monday. A Vehicle Inspection is due when changing vehicles as well. Assigned vehicles are to be locked when not in use, especially overnight. Upon returning and parking the vehicle at the Double H Drilling LLC abase of operation at the end of the mob or end of a week, or overnight, the key for the assigned vehicle will be left in the specified designated location within the Double H Drilling LLC buildings or fences.
- Double H Drilling LLC Equipment is not to be left in the vehicle over an extended period of time (i.e. Weekend) unless that vehicle is parked inside of the building.
- **35.2** Expectations of Drivers with a Commercial Driver’s License;
- Drivers maintaining a Commercial Driver’s License (CDL) will be expected to comply with Department of Transportation (DOT) regulations:
- Employees are expected to follow all traffic laws and rules of the road while on company business.
- An annual review of the driver’s record will be conducted.

- Motor vehicle incidents occurring while on company business must be reported. Emergency services should be called (if necessary), and the incident should be reported to the insurance company and the employee's supervisor.
- Bi-annual medical test reviews will be conducted. A medical certification must be complete, valid and available whenever driving a company vehicle or operating company equipment.
- Drivers must update or renew all expired licenses prior to the expiration date.
- Random drug and alcohol testing will be conducted under the existing Double H Drilling LLC program.
- Defer to Federal and State Laws.
- **35.3** Authorized drivers will report vehicle accidents, no matter how insignificant to the Safety Department, and their supervisor immediately, unless medically unable to do so. The Safety Department will notify Management and Maintenance.
- **35.4** If you are involved in a Vehicle Accident:
- Check to see if anyone is injured in the vehicle you are driving.
- If so, Call an ambulance - dial: 911
- Notify Police
- Notify Double H Drilling LLC Safety
- Complete Vehicle Accident Report form and email to the Safety Department.
- Do not discuss accident details with anyone except police or authorities investigating the accident.
- Obtain Police Report number and contact information.
- If required by Human Resource Manager, and as allowed by DOT and OSHA, obtain Drug and Alcohol tests as soon as possible, within 1 hour. Locations are provided by the Human Resources Department or Safety Department.
- Contact Maintenance with location of towed vehicle and to obtain rental vehicle information.
- If you or another person in your vehicle is injured and must be taken to the hospital and you have been released from the scene by the Police Department:
- Do not leave employee at hospital alone, until you are released by management.

- Authorized drivers will report any collision or traffic violation while driving on company time to the appropriate Double H Drilling LLC personnel within one hour of the occurrence.
- Any cargo on or in motor vehicles must be adequately stored and secured to prevent unintentional movement of the equipment which could cause spillage, damage to the vehicle, or injury to the operator.

35.5 Vehicle Maintenance

At a minimum a Vehicle Inspection report shall be completed and forwarded to the Safety Department by Monday of each week.

- An Inspection report should be completed every time you use a different vehicle, turn a vehicle back into the fleet, or have a maintenance issue as well as the minimum of once a week by Monday.

Pre-use inspections should be performed before operating a vehicle. This consists of a walk-around the vehicle to check for any defects to the vehicle and ensure there are no barriers blocking the path. Companyowned vehicles shall have a maintenance program in place meeting the minimum manufacturer's recommendation.

In the event employees are driving personal vehicles for company business, pre-use inspections and regular vehicle maintenance must still be completed.

- The Fleet Coordinator will receive copies of the affected Vehicle Inspections for necessary repairs and or maintenance. Do not operate a vehicle that is not safe.
- Vehicles are to be kept clean and free of debris inside and out.
- Requested maintenance repairs are to be reported to Fleet Coordinator who will obtain approvals and assist in the location of a repair facility. Fleet Coordinator will assist with rental vehicles, tow truck or other necessary items.
- Oil changes are to be completed every 3,000 to 5,000 miles depending upon the type of vehicle.

35.6 Loads

- Loads shall be secure and shall not exceed the manufacturer’s specifications and legal limits for which the vehicle was designed
- Vehicles will be used for its intended purpose only.
- **35.7** Only the manufacture’s specified capacity of passengers are allowed to ride in a vehicle. Seat belts are to be worn by all passengers.
- **35.8** Texting and driving is expressly forbidden.

- **35.9** Cell phone use while driving is illegal for anyone driving commercial vehicles over 10,000 pounds, unless using a hands-free set.
- Seat belt use is mandatory for the driver and passengers while the vehicle is in operation.
- **35.10** Off Road Vehicles and snowmobiles are used as transportation tools. To help prevent the loss of control when operating these motorized machines, the driver should follow and apply the following:
- Operators are required to complete a video training course.
- Read the owner’s manuals and know the controls.
- Must be 18 years of age and have a valid driver’s license to drive any off road vehicle.
- If the job requires an extended period of time away from the vehicle, the employee should carry a hand-held radio/cell phone with him.
- Do not drive too fast for the conditions and be alert for environmental changes and situations (terrain, animals, road conditions and weather).
- Know the limits and capabilities of the equipment.
- Have foresight to anticipate and prepare for the situations ahead.
- Make good judgments -knowing that there are always alternatives.
- Develop your operating skills.

35.10.1 Precautions and Safe Work Practices

- Always wear a helmet, face shield or goggles and gloves.
- Always wear the proper clothing for the weather conditions.
- Inspect the ORV/snowmobile before riding.
- Wear seatbelts when provided.
- When provided always use the cab nets.
- Keep feet on footrests.
- Slow down when approaching a bend and lean into the turn.
- Avoid locking up the brakes.
- Under no circumstances should there be more than one person on a snowmobile.

- Carry only the tools and supplies needed to complete the job at hand and be sure to fasten all items securely to the ORV/snowmobile.
- Only use the ORV/snowmobile for their intended purpose -to carry out your job functions.
- Do not shift gears when traveling up a hill or on a steep incline.
- If you need to leave the vehicle always set the parking brake.
- Respect the property of others and if necessary, get permission to travel on the property from the landowner.
- Never operate any kind of vehicle or equipment when consuming alcohol or drugs.
- Never under any circumstances-speed or drive reckless.
- Have proper and up to date ORV stickers on the ORV.

35.10.2 Loading, Unloading and Transporting

- Always use approved ramps for loading and unloading. (not boards)
- Have the ramps attached to the truck/trailer with hooks or cables to prevent the ramps from kicking out when loading or unloading.
- If a bank or dock is available, back the truck/trailer up against it and use the bank/dock for loading/unloading the ORV/snowmobile.
- Secure the ORV/snowmobile in the back of the truck by fastening the front and back of the vehicle with nylon ratchet type straps.

36.0 Working Alone - Travel Planning Program

- **36.1** Double H Drilling LLC management will plan travel to and from job sites.
- **36.2** The means of travel will accommodate the personnel and equipment needed at the job site.

36.2 Adequate time will be allotted to safely travel the distance required. For extended distance travel the plan should allow for rest periods and overnight accommodations when needed.

36.3 Check-in times/methods will be planned (Section 38 of this document) to verify employee safety and arrival. Check-ins will be a minimum of once per day.

37.0 Working Alone - Self Rescue Program

37.1 The self-rescue process involves three steps: recognizing the threat; an awareness of “certain” verses “potential” harm and taking action to remove yourself from the life threatening circumstances.

ª Threat recognition: The ability to recognize threats to your life is based on the knowledge and experience acquired over a lifetime. The ability to recognize those situations that place you in harm’s way can also be learned from other, more experienced, people and by attending training programs that teach threat recognition. Nowhere does the need to be able to recognize danger apply more than when you venture into the outdoors. Being able to recognize warning signs enables you to see what’s coming and then step back from the brink before the hazards threaten your life. Threats to your safety might include inclement weather, dangerous terrain, wild animal attack and many other circumstances.

- Certain verses Potential harm: Be able to differentiate between those situations that are going to affect you right now, and those that are not as immediate, but will still have to be confronted. Certain harm, for example, is finding yourself in a crashed plane that will explode when the ruptured fuel tank ignites. Potential harm, on the other hand, could be the onset of inclement weather later in the day or the lack of water in an arid area.
- Taking Action: When faced with a sudden, life-threatening situation, any immediate action in the direction of safety is better than deciding on the best action that comes too late!

37.2 The Steps to Self-rescue:

37.2.1 Immediate-Threat Recognition and Action:

- When your life’s on the line you must act immediately. Assuming you can extricate yourself from the event that precipitated the crisis situation, your first step is to deal with any life-threatening medical conditions. That includes your medical condition and the medical condition of any others.
- Take care of yourself first. Are you bleeding severely? If so, that needs to be taken care of quickly, using first aid. Next, check the accident scene to locate other people who may need immediate help.
- Is the site safe? Do you need to move to a safer area? Once you have control of the medical issues and area safety, then you can sit back and catch your breath.

37.2.2 Do Not Panic:

- Out-of-control panic must be avoided. The steps you take to protect yourself from this moment on can make a huge difference in the final situation outcome. Recognize the threats to your safety and then either remove yourself from the situation or remove the threat. As dangerous as things can become, you are seldom in a situation where you can’t take just a second or two to think before you act. But you must “act.”

37.2.3 Make A Tentative Plan

- At this point, it is very important to be totally honest with yourself and develop a realistic plan with a high likelihood of success. It is very easy to allow the desire for comfort and companionship to override what may be a better decision - stay where you are.
- Do you know where you are relative to the availability of help? What time of day is it? Is it too late to try to walk out today? Would it be better to hole-up for the night and re-evaluate the situation in the morning? Be patient and allow yourself to be rescued rather than attempting to rescue yourself - it’s safer.

37.2.4 Step-By-Step, Plan Your Moves

- At least, plan the first few moves because you might not be able to see the entire journey. Decide what you are going to do and when you are going to do it. Is your physical condition such that you can safely accomplish the overland travel you are planning? If it is, do you have the clothing you need to protect yourself from the weather conditions that exist?
- Do you know where you are going? Do you have the energy that you will need to get to your destination? Do you have the navigation equipment you need to reach that destination safely? If you can answer all of these questions in the affirmative, without letting wishful thinking cloud your decision-making ability, then your next step is to:

37.2.5 Plan Contingencies

- Make alternative plans for foreseeable problems. Anticipate the problems that might arise as you rescue yourself. These problems may include changes in the weather, rougher terrain than you expected, heavy vegetation, overestimating your ability to negotiate the terrain you encounter and other issues. By thinking ahead, you may already have a solution to the predicaments you may face.

37.2.6 Execute The Plan In Your Head

- Before you start, walk through your plan step-by-step. Review each stage of the plan objectively, realistically and with an eye for anything you may have forgotten.
- Ask yourself: “Can I really do this or is it my impatience and desire to be back with my family that is making me want to “get home?”
- If you can’t “do” the plan in your head it won’t work on the mountain! Revise your plan. Find alternatives to those parts of the plan you have doubts about and when you are comfortable with it:

37.2.7 Execute The Plan

- When all is in order put your plan into action.
- Do not let the concerns of others, the promises you made to be home by a certain time, the desire to go-for-help or any other issue influence your choice of action. Your decision to self-rescue should not be driven by panic or an overwhelming desire just to “get-out-of-here!

37.3 Deciding to self-rescue must be based on a thorough, comprehensive, objective review of your situation. In the final analysis, even if it looks like you can “do-the-plan” the best choice might still be to sit tight and let the rescuers come to you.

38.0 Working Alone - Call-in Procedure

38.1 Management will initiate a call-in plan for any lone workers.

38.2 Call-in may utilize any technology that facilitates communication between the lone worker and management. Cell phones should be used when service is available. In the absence of cell phone service, satellite phones or GPS texting services should be used.

38.3 A call-in schedule will be established commensurate with the risks involved with the job site and task being performed. Contact with lone workers will be once per day at a minimum.

38.4 Lone workers will initiate contact with management according to the schedule and method specified in the management established call-in plan.

38.5 In the event of a lone worker not meeting the call-in schedule, a search and rescue effort will be launched when the communication is more than 4 hours late.

39.0 H2S Hydrogen Sulfide Safety Program

39.1 In the event that H2S is present (either prior to the start of work or discovered during an ongoing project) all work by Double H Drilling LLC personnel will stop and employees will evacuate the area.

39.2 In the event exposure has occurred employees are to immediately remove themselves form the area. Remove clothing which may have been contaminated. Wash exposed skin with water.

39.3 At no time should rescue attempts be made by untrained, unqualified persons. H2S environment entry requires properly trained and equipped persons with adequate backup personnel.

39.4 Annual training of all personnel will be conducted to establish general awareness level knowledge of hydrogen sulfide and exposure potentials.

40.0 Emergency Response Plan

40.1 In the event of an emergency, this plan describes the responsibilities and actions that need to be taken to protect all employees until the appropriate responders arrive.

40.2 The Double H Drilling LLC job supervisor or ranking lead person shall act as the Emergency Response Coordinator (ERC).

40.3 The Emergency Response Coordinator will assess the situation and initiate a response action. The ERC will direct personnel in the actions needed to mitigate the situation or to keep all personnel safe.

40.4 All Double H Drilling LLC personnel should evacuate the area in the event of a fire or other emergency where the employee’s safety would be compromised.

40.5 In the event of an evacuation, all personnel must gather at the muster point designated by the client. In the event there is no designated muster point, all personnel must gather at a point up- wind of the evacuated area. All personnel must be accounted for at the muster point. If any personnel are missing, the first responders must be notified.

40.6 Report the emergency by calling 911. If phone service is not available, use the satellite based technology to report the emergency.

40.7 In the event of personnel injuries, administer First Aid if possible.

40.8 Notify the client of the nature and status of the emergency if there is no client representative on site.

40.9 Take photographs of the area if possible without endangering any personnel or delaying response efforts.

- **40.8** Notify Double H Drilling LLC management of the nature and status of the emergency.
- **40.9** Complete an incident report form as soon as it is possible and safe to do so.

41.0 Project Hand Protection Specification

41.1 Hand protection shall be worn at all times on Client's worksites. Hand protection shall be based on the hazard assessment, appropriate to the task being performed, and include consideration of factors such as abrasion, dexterity, punctures and sharp edges, chemicals, crushing, temperature (hot and cold), vibration and general duty. As a general rule, anytime standard PPE (Hardhat, safety glasses, high-vis vest, safety boots) is donned gloves must be worn. All supervisors and managers are responsible for ensuring that all employees under their charge are in compliance with this policy.

41.1.1 The single exception to this rule shall be that when it is deemed necessary to remove gloves for an administrative task while on the ROW, or to operate an instrument where fine dexterity is needed and the risk of injury to hands is not reasonably present; protective gloves may be temporarily removed. It is expected that workers will have the gloves with them and be prepared to don them while not executing the exempted task.

41.2 Gloves as a minimum must:

- Permit moderate dexterity, or better;
- Contain at a minimum, impact absorption material on backhand, knuckles and fingers; • Contain palm and finger materials made of or coated with grip promoting material; • Be 'impact rated' by the manufacturer or contain EN388 Impact Protection rating.
- The puncture resistance rating must be commensurate with the anticipated highest likely puncture hazard determined by the Contractor hazard assessment.

41.3 Protective Gloves Specification

This section contains information on other types of gloves permitted based on the type of task and determined by the hazard assessment.

Mechanical Protection

- Cut Resistance: All gloves used by workers on the project shall meet the minimum specification:
- ANSI/ISEA 105-2016 Standard CUT Level A5, or; o EN388 2016 Standard Rating Level E/ Level 5 (Coup test, pre-2016).

Impact Protection:

- All general work gloves used by workers on the project, where fine dexterity, live electrical work, chemical, or heat protection are not a factor must contain impact protection.

Impact Protective Gloves must:

- Permit moderate dexterity, or better.
- Contain at a minimum, impact absorption material on backhand, knuckles and fingers.
- Palm and finger materials are to be made of or coated with grip promoting material.
- Be ‘impact rated’ by the manufacturer or contain EN388 Impact Protection rating.
- The puncture resistance rating must be commensurate with the anticipated highest likely puncture hazard determined by the Contractor hazard assessment. Puncture Resistance: Generally, protective gloves meeting the minimum cut resistance specification will have inherent puncture resistant qualities.
- When puncture-type hazards are identified by the contractor’s hazard assessments(s) or are apparent at the workface, a glove that is puncture resistant rated by the manufacturer is required.
- The puncture resistance rating must be commensurate with the anticipated highest-likely puncture hazard determined by the contractor’s hazard assessment.
- If undetermined by the contractor’s hazard assessment, all gloves with EN 388 markings, puncture resistance must be at a minimum rated a Level 3 or higher. This rating is also adopted and harmonized by ANSI ISEA for ease of administration. Abrasion Resistance:
- Similar to puncture resistance, protective gloves meeting the minimum cut resistance specification (A5/ Level E) are comprised of abrasion resistant qualities, often rated at EN388 Level 4. The minimum abrasion resistance of gloves must be EN388 Level 4.

Chemical Protection Chemically Impervious Gloves- Glove ratings must be commensurate with the highest anticipated chemical hazard determined by the appropriate SDS' and by the hazard assessment.

- Administrative controls must be identified to determine duration of worker exposure and suitability of gloves to remain effective for this duration.
- Chemically impervious gloves must be paired with a liner that meets cut resistance specifications. Thermal Protection The hazard assessment must contain identified hazards and control measures for known or potential exposure to this energy source. At a minimum, the gloves must provide adequate worker protection from the highest anticipated temperature or hazard.
- For welders, gloves must provide suitable protection from heat, flames, sparks, and weld spatter.
- For welding, the primary consideration will be worker protection from thermal/welding hazards. Welders are not required to meet mechanical hazard protective glove specifications unless the contractor's hazard assessment has deemed it necessary.
- Thermal protection gloves must contain a minimum 5" cuff for coverage and protection of wrists. Electrical Protection (Potential for Energized Contact) Voltage Rated Gloves- the contractor hazard assessment must contain identified hazards and control measures for known or potential exposure to this energy source. At a minimum, the gloves must provide adequate worker protection from the highest anticipated electrical hazard.
- Voltage Rated Gloves must be worn that are the appropriate class for the voltage.
- Higher-class voltage rated gloves with leather protectors provide increased arc flash protection due to the increase in material thickness.
- When working with voltage, the primary consideration will be worker protection from this energy source. Electrical workers are not required to meet mechanical hazard protective glove specifications unless the contractor's hazard assessment has deemed it necessary.
- Electrical workers completing certain tasks related to new construction where voltage is not present (as determined by the contractor hazard assessment) will be required to wear gloves that meet the mechanical hazard protective glove specifications.

41.2 Project orientation shall include:

- Hand injury prevention live demonstration(s) showing hand injury prevention methods and techniques;
- Hierarchy of controls related to hand injury prevention;
- PPE - types of gloves, limitations, selection based on hazard assessment, etc.;
- Minimum requirements.
- **41.2** All employees are responsible for wearing company provided gloves to comply with this policy. Failure to comply will result in disciplinary action up to and including termination.
- **41.3** All employees required to wear protective gloves must routinely inspect and properly care for their assigned gloves (if the gloves are not disposable). Damaged gloves are not to be used.
- **41.4** General purpose leather, synthetic leather or fabric gloves may be used for general purposes.
- **41.5** Rubber, Neoprene or Vinyl Gloves will be used by all employees who perform a job function that requires the use of gloves to protect against chemicals. The SDS should be checked for specific instructions on which type of glove you may need for protection.

42.0 Housekeeping

- To provide a clean, safe and sanitary place of employment which is free from recognized hazards that could cause injury, whether minor or serious, or even death, to employees, guests, clients, and the general public. This policy will be in accordance with OSHA 1926.25 Housekeeping regulations, and 1915.81 General Working Conditions

43.0 Self Inspection / Audit

This program focuses on the identification and correction of hazards in the workplace, on a job site, and the representation of all employees during site safety inspection and corrections. The Safety Manager, the Supervisor/Superintendent or their qualified designee will personally conduct random self-inspections in the workplace on a regular basis and annually using the self-inspection checklist form. Safety issues regarding a corrective actions or preventative action plan will be called to the safety departments immediate attention, and a log will be kept of the safety issue and the corresponding action.

44.0 Lockout /Tagout Safety

Purpose The purpose is to establish minimum requirements for LOTO during energy control procedures whenever maintenance or repair is performed on equipment or machinery. Adherence to these guidelines will help ensure that machinery or equipment is rendered inert, isolated from all potentially hazardous energy sources, and locked out before employees perform any servicing or maintenance. Lockout devices and tagout devices shall indicate the identity of the employee applying the device(s). A periodic inspection of the energy control procedure shall be conducted at least annually to ensure the procedure is being followed. The periodic inspection shall be performed by an authorized employee other than the ones(s) utilizing the energy control procedure being inspected. The periodic inspection shall be conducted to correct any deviations or inadequacies identified. Where lockout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected.

Where tagout is used for energy control, the periodic inspection shall include a review, between the inspector and each authorized and affected employee, of that employee's responsibilities under the energy control procedure. The employer shall certify that the periodic inspections have been performed. The certification shall identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection, and the person performing the inspection. The machine or equipment shall be turned off or shutdown using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage. All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

Following the application of lockout/tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained or otherwise rendered safe. If there is a possibility of reaccumulation of stored energy, verification of isolation shall be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists. Prior to starting work on machines or equipment that have been locked or tagged out, the authorized employee shall verify that isolation & deenergization of the machine or equipment have been accomplished. Each employee must affix his/her personal LOTO device to the group lockout/tagout device before engaging in the servicing and maintenance operation. The supervisor in charge of the group lockout/tagout must not remove the group LOTO device until each employee in the

group has removed his/ her personal device. When more than one crew, craft, department, etc. is involved, overall job-associated lockout or tagout control must be assigned.

Andy Hostetter will provide training to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. Double H Drilling LLC will certify that employee training has been accomplished and is being kept up to date. The certification shall contain each employee's name and dates of training. Retraining shall be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard, or when there is a change in the energy control procedures. Additional retraining shall also be conducted whenever a periodic inspection reveals, or whenever the employer has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

44.1 Authorized Employees

Authorized employees subject to the requirements of this program, and those who require training

Include

- All persons who lock out or tag out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An employee becomes an authorized employee when that employee’s duties include servicing or maintenance covered under this section.

44.2 Affected Employees

Affected employees subject to the requirements of this program, and those who require training include:

- Employees whose job requires operation of equipment on which servicing, or maintenance is being performed under LOTO, or whose job requires work in an area which such servicing or maintenance is being performed. Machinery or equipment fulfilling all of the following elements need not have written energy control. program: The machine or equipment has not potential for stored or residual energy or re-accumulation of stored energy after shut down that could endanger employees.

- The machine or equipment has a single energy source energy that can be readily identified or isolated. • The isolation and locking out of that energy source will completely de-energize and deactivate the machine or equipment.
- The machine or equipment is isolated from that energy source and locked out during servicing or maintenance.
- A single lock out device will achieve a locked-out condition.
- The lock out device is under the exclusive control of the authorized employee performing the servicing or maintenance.
- The servicing or maintenance does not create hazards for other employees.
- The employer in utilizing this exception has had no accidents involving the unexpected activation or re-energization of the machine or equipment during servicing or maintenance.

Lockout is the preferred method of isolating machines or equipment form energy sources. Tag out is to be performed instead of lock out only when there is no way to lockout a machine.

Authorized employees that will be performing a lockout on a piece of equipment are required to notify affected employees prior to the job.

44.3 Lockout Devices

Double H Drilling LLC uses the metal/plastic hasp-type or flexible plastic lockout devices. These devices have the capacity to hold 6-8 locks and tags. Standard Master Brand key locks are used for securing the lockout device.

44.4 Tags

Double H Drilling LLC uses a variety of tags to identify de-energized equipment. Warning tags with various wording such as “Do not start!” “Do not operate!” and “Do not energize!” are available depending upon the type of equipment. Tags are made of a material that will withstand environmental conditions to which they are exposed.

44.5 Specific Equipment

Double H Drilling LLC performs service work on electrical equipment such as rectifiers and interconnects, and, therefore has tailored training to LOTO of that type of equipment. Double H Drilling LLC will normally defer to a client/operator to perform LOTO on affected equipment. However, in remote areas where client representatives are not available, Double H Drilling LLC will perform LOTO on affected equipment.

44.6 Energy Control Program

1. Preparation for Shutdown

Before an authorized or affected employee de-energizes a machine or piece of equipment, the authorized employee shall have the knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means to control the energy.

2. Machine or Equipment Shutdown

Equipment shall be de-energized using the procedures established for the machine or piece of equipment, the authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means to control the energy.

3. Machine or Equipment Isolation

All energy isolating devices required to control energy to the equipment shall be physically located and operated in such a manner so as to isolate the equipment form the energy source(s). (Energy Source: Any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, gravity or other energy sources.)

4. LOTO

Whenever possible, lock out shall be used. Tags should only be used where a lock out device cannot be installed.

- Authorized employees shall affix LOTO devices to each energyisolating device.
- Lock out devices, where used, shall be affixed in a manner that will secure the energy isolating devices in a “safe” or “off” position.
- Tag Out devices, where used, shall be affixed in such a manner so as to clearly indicate that the operation or movement of energy isolating devices from the “safe” or ‘off” position is prohibited.

Where a tag cannot be affixed directly to the energy isolating device, the tag shall be located as close as safely possible to the device in a position that will be immediately obvious to anyone attempting to operate the device. A tag out device should indicate the identity of the individual applying the tag, the reason for the tag out, and the date of the tag out.

Important! Tags are warning devices only and should not be considered a physical barrier to equipment isolation. Tags should never be bypassed, ignored, otherwise defeated, or removed by anyone without authorization of the authorized worker who installed it.

5. Stored Energy

Following installation of LOTO devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained, and otherwise rendered inert.

If there is a possibility of re-accumulation or stored energy to a hazardous level, verification of isolation shall be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists.

6. Verification of Isolation

Prior to starting work on machines or equipment that have been locked out or tagged out, the authorized employee shall verify that isolation and de-energization of the equipment has been achieved, even though isolation is performed prior to shut down and is checked at that point.

7. Release From Lock out or Tag out

Before LOTO devices are removed and energy is restored to the machine or equipment, procedures shall be followed and actions taken by the authorized employee(s) to ensure the following:

- The machine or equipment. The work area shall be inspected to ensure that nonessential items have been removed and to ensure that the machine or equipment components are operationally intact.
- Employees. The work area shall be inspected to ensure that all employees have been safely positioned or removed. After LOTO devices have been removed and before a machine or equipment is energized, affected employees shall be notified that the LOTO device(s) have been removed.

8. Lock out or Tag out Device Removal

The employee who applied the device shall remove each LOTO device from each energy-isolating device. Exception: When the authorized employee who applied the LOTO device is not available to remove it, that device may be removed under the direction of the employer, provided that specific procedures and training for sure removal have been developed, documented, and incorporated into the employer’s energy program. The employer shall demonstrate that the specific procedure provides equivalent safety for the removal of the device by the authorized employee who applied it.

When the situation arises that the employee who attached the lock out device is not present for the removal, the following procedure is to be followed

- Verify that the authorized employee who applied the device is not at the facility.

- Make a reasonable effort to contact the authorized employee to let him or her know that the device has been removed.
- Take steps to ensure that the authorized employee knows about the LOTO device removal before returning to work.

9. Testing or positioning of machines, equipment, or components

In situations where LOTO devices must be temporarily removed from the energy isolation device and the machine or equipment energized to test or position the machine, equipment or component thereof, the following sequence of actions shall be implemented:

- Clear the machine or equipment of tools and materials.
- Remove employees from the machine or equipment area.
- Remove the LOTO device(s).
- Energize and proceed with testing or positioning.
- De-energize all systems and reapply control measures to continue the servicing and/or maintenance.

An annual inspection of the energy control procedures will be performed by the Safety Department Administrator or Manager to ensure compliance with the applicable regulatory standards and guidelines.

44.7 Group LOTO

Double H Drilling LLC does not typically perform service work in groups or crews greater than two individuals. However, there may be instances where more than one worker is performing service work. In those rare occasions, Double H Drilling LLC has created a plan that affords the same level of protection to employees as the personal LOTO device.

When one or more workers or groups of workers is required to perform service or maintenance and multiple LOTO devices are to be installed, LOTO devices shall be used in accordance with the previously stated energy control program with the following stipulations:

- Each crew, craft, department, or other designated group of workers will be responsible for installing their own separate LOTO device
- Each crew, craft, department, or other designated group of workers will have an authorized worker to install and remove group LOTO devices.

- Each worker in a crew, craft, department, or other designated group shall attach a personal LOTO device to the group device while working then remove it when finished. This includes during shift changes.
- When the authorized worker changes shift, and after all individual personal LOTO devices are removed from the group LOTO, the authorized employer shall remove the crew, craft, department, or other designated group LOTO.
- No shift work shall begin until the new authorized worker has installed the crew, craft, department, or other designated group LOTO, and all individuals have installed personal LOTO devices in the group LOTO device.
- In no instance will an authorized worker be responsible for more than eight (8) workers in a group.

44.8 Tag Out - Defective Tools

In the event a tool is found to be defective or damaged, the following steps shall be followed:

- 1. Report deficiencies to authorized personnel.
- 2. Authorized personnel to inspect tool and determine steps needed to remove (de-energize, etc.) from use.
- 3. Tag the defective tool with a tag, the date and the authorized person’s initials.
- 4. Place in a designated area where it cannot be accessed by unauthorized personnel.
- 5. Only tools that have been repaired back to manufacturer’s standards can be put back in service, after verification by an authorized personnel. Otherwise it shall be discarded.

44.9 Training

Energy control program training is required for all authorized and affected employees upon initial hire, and when job assignments or equipment changes, or when there is a change in the energy control program. All training will be documented and certified by Double H Drilling LLC Retraining will occur at least annually.

Training will be completed utilizing of one or a combination of the following: • Classroom textbook,

- Video programs,
- Supervised on-the-job training,

- Other industry standard training program. Training will consist of the following:
- Review of General Procedures.
- Review of Specific Procedures of machinery, equipment and processes.
- Location and use of Specific Procedures.
- Procedures when questions arise.

44.10 Affected Employee and Other Employee Training

Only trained and authorized employees will repair, replace or adjust machinery, equipment or processes. Affected employees may not remove locks, locking devices or tags form machinery, equipment or circuits. Employees who are not authorized to utilize LOTO procedures will be trained on the purpose and use of the procedures.

44.11 Inspection

The Safety Administrator, Manager or his designee will conduct annual inspection of the energy control program with each authorized or affected worker, reviewing their responsibilities. An authorized employee will perform the inspection. Authorized employees may not inspect and certify their own performance of the energy control program.

Certification of the inspection shall include the date of inspection, equipment, description, employee(s), and name of the inspector.

Appendix

Appendix “A” Lock out / Tag out Inspection Record.

45.0 Subcontractor and Third-Party Personnel Management Plan

Past performance is a key indicator of future performance. Incident statistics should be obtained and analyzed to ensure that only safe subcontractors are hired. Obtain a copy of the subcontractor's OSHA Logs and Experience Modifier and compare their performance to others in their industry. Those who outperform the industry should be selected whenever practicable. Subcontractors must be provided a site orientation that addresses health, safety, security and/or environmental concerns. Subcontractors shall be included in pre-job meetings and JSAs/hazard assessments, pre-job meetings and/or tailgate meetings. Post-job performance reviews should be conducted for subcontractors. A combination of factors may be considered including, but not limited to, housekeeping, cost, safety and quality of work. Double H Drilling LLC will pre-qualify all subcontractors by reviewing their safety programs, training. documentation, Safety Statistics, and Drug and Alcohol Programs. Subcontractor’s plans must meet or exceed those ofDouble H Drilling LLC

All subcontractors will provide at our request a copy of training documentation pertaining to the work to be provided by subcontractor.

All sub-contractors will provide OSHA/MIOSHA, Workers Compensation, EMR Rating, Safety and Operator Qualification Plans, and any other information as requested.

45.1 Contracts

The contract will be executed by Double H Drilling LLC and Subcontractor prior to the start of work. Double H Drilling LLC must receive a current certificate of insurance prior to start of work as detailed in Exhibit C of the contract. Contractor shall not employ other subcontractor’s without advance permission of D Double H Drilling LLC and/or the client.

45.2 Safety Program

All subcontractors will provide to Double H Drilling LLC a copy of their safety plan for review and approval prior to contract approval.

Should the subcontractor not have a safety plan in place, they will adopt Double H Drilling LLC’s Safety Plans pertaining to the work to be completed, and complete the Safety Orientation and required Safety trainings and signoffs as required.

All subcontractors will provide at our request a copy of training documentation pertaining to the work to be provided by sub-contractor.

OSHA 300 & 300A forms, and Experience Modification Rating (EMR), will be used as one of the criteria for selecting qualified subcontractors.

Subcontractors must provide to Double H Drilling LLC Safety Data Sheets (SDS) for all hazardous materials brought. onto the job site. The Double H Drilling LLC designated vehicle will be considered the central location for all SDS's at each jobsite. If the sub-contractor is working without Double H Drilling LLC supervision the subcontractor's vehicle will become the central location for SDS information.

Subcontractors will be required to designate an onsite safety representative, and to provide a project specific safety plan to Double H Drilling LLC

The Safety Representative must have successfully completed the OSHA 10-Hr. Construction Training, and provide to Double H Drilling LLC documentation of such.

45.3 Drug & Alcohol Plan

Prior to the beginning of a project the sub-contractor must present evidence to Double H Drilling LLC of a Drug and Alcohol Plan which meets or exceeds the Double H Drilling LLC Plan. (It is specifically understood by the Subcontractor that the United State Department of Transportation (DOT) has enacted a "Rule" whose purpose is to control drug use in certain work occupations and places.)

45.4 Pre-Job Meetings / Safety Orientations

Subcontractor will be included and in pre-job safety meetings, Tailgate Safety and safety orientations, and inspections. If performing work without Double H Drilling LLC supervision, they will be required to complete and turn in to Double H Drilling LLC at the end of each week, a Tailgate Safety Meeting Form, completed at the beginning of each new job, or new location a minimum of once a week. Subcontractor will be required to designate an onsite safety representative, provide a job specific safety plan and attend pre-job meetings and safety orientations, as necessary.

45.5 On-Site and Post-job Safety Performance Reviews

Double H Drilling LLC will conduct on-site and post-job safety performance reviews on subcontractors to ensure that all safety procedures are, and were, being observed while subcontractor is/was on the job site. Double H Drilling LLC will review use of PPE, Safety Procedures and training records, completed Tailgate Safety Forms, and Accident/Incident reports.

Subcontractor will be included in Job Hazard Analysis when completing the Tailgate Safety Form.

45.6 Liability Insurance - Insurance

In addition to the current insurance that is required for Subcontractor’s indemnity obligations, Subcontractor agrees to obtain, maintain, and pay for policies providing the insurance described on attached Exhibit C - Insurance Requirements. All insurance required under this Subcontract shall be

Double H Drilling LLC issued by insurance companies that are acceptable to Double H Drilling LLC and the client. The insurance policies shall be kept current and cover Double H Drilling LLC, its surety (if any), and Owner as named as additional insured, and shall be primary insurance. Subcontractor shall provide to Double H Drilling LLC, at the time it signs this Subcontract, with a certificate from Subcontractor’s insurance company(s) verifying that all of the insurance required by this Subcontract is in place, and that none of the policies will be canceled except after thirty (30) days written notice to Double H Drilling LLC, must absolutely be kept current as long as subcontractor performs work for Double H Drilling LLC.

45.7 Operator Qualification - Subcontracted Personnel

All subcontractors will provide to Double H Drilling LLC a copy of their Operator Qualification Plan for our review and approval prior to contract approval.

Should the subcontractor not have an Operator Qualification Plan in place, they will adopt Double H Drilling LLC’s Operator Qualification Plan pertaining to the work to be completed, and complete the Operator Qualification Orientation and required Operator Qualification trainings, signoffs, and certifications as required.

All subcontractors will provide at our request a copy of training and qualification documentation pertaining to the scope of work for which the subcontractor is being considered.

Subcontracted personnel must be qualified prior to performing any covered tasks unless a qualified person is directing and observing the non-qualified individuals. The qualified person may be a subcontractor’s employee, an operator’s representative (Third Party) or a Double H Drilling LLC representative.

Contractor personnel must be qualified to perform covered tasks through a program that is identified as acceptable to Double H Drilling LLC and the owner. The acceptable evaluation methods are identified in the Double H Drilling LLC OQ Plan.

If a contractor qualifies their personnel under a program that is not listed in this plan, the program must be approved by Double H Drilling LLC and available for Double H Drilling LLC to perform periodic audits before individuals will be allowed to perform covered tasks.

Subcontractors may not use work performance history as the sole evaluation method at any time. When Double H Drilling LLC affiliates are providing services to Double H Drilling LLC under a service agreement, they must meet the requirements of this plan.

To ensure subcontracted personnel are able to recognize and react to Double H Drilling LLC’s, Double H Drilling LLC will conduct a Contractor Orientation that includes material on Double H Drilling LLC’s. The Sub Contractor may, submit to Double H Drilling LLC for approval, proof that they have completed and passed the Double H Drilling LLC knowledgebased training. Those trained on PPE, what to wear and when, proper wearing of the PPE and maintenance. Each employee will be given a certification that must be kept on person at all times. We will re-train annually or if we deem someone needing to be reminded of our policies. PPE is to be kept clean and will be given out as needed. Double H Drilling LLC will provide cases of drinking water for employees. On days where the temperature is above 80 we will have pop-ups for shade as need by employees. In high temperatures or in case of emergency due to heat we will take the same precautions as with an injury. Contact David Burrow, then maintain communication with victim of heat exposure.

Keep victim alert and talking until help arrives. Remind all employees to drink plenty of water throughout the day during the JSA, and to rest when necessary. We work in areas where the environment facilitates over heating. Management is required to make these elements known to all employees. During these times we encourage employees to drink 24 ounces of water an hour. Beware of getting in and out of the a/c or vehicles. Give yourself time to acclimate to the climate. If you are experiencing cold chills, clammy hands, or suddenly stop sweating, immediately report this to your direct supervisor. All heat exposure medical emergencies will follow Double H Drilling LLC evacuation procedures. All management at Double H Drilling LLC will be educated and trained on the severity of heat exposure and illness and how to spot and mitigate it in the field. Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.

Our industry requires us to work long hours and causes stress to wear on us. Due to this we will address fatigue during orientation and once a year. We have established a sixteen hour ceiling on any employees workday. A Double H Drilling LLC employees must be able to be provided at least eight hours of rest after every shift. Ergonomic equipment will be used to improve workstation conditions such as anti-fatigue mats for standing, lift assist devices for repetitive lifting, proper lighting and control of temperature, and other ergonomic devices as deemed appropriate. Work tasks to control fatigue must be analyzed and evaluated periodically. All crews will be provided a fifteen minute break at 10:00 a.m., thirty minutes at noon and fifteen minutes at 3:00 p.m. This is not exclusive and breaks can and should be taken as needed throughout the day. If at any time supervision notices an employee that looks fatigued

or overly tired they should make an executive decision on whether or not safety needs to be involved. Mental alertness is crucial to the safety and well being of all employees. Double H Drilling LLC upholds an absolutely no energy drink or over the counter drugs that assist in mental alertness. Any further questions refer to drug and alcohol policy.

The Illness Prevention Program headed by David Burrow requires every employee to comply with safe and healthy work practices. We have implemented a “GOOD CATCH” program as incentive to catch possible injuries or illness. These will be discussed at the “all-Hands” meetings on Monday mornings and during daily tasks and JSA’s. The “GOOD CATCH” program also gives employees the shield of reporting safety hazards without being judged or reprimanded. We use this program to assist us in addressing and evaluating possible hazards in the workplace. This is not limited to physical hazards, it will include chemicals and illness as well. Safety inspections should be periodic and documented. Can occur on a scheduled basis or when new or missed hazards are identified. Documentation should include the name of the inspector, date of inspection and findings.

Protective shields, protective barriers or insulating materials as necessary shall be provided. Conductive articles of jewelry and clothing (such as watch bands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread, or metal headgear) may not be worn if they might contact exposed energized parts. However, such articles may be worn if they are rendered nonconductive by covering, wrapping, or other insulating means.

Fall Protection Plan added 12/25

Training must be provided for each employee who might be exposed to fall hazards. Training must enable each employee to recognize the hazards of falling and the procedures to follow to minimize these hazards. Records showing participants, training dates and signatures of instructors must be maintained. Re-training should be provided when there are deficiencies in training, when work practices are changed or when fall protection equipment is modified. Training will be done at the Aransas Pass Facility by Andy Hostetter. Fall protection is required whenever employees are potentially exposed to falls from heights that exceed applicable regulatory thresholds. Guard rails, safety nets, or personal or fall arrest systems should be used. Some applicable regulatory thresholds may include:

- General Industry 1910.28(b)(1)(i) - Protection for wall openings and holes. Every wall opening from which there is a drop of more than 4 feet shall be guarded.

- Construction Industry 1926.501(b)(1) - Unprotected sides and edges. Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from

falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

- Marine Terminals 1917.112(b)(1) - Guardrails shall be provided at locations where employees are exposed to floor or wall openings or waterside edges, including bridges or gangway-like structures leading to pilings or vessel mooring or berthing installations, which present a hazard of falling more than 4 feet (1.22 m) or into the water.

- Shipyard Industry 1915.73(d) - When employees are exposed to unguarded edges of decks, platforms, flats, and similar flat surfaces, more than 5 feet above a solid surface, the edges shall be guarded by adequate guardrails.

- Steel Erection 1926.760(a)(1) - Each employee engaged in a steel erection activity who is on a walking/working surface with an unprotected side or edge more than 15 feet (4.6 m) above a lower level shall be protected from fall hazards by guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems. Incidents must be investigated. The investigation will look at the fall protection plan to see if any updates are needed to keep the incident from happening again. Equipment and services for prompt rescue of fallen workers must be available before elevated work begins. Local fire departments may not have the means to perform safe and efficient rescue, so do not assume they are able to do so.

45.8 Ground Fault Protection Qualification - All Personnel

An assured grounding conductor program has been implemented on sites covering all cord sets, receptacles which are not part of the building or structure & equipment connected by cord & plug which are available for use or used by employees. This program is directed by Andy Hostetter. (as defined in 1926.32(f)) Each cord set, attachment cap, plug and receptacle of cord sets, and any equipment connected by cord and plug, except cord sets and receptacles which are fixed and not exposed to damage, shall be visually inspected before each day's use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal damage. Equipment found damaged or defective shall not be used until repaired. All equipment grounding conductors shall be tested for continuity & shall be electrically continuous.

Each receptacle & attachment cap or plug shall be tested for correct attachment of the equipment grounding conductors.

The equipment grounding conductor shall be connected to its proper terminal:

(1) Before each use.

(2) Before equipment is returned to service following any repairs

(3) Before equipment is used such as when a cord has been run over.

(4) At intervals not to exceed 3 months,

(5) Cord sets & receptacles which are fixed & not exposed to damage shall be tested at intervals not exceeding 6 months.

Tests performed as required by this program shall be recorded as to the identity of each receptacle, cord set, & cord & plug connected equipment that passed the test and shall indicate the last date tested or interval for which is was tested. This record shall be kept by means of logs, color coding, or other effective means & shall be maintained until replaced by a more current record. These records shall be made available at the job site for inspection by the Assistant Secretary & any affected employees. Any equipment which has not met the requirements of this program shall not be available or permitted to be used. Damaged items shall not be used until repaired.

45.9 Power Tools - Storage and Safety

All tools furnished by Double H Drilling LLC should be stored and checked regularly for any damages and/or electrical faults. We require any tools not safe to operate be brought to the attention of Andy. Such tools shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation. Tools that are equipped with guards must maintain those guards at all times. Guards shall be in place and operable at all times while the tool is in use. The guard may not be manipulated in such way that will compromise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in ANSI B15.1. Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases shall be provided with particular PPE necessary to protect them from the hazard.

45.10 Scaffold - Storage and Safety

Employees who perform work while on a scaffold must be trained by Andy Hostetter. The training shall include: a) The nature of any electrical hazards, fall hazards and falling object hazards in the work area; b) The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used; c) The proper use of the scaffold, and the proper handling of materials on the scaffold; d) The maximum intended load and the load-carrying capacities of the scaffolds used; and e) Any other pertinent requirements of the Regulation. When there is reason to believe an employee lacks the skill or understanding of the safe erection, use or dismantling of scaffolds, the employee shall be retrained. Retraining is required in at least the following situations: a) Where changes at the worksite present a hazard about which an employee has not been previously trained; or b) Where changes in the types of scaffolds, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been previously trained; or c) Where inadequacies in an affected employee's work involving scaffolds indicate that the employee has not retained the requisite proficiency.

Scaffolds and scaffold components shall be inspected for visible defects by a competent person before each work shift, and after any occurrence which could affect a scaffold's structural integrity. Any part of a scaffold damaged or weakened shall be immediately repaired or replaced, braced or removed from service until repaired. Contact Andy Hostetter for all inspection details. Unsafe equipment or conditions must be tagged out by a competent person and must be complied with.

46.0 Pandemic Preparedness -Safety & Response

Pandemic preparedness means to be ready for any pandemic. Most recently we encountered Covid-19 and maintain a close eye on monkey pox. This plan is implemented for any pandemic. Our pandemic disease plan or disease containment plan has been developed for the company and Andy Hostetter appointed for the implementation of the plan. This will include contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals. We will follow CDC Guidelines. Hand washing and use of hand sanitizers is encouraged by Double H Drilling LLC and our supervision. Hand washing facilities, hand sanitizers, tissues, no touch trash cans, hand soap and disposable towels should be provided and available at each jobsite. Employees of Double H Drilling LLC Will be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease, and when it is appropriate to return to work after illness.

Disease containment plans and expectations will be shared with employees. Communicating information with non-English speaking employees or those with disabilities must be considered. Flexible work policies have been developed and workers are encouraged to stay at home when ill, when having to care for ill family members, or when caring for children when schools close, without fear of reprisal. Business continuity plans have been prepared so that if significant absenteeism or changes in business practices are required business operations can be effectively maintained. Tele-commuting or other work-at-home strategies have been developed. If at anytime we need to implement these strategies at a location contact David Burrow. All employees at Double H Drilling LLC Are encouraged to obtain appropriate immunizations to help avoid disease. Granting time off work to obtain a vaccine or stay at home when sick will be considered when and if vaccines become available in the community. At this time all vaccines that are available are recommended.

Key contacts, a chain of communications and contact numbers for employees, and processes for tracking business and employees status has been developed. These change from job to job and will be addressed in the pre-job stage of preparing. A procedure has been developed to notify key contacts including both customers and suppliers in the event an outbreak has impacted Double H Drilling LLC’s ability to perform services. This procedure also includes notification to customers and suppliers when operations resume. Social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings will be considered. Clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) periodically and when visibly

soiled. Work surfaces should also be cleaned frequently using normal cleaning products.

This plan and emergency communication strategies should be periodically tested to ensure it is effective and workable. Site management will be responsible for this. Following a pandemic event, the person responsible for implementation of the plan should identify learning opportunities and take action to implement any corrective actions.

47.0 Incident Investigation

Any and all incidents will be investigated. Employees are to follow company protocol. Double H Drilling LLC Will be notified of incident that is work-related we will immediately send qualified personnel to investigate. We determine the extent of each investigation on the seriousness of the incident. All incidents are reported immediately to supervisors and supervisors will report to company. Incidents will be reported to applicable regulatory agencies within eight hours of their discovery. Incidents will also be reported to our client as soon as the situation permits. In a timely matter no later than 24 hours of incident. Here at Double H we train and update our qualifications as often as we can. Members of the incident investigation team are also qualified as competent persons. Double H Drilling LLC Provides initial and updated training to all personnel based on their individual roles in the company. This stands true for incidents and the response team as well. Prior to being placed on the incident team.

All members will be provided adequate training. The Safety team and incident team will handle each incident as protocol labels it. List of people, equipment, and materials involved. Recording of weather, lighting, the surrounding environment, such as noise, area, and things that may complicate the job. The evidence collected in every investigation must be preserved, secured and collected: notes, photographs, statements, and other means of solutions. Every Incident will be concluded with a written incident investigation report. This report will describe the situation the immediate and long term corrective actions taken as well as any ideas about how to prevent the recurrence of the incident. These documents will also include written reports, descriptions of the incident, any and all evidence, and a detailed explanation and preventive measures be taken. Any and all evidence collected during an investigation will be collected and preserved. All written incident investigation report shall include any immediate corrective actions that were taken as well as any long-term actions that are required to prevent the recurrence of the incident.

Incident Investigations must be documented. Participants shall prepare a written report including the description of the incident, any evidence collected during the

investigation, an explanation of the causes of the incident and corrective actions. Lessons learned should be reviewed and communicated. Changes to processes must be placed into effect to prevent reoccurrence or similar events.The team has put together a close call lessons learned program where we share weekly across all projects the close calls and lessons learned during that week. This is a great time for us to openly share changes to processes and safety measures that need to be implemented to prevent any similar occurrence or incidents. Any questions regarding the incident investigation team please contact Andy at doublehdrilling@gmail.com.

47.1 OSHA Reporting

In the event of an incident management will contact OSHA within 8 hours to notify them of any incident.

48.0 Work Area Illumination and Pre-Entry Inspection

48.1 Purpose and Application

Double H Drilling LLC will provide adequate lighting before employees enter a work area and maintain it throughout the work. This section applies to nighttime, early-morning, indoor, shaded, enclosed and other low-light work, including access routes, excavations, equipment operating areas and emergency exits.

OSHA basis: 29 CFR 1926.26 and 1926.56 establish construction lighting requirements. The inspection, measurement, approval and stop-work steps below are Double H company procedures for implementing those requirements.

48.2 Minimum Lighting Levels

The table summarizes OSHA Table D-3. Double H requires at least 5 foot-candles for general field work, excavations and access routes, including the locations for which OSHA lists 3 foot-candles. Apply any higher OSHA, client or applicable state requirement, and provide additional task lighting whenever hazards or the work cannot be seen clearly.

Area / operation	OSHA minimum (foot-candles)
General construction lighting	5
Construction areas; concrete placement; excavations; waste, access, active storage, loading, refueling and field maintenance areas	3
Indoor warehouses, corridors, hallways and exit routes	5
Tunnels, shafts and other underground work	5
Tunnel / shaft headings during drilling, mucking or scaling	10
Construction plants and shops; equipment rooms, rigging lofts, active storerooms, mess halls, indoor toilets and workrooms	10
First-aid facilities and offices	30

For operations outside these categories, use the lighting guidance referenced in 1926.56(b). A numeric minimum alone does not resolve glare, deep shadows or poor visibility of the task.

48.3 Inspection Before Entry

- The foreman or designated supervisor shall evaluate lighting from a safe location before allowing routine access or work. Arrange lighting and verification from a safe position; do not send an employee into an unlit area simply to inspect it.
- Check the entire access and exit route and the work location. Employees must be able to identify walking surfaces, steps, ladders, changes in elevation, excavation edges, openings, hoses, cords, materials, moving equipment and other hazards.
- Confirm that lights are operating and properly positioned. Check for shadows behind equipment and materials, glare directed toward employees or equipment operators, and obstructions that block the light.
- Verify illumination with a suitable light meter maintained and checked according to the manufacturer's instructions. Measure at relevant walking and working surfaces, including the least-lit locations, with the actual lighting arrangement in use. Do not rely solely on lamp wattage, lumen ratings, a phone flashlight or a visual estimate.
- Confirm that evacuation routes remain visible and that suitable backup lighting is available where loss of primary lighting could prevent safe shutdown or exit. Discuss the lighting plan and loss-of-light response during the JSA or pre-task briefing.
- The supervisor shall correct deficiencies and verify the required lighting before releasing the area for entry. Illumination does not replace excavation inspections, confined-space permits, atmospheric testing, fall protection or other required entry controls.

48.4 Lighting Equipment and Placement

- Use lighting suitable for the environment and any applicable hazardous-location classification. Secure light stands and towers and position them to illuminate the work without directing glare at operators, traffic or employees.
- Follow 1926.405(a)(2): protect lamps against contact or breakage, ground metal-case sockets and protect cords from damage. Suspend temporary lights by their cords only when designed for that purpose. Use hard- or extra-hard-service flexible cords for temporary and portable lights.
- In wet or other conductive locations, portable electric lights shall operate at 12 volts or less, or 120 volts with GFCI protection, as specified by 1926.405(a)(2)(ii)(G). Have

qualified personnel address electrical defects; employees shall not improvise electrical repairs.

- Route cords and place generators and light towers so they do not obstruct access, create trip hazards or expose employees to exhaust. Apply the handbook's electrical protection and equipment inspection requirements.
- Headlamps and vehicle lights may supplement area lighting. They shall not serve as the only lighting unless the supervisor verifies that all applicable levels and visibility requirements are maintained, including when a person or vehicle moves.

48.5 Electrical Hazard Precautions Before Entry and Work

Double H applies the precautions below as company safe-work practices, consistent with 1926.416 and 1926.1053(b)(12), and the corresponding provisions of 1910.333(c)(4), (5), (7) and (8). Follow the handbook’s electrical work and lockout/tagout procedures.

- Do not enter spaces containing exposed energized parts unless lighting permits safe work. Do not work near such parts when darkness or an obstruction prevents a clear view, and never reach blindly into an area that may contain energized parts.
- Protective shields, protective barriers or insulating materials shall be provided and used as necessary to prevent inadvertent contact with exposed energized parts, including in confined or enclosed spaces. Secure doors and hinged panels so they cannot swing into an employee and cause contact.
- Portable ladders shall have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized parts.
- Conductive articles of jewelry and clothing, such as watch bands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread or metal headgear, may not be worn if they might contact exposed energized parts. However, such articles may be worn if they are rendered nonconductive by covering, wrapping or other insulating means.
- Before entry or work, the supervisor shall verify that the required barriers and insulating materials are in place, the ladder is suitable for the electrical exposure, and conductive jewelry or clothing has been removed or effectively insulated. Record deficiencies and corrections in the JSA or inspection record.

48.6 Inadequate Lighting and Loss of Power

- Do not enter, or continue work in, an area with inadequate illumination. Stop affected work and notify the foreman immediately when a light fails, conditions change or hazards cannot be seen clearly.
- If lighting is lost after entry, stop movement and operations as safely as conditions allow. Use available backup lighting and follow the planned safe shutdown and exit procedure. Do not continue work or walk blindly through the area.
- Restrict access until lighting is restored or supplemental lighting is installed. The supervisor shall recheck visibility and light levels and authorize re-entry and restart only after deficiencies are corrected.

48.7 Rechecks and Documentation

- Recheck lighting before each shift and after relocation of lights, changes in the work area, loss of daylight, weather changes or a power interruption. Include the access route as well as the task location.
- Record the work location, lighting arrangement, required level, lowest measured level, deficiencies, corrective actions and supervisor verification in the JSA or inspection record. Employees shall report lighting concerns promptly.

48.8 OSHA References

29 CFR 1926.26 - Illumination:
https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.26

29 CFR 1926.56(a), Table D-3, and 1926.56(b) - Illumination:
https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.56

29 CFR 1926.405(a)(2) - Temporary wiring and lighting:
https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.405

29 CFR 1926.416(a) - Protection against electrical contact:
https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.416

29 CFR 1926.1053(b)(12) - Nonconductive ladder side rails:
https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.1053

29 CFR 1910.333(c)(4), (5), (7) and (8) - Electrical safe-work practices adopted in this company procedure:
https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.333

49.0 Assured Equipment Grounding Conductor Program

Double H Drilling LLC shall establish and implement an assured equipment grounding conductor program at all construction sites. The program shall cover all cord sets, receptacles that are not part of the permanent wiring of the building or structure, and cord-and-plug-connected equipment available for use or used by employees.

A written description of this program, including its specific procedures, shall be available at each jobsite for inspection and copying by the Assistant Secretary of Labor for Occupational Safety and Health and affected employees.

49.1 Designated Competent Persons

Double H Drilling LLC shall designate one or more competent persons, as defined in 29 CFR 1926.32(f), to implement the program. These persons must be capable of identifying existing and predictable hazards and authorized to take prompt corrective measures to eliminate them.

49.2 Daily Visual Inspections

Before each day's use, inspect each cord set, attachment cap, plug, cord-set receptacle, and cord-and-plug-connected equipment for external defects - including deformed or missing pins and damaged insulation - and indications of possible internal damage. Cord sets and receptacles that are fixed and not exposed to damage are exempt from this daily visual inspection requirement.

Damaged or defective equipment shall not be used until repaired and successfully retested.

49.3 Required Electrical Tests

All equipment grounding conductors shall be tested for continuity and shall be electrically continuous. Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductor. The grounding conductor shall be connected to its proper terminal.

These tests apply to covered cord sets, nonpermanent receptacles, and cord-and-plug-connected equipment required to be grounded.

49.4 Testing Schedule

Double H requires the following tests:

1. Before each use.

2. Before equipment is returned to service following repairs.

3. Before equipment is used following any incident reasonably suspected of causing damage, such as a cord set being run over.

4. At intervals not exceeding three months.

5. For cord sets and receptacles that are fixed and not exposed to damage, at intervals not exceeding six months.

The before-each-use testing requirement is a Double H company requirement; OSHA specifies testing before first use.

49.5 Test Records

Record the identity of each receptacle, cord set, and cord-and-plug-connected equipment that passes testing, together with the last test date or the interval covered by the test.

Maintain these records through logs, color coding, or another effective method until replaced by a more current record. Records shall be available at the jobsite for inspection by the Assistant Secretary and affected employees.

49.6 Equipment Restrictions

Equipment that has not met this program's requirements shall not be made available or permitted for employee use. Remove damaged, defective, or failed equipment from service, identify it to prevent use, and return it to service only after repairs and successful testing.

49.7 References

29 CFR 1926.404(b)(1)(iii) and 1926.32(f).

50.0 Case Management and Return-to-Work Policy and Procedure

Purpose

Double H Drilling LLC is committed to providing appropriate case management for employees who experience a work-related injury or illness and to returning employees to productive work as soon as medically appropriate. The purpose of this program is to establish a consistent process for reporting, evaluating, classifying, managing, and monitoring occupational injuries and illnesses while identifying appropriate return-to-work opportunities based upon the employee's medical restrictions and ability to safely perform assigned duties.

50.1 Policy

All work-related injuries and illnesses, regardless of severity, shall be reported immediately to the employee's supervisor and Double H Drilling LLC management. Double H Drilling LLC will evaluate each case individually and coordinate appropriate medical treatment, case management, work restrictions, and return-to-work opportunities. An employee will not be assigned work that exceeds restrictions established by an authorized medical provider.

50.2 Injury and Illness Classification

Following notification of an injury or illness, Double H Drilling LLC shall gather sufficient information to determine the nature and severity of the condition and the appropriate response. Injuries and illnesses may be classified, as applicable, as First Aid, Medical Treatment, Restricted Work or Job Transfer, Days Away From Work, Occupational Illness, or Emergency/Serious Injury. OSHA recordability determinations shall be made in accordance with applicable OSHA recordkeeping requirements. The classification of an injury shall not be altered solely for the purpose of avoiding an OSHA-recordable case.

50.3 Initial Response and Medical Evaluation

1. The employee shall immediately notify their supervisor.
2. Necessary first aid or emergency medical assistance shall be provided.
3. The supervisor shall notify Double H Drilling LLC management and Safety personnel.
4. When professional medical evaluation is necessary, the employee shall be directed to an appropriate medical provider.
5. Information concerning the employee's essential job duties should be made available to the medical provider when appropriate so that informed work restrictions can be established.
6. All applicable incident reports and investigation documentation shall be completed.

Emergency medical treatment shall never be delayed for administrative or case-management purposes.

50.4 Case Management

Double H Drilling LLC management or its designated representative shall monitor occupational injury and illness cases requiring continuing medical treatment, restrictions, or time away from work. Case management may include coordinating communication with the employee; obtaining appropriate work-status documentation; reviewing medical restrictions; coordinating follow-up appointments when appropriate; communicating available job duties to the medical provider; identifying temporary modified-duty assignments; monitoring changes in restrictions or capabilities; maintaining required workers' compensation and safety documentation; and coordinating the employee's progression toward regular duties. Medical information shall be handled confidentially and disclosed only as permitted or required by applicable law.

50.5 Return-to-Work Program

Double H Drilling LLC will make reasonable efforts to return an injured or ill employee to productive work as soon as the employee is medically able to safely perform available work. When an employee cannot immediately return to their regular position, temporary modified or restricted duty may be considered. Modified-duty assignments shall be based upon restrictions established by the employee's medical provider, the employee's physical capabilities, essential functions of available work, workplace hazards, training and qualifications, expected duration of restrictions, and availability of meaningful productive work. Modified duty shall never require an employee to perform tasks that conflict with documented medical restrictions.

50.6 Examples of Modified Duty

Depending upon restrictions, qualifications, and available work, temporary modified duties may include administrative or clerical work; safety documentation and recordkeeping; inventory or material tracking; equipment or vehicle inspection documentation that does not require restricted physical activity; training assistance; jobsite documentation; quality-control paperwork; or other productive tasks that can be safely performed within established restrictions. Modified-duty assignments shall not be created or assigned solely to discourage reporting of injuries.

50.7 Written Modified-Duty Assignment

When practical, temporary modified-duty assignments should be documented and include the employee name, date restrictions begin, applicable medical restrictions, assigned duties, work schedule, supervisor, expected duration, and follow-up or reevaluation date. The employee and supervisor shall review the restrictions before the employee begins modified work.

50.8 Monitoring and Follow-Up

Employees participating in modified duty shall immediately notify their supervisor if their medical restrictions change, their condition worsens, assigned duties cause unexpected pain or difficulty, or they believe an assigned task exceeds their restrictions. Management shall periodically review the employee's status and modify the assignment when appropriate. Updated medical work-status documentation may be requested consistent with applicable law and company procedures.

50.9 Full-Duty Release

An employee may return to unrestricted regular duties when medically appropriate and when any required release or work-status documentation has been received. If permanent restrictions are established, Double H Drilling LLC will evaluate the situation individually and address available accommodations and employment obligations in accordance with applicable federal and state law.

50.10 Employee Responsibilities

Employees are expected to immediately report work-related injuries and illnesses; cooperate with appropriate medical evaluation and treatment; provide required work-status documentation; follow medical restrictions; attend scheduled follow-up appointments; communicate changes in work status promptly; and perform assigned modified duties safely and within established restrictions. Employees shall not perform work outside their documented restrictions unless those restrictions have been formally modified or removed by the appropriate medical provider.

50.11 Supervisor Responsibilities

Supervisors shall ensure injuries and illnesses are reported promptly; arrange appropriate initial medical response; notify management and Safety personnel; understand and comply with the employee's restrictions; identify potential modified-duty assignments; ensure assigned work remains within restrictions; monitor the employee while performing modified duties; and report concerns or changes immediately.

50.12 Non-Retaliation

Double H Drilling LLC prohibits retaliation against an employee for reporting a work-related injury or illness, seeking medical treatment, filing a workers' compensation claim, or exercising rights provided under applicable occupational safety and employment laws.

50.13 Program Administration

Double H Drilling LLC management and the Safety Department are responsible for administering this program and coordinating with employees, supervisors, medical providers, insurance representatives, and workers' compensation professionals as appropriate. The primary objective of this program is to provide appropriate care, accurately classify occupational injuries and illnesses, prevent further injury, and return employees to safe and productive work as soon as medically appropriate.

51.0 Industrial Hygiene and Occupational Health

Purpose. Double H Drilling LLC shall identify, evaluate, and control occupational health hazards that may arise from drilling, excavation, welding, cutting, coating, maintenance, pipeline, utility, and related construction activities. The company will use hazard assessment, Safety Data Sheets (SDS), employee training, exposure monitoring when warranted, engineering and work-practice controls, appropriate PPE and respiratory protection, medical surveillance when required, and documented corrective action.

General Requirements. Before work begins, supervisors shall evaluate the scope for potential airborne, chemical, physical, and radiological hazards. Employees shall be informed of applicable hazards and controls through orientation, JSA/JHA review, SDS information, task-specific training, and client requirements. Where an exposure may exceed an applicable occupational exposure limit, Double H Drilling LLC shall implement controls and monitoring consistent with applicable OSHA requirements. Employees shall not knowingly enter a regulated or restricted exposure area without required training, authorization, monitoring, and PPE.

51.1 Asbestos

Double H Drilling LLC does not authorize employees to disturb presumed or confirmed asbestos-containing material unless the work has been specifically evaluated and assigned to properly trained and qualified personnel. Suspect insulation, transite/cement pipe or board, mastics, gaskets, coatings, or other legacy building or facility materials shall not be cut, drilled, ground, removed, or otherwise disturbed until their status is determined. If suspect material is encountered, work shall stop, the area shall be controlled, and the supervisor/client shall be notified. Required assessment, regulated-area controls, respiratory protection, protective clothing, hygiene practices, exposure monitoring, and medical surveillance shall be provided when applicable.

51.2 Benzene

Potential benzene exposure may occur around gasoline, condensate, crude oil, petroleum products, contaminated soil, tanks, piping, or process equipment. Existing handbook requirements already recognize that benzene monitoring may be required where standing or residual gasoline is present. When benzene exposure is reasonably anticipated, Double H Drilling LLC shall evaluate the task, review SDS and process information, establish controls, conduct air monitoring when warranted, restrict access as necessary, and provide appropriate PPE and respiratory protection. Employees shall avoid skin contact and inhalation of vapors and shall promptly report symptoms or suspected overexposure.

51.3 Hexavalent Chromium (Cr(VI))

Hexavalent chromium exposure may be generated when welding, cutting, brazing, grinding, or heating stainless steel, chromium-containing alloys, or chromium-containing coatings. Before hot work or abrasive work on unknown or coated metal, the material/coating shall be evaluated when feasible. Controls may include substitution, local exhaust ventilation, positioning, respiratory protection, restricted access, housekeeping methods that minimize airborne dust, and exposure monitoring. Compressed air or dry sweeping shall not be used to disperse chromium-containing dust where it could increase employee exposure.

51.4 Hydrogen Sulfide (H2S)

Hydrogen sulfide may be present in oil and gas facilities, pipelines, tanks, pits, excavations, sewers, produced-water systems, and other oxygen-deficient or contaminated atmospheres. The existing Double H Drilling LLC H2S Safety Program remains applicable. Where H2S is known or reasonably anticipated, atmospheric testing shall be performed with properly calibrated equipment as required by the hazard assessment or client rules. Employees shall follow alarm limits, evacuation requirements, wind-direction awareness, buddy/communication procedures, and respiratory-protection requirements established for the site. Employees shall never rely on odor to determine whether H2S is present.

51.5 Lead

Lead exposure may occur when disturbing lead-containing paint, coatings, pipe components, solder, contaminated soil, or other materials. Before torch cutting, welding, grinding, abrasive blasting, sanding, scraping, or demolition of suspect coatings/materials, the potential for lead shall be evaluated. When exposure is possible, Double H Drilling LLC shall use feasible engineering and work-practice controls, appropriate PPE and respiratory protection, hygiene controls, exposure monitoring, and medical surveillance when required. Eating, drinking, smoking, or tobacco use shall not be permitted in areas where lead contamination could result in ingestion.

51.6 Radiation

Radiation hazards may include industrial radiography using gamma ray or X-ray equipment and other ionizing-radiation sources encountered on client facilities. Double H Drilling LLC employees shall not operate radiographic equipment unless specifically trained, qualified, and authorized. When third-party radiography is performed, barricades, postings, controlled-area boundaries, communication, and instructions from the qualified radiography provider shall be followed. Employees shall remain outside established radiation boundaries unless authorized. This section supplements the handbook's existing Radiographic Operations requirements.

51.7 Respirable Crystalline Silica

Respirable crystalline silica may be generated by cutting, drilling, grinding, crushing, chipping, jackhammering, sweeping, or otherwise disturbing concrete, masonry, stone, rock, sand, or silica-containing soil/materials. Double H Drilling LLC shall evaluate silica-generating tasks and use effective engineering controls such as wet methods, integrated water delivery, or local exhaust/dust collection where feasible. Required respiratory protection shall be used when engineering/work-practice controls are insufficient or when required by the applicable task/control method. Dry sweeping or compressed-air cleaning shall be avoided when it could contribute to silica exposure and a safer alternative is feasible.

51.8 Total Hydrocarbons / Petroleum Hydrocarbon Vapors

Potential hydrocarbon exposure may occur during pipeline tie-ins, purging, excavation around contaminated soil, tank or vessel work, fueling, spill response, maintenance, or work around petroleum products. Hazard assessment shall consider flammability, oxygen displacement, toxic constituents such as benzene, and vapor accumulation in low areas or confined spaces. Where conditions warrant, atmospheric monitoring may include oxygen, lower explosive limit (LEL), and appropriate direct-reading or sampling methods for hydrocarbons/VOCs and specific toxic constituents. Ignition sources shall be controlled, ventilation provided when appropriate, and employees shall follow hot-work, confined-space, respiratory-protection, and emergency procedures applicable to the task.

51.9 Welding Fumes

Welding, cutting, brazing, gouging, and related hot work can generate metal fumes, gases, and particulates. Before work, employees shall consider the base metal, coatings, consumables, ventilation, work location, and potential contaminants. Coatings that may create hazardous fumes shall be removed or otherwise controlled when required and safe to do so. General or local exhaust ventilation shall be used where feasible, and employees shall position themselves to avoid the fume plume. Respiratory protection shall be used when required by the hazard assessment, exposure monitoring, SDS, client requirements, or applicable regulation. Special attention shall be given to stainless steel, galvanized metal, painted/coated materials, and confined or poorly ventilated spaces.

51.10 Exposure Assessment and Monitoring

Exposure monitoring shall be performed when required by regulation, client specification, prior exposure data, employee complaint, visible emissions, process changes, or professional judgment. Monitoring may include personal breathing-zone sampling, area sampling, direct-reading instruments, noise dosimetry, or other recognized methods. Instruments shall be maintained and calibrated in accordance with manufacturer requirements. Results shall be documented and communicated to affected employees as required.

51.11 Hierarchy of Controls

Double H Drilling LLC shall control occupational health hazards using the hierarchy of controls: elimination or substitution when feasible; engineering controls such as ventilation, isolation, wet methods, and dust collection; administrative/work-practice controls such as restricted access, task rotation when appropriate, hygiene, and safe procedures; and PPE/respiratory protection as required. PPE shall not be used as the sole control when a feasible and required engineering or work-practice control is available.

51.12 Respiratory Protection

When respiratory protection is required, employees shall use only company-approved respirators under the applicable respiratory protection program. Required elements include medical evaluation, fit testing for tight-fitting respirators, training, proper cartridge/filter selection, inspection, cleaning, storage, and change-out or replacement requirements. Facial hair or other conditions that interfere with the respirator seal are not permitted when a tight-fitting respirator is required.

51.13 Medical Surveillance and Occupational Health

Medical surveillance or occupational health evaluations shall be provided when required by an applicable substance-specific standard, exposure level, respirator use, client requirement, or other regulatory requirement. Medical information shall be handled confidentially. Work restrictions and return-to-work decisions shall be managed in accordance with Section 50.0, Case Management and Return-to-Work Policy and Procedure.

51.14 Employee Training and Responsibilities

Employees exposed or potentially exposed to occupational health hazards shall receive training appropriate to the hazard and assigned work. Training shall address hazard recognition, routes of exposure, symptoms of overexposure, required controls, PPE, respirator requirements when applicable, emergency actions, hygiene, and reporting procedures. Employees are responsible for following established controls, using assigned PPE, reporting damaged controls or monitoring equipment, and immediately reporting suspected exposure, symptoms, spills, releases, or changing conditions.

51.15 Records and Program Review

Double H Drilling LLC shall maintain applicable exposure-monitoring, training, medical-surveillance, respiratory-protection, and related occupational health records for the periods required by law and company policy. The Safety Department shall periodically review this program and revise it when work processes, hazards, regulations, client requirements, or exposure information change.

51.16 References

Applicable requirements include OSHA construction and general-industry standards addressing asbestos, benzene, hexavalent chromium, lead, respirable crystalline silica, respiratory protection, hazard communication, welding/cutting, and ionizing radiation, together with applicable state-plan, client, and site-specific requirements. Where a client or site rule is more protective, the more protective requirement shall be followed.

52.0 Short Service Employee - Green Hard Hat Identification

Purpose. This section supplements Section 30.0, Personal Conduct - Short Service Employees, by establishing a visible identification method for Short Service Employees (SSEs) so supervisors, mentors, coworkers, clients, and other site personnel can readily recognize employees who require additional oversight and mentoring.

52.1 Green Hard Hat Requirement

Employees classified as Short Service Employees under Section 30.0 shall wear a **green hard hat** while performing field work unless a client or site-specific requirement mandates a different identification method. When a different method is required, Double H Drilling LLC shall use the client-approved method while maintaining the intent of clearly identifying the employee as an SSE.

52.2 Duration

The green hard hat requirement shall remain in effect during the employee's Short Service period and until the employee has completed the applicable orientation, task training, mentoring, and competency requirements and has been released from SSE status by Double H Drilling LLC management or the designated supervisor. Completion of six months of employment alone does not authorize an employee to perform tasks for which the employee has not been trained, qualified, or otherwise authorized.

52.3 Supervision and Mentoring

• SSEs shall comply with the mentoring and qualified-to-nonqualified ratios established in Section 30.0 and applicable client requirements.

• The assigned mentor or supervisor shall provide direct guidance appropriate to the employee's experience, assigned work, hazards, and demonstrated ability.

• SSEs shall not independently perform work requiring a competent person, qualified person, certification, operator qualification, license, or other specific authorization unless those requirements have been satisfied.

• Supervisors shall intervene when an SSE is observed performing a task beyond the employee's training, qualification, or demonstrated ability.

52.4 Employee Responsibilities

Short Service Employees shall participate in required training, ask questions when unsure, follow the direction of assigned mentors and supervisors, use required PPE, participate in JSAs/JHAs and tailgate meetings, and immediately report unsafe conditions, incidents, near misses, or tasks they do not understand.

52.5 Removal from SSE Status

Removal from SSE status shall be based on completion of the required service period, satisfactory safety performance, completion of required training and qualifications, and supervisor verification that the employee can safely perform assigned duties. Records of SSE completion should be maintained with applicable training or personnel records.

53.0 Process Safety Management (PSM) Policy

Purpose. Double H Drilling LLC establishes this policy for work performed at facilities or processes subject to Process Safety Management requirements and for client sites that require contractor compliance with a PSM program. Double H Drilling LLC shall coordinate with the host employer and comply with applicable site-specific process safety requirements before and during work.

53.1 Applicability and Responsibilities

Management and supervision shall determine whether contracted work is performed in or near a PSM-covered process or other process area governed by client process-safety rules. Employees and subcontractors shall follow the host employer's safe-work practices, permit systems, emergency procedures, access restrictions, and hazard-control requirements applicable to the assigned scope.

53.2 Process Hazard Information and Orientation

Before work begins, affected Double H Drilling LLC personnel shall receive information necessary to understand known fire, explosion, toxic-release, chemical, pressure, energy, and other process hazards that may affect their work. Relevant SDS information, alarms, emergency actions, evacuation routes, restricted areas, and client-specific rules shall be communicated during orientation, pre-job planning, JSA/JHA review, or other required training.

53.3 Safe Work Practices and Permits

• Required permits and authorizations shall be obtained before performing covered work, including hot work, confined-space entry, line opening, excavation, electrical work, or other activities controlled by the host employer.

• Employees shall comply with lockout/tagout, line and equipment isolation, gas testing, ignition-source control, PPE, respiratory protection, barricading, and access-control requirements applicable to the work.

• Work shall stop when required safeguards are not in place, conditions change materially, an alarm occurs, or employees do not understand the hazards or required controls.

53.4 Training and Competency

Employees assigned to PSM-related work shall be trained in the work practices necessary to safely perform their duties and in applicable emergency actions. Specialized work shall be performed only by employees who possess the training, qualification, certification, or authorization required by law, the client, and Double H Drilling LLC. Training shall be documented.

53.5 Incident Reporting and Investigation

Employees shall immediately report incidents, near misses, releases, unexpected process conditions, damaged safeguards, and deviations from approved work practices. Double H Drilling LLC shall cooperate with the host employer in investigations applicable to contractor work and shall implement assigned corrective actions. The incident-management and investigation requirements elsewhere in this handbook remain applicable.

53.6 Management of Change and Changes in Work

Double H Drilling LLC employees shall not independently alter process equipment, piping, instrumentation, safeguards, operating conditions, chemicals, approved procedures, or the authorized scope of work. Proposed changes affecting the process or work method shall be communicated to the host employer and processed through the applicable management-of-change, engineering, permit, or authorization process before implementation.

53.7 Emergency Planning

Employees shall understand site alarms, reporting methods, evacuation routes, muster locations, emergency contacts, and shutdown or evacuation responsibilities applicable to their assigned role. Double H Drilling LLC personnel shall not perform emergency-response duties beyond their level of training and authorization.

53.8 Contractor Coordination and Records

Double H Drilling LLC shall provide required employee training and performance information to the host employer when appropriate, communicate relevant process-safety information to affected employees, maintain applicable training and qualification records, and periodically review compliance with this policy and client requirements.

53.9 Reference

Where applicable, this program shall be administered consistent with OSHA 29 CFR 1910.119 and applicable state-plan, client, and site-specific requirements. More protective client or site requirements shall be followed.

54.0 Craft Skills Training Program and Policy

Purpose. Double H Drilling LLC shall provide a written, documented craft-skills training program to help ensure employees possess the knowledge, practical skills, and demonstrated competency necessary to safely perform assigned work. Training and qualification shall be appropriate to the employee's craft, experience, assigned tasks, equipment, hazards, and applicable client requirements.

54.1 Scope

This program applies to employees performing drilling, excavation, utility, pipeline, telecom, fiber, cable, equipment operation, maintenance, welding/cutting where applicable, material handling, and other construction or field activities for Double H Drilling LLC.

54.2 Initial Skills Assessment

• Review the employee's claimed experience, prior training, licenses, certifications, and qualifications relevant to the assigned craft.

• Identify the tasks and equipment the employee will be expected to perform or operate.

• Determine training gaps and the level of supervision required before independent work.

• Do not use work history alone as proof of competency when a regulation, client rule, company program, or covered task requires a specific evaluation, certification, or qualification.

54.3 Training Methods

Training may include classroom instruction, manufacturer information, demonstrations, videos, toolbox instruction, supervised on-the-job training, mentoring, hands-on practice, written or oral knowledge checks, and practical performance evaluations. Training shall be delivered in a manner the employee can understand.

54.4 Core Craft-Skills Topics

• Hazard recognition, JSA/JHA participation, stop-work responsibility, PPE, hand and power tools, material handling, housekeeping, and emergency expectations.

• Safe operation and pre-use inspection of equipment the employee is assigned to operate, including applicable drilling, excavation, lifting, support, and utility-construction equipment.

• Drilling and bore-work fundamentals, including work-zone control, rotating-equipment hazards, pinch points, stored energy, tooling, locating/utility considerations, and manufacturer limitations applicable to the assigned equipment.

• Excavation and ground-disturbance skills, including utility locating, soft excavation where required, competent-person controls, access/egress, spoil placement, protective systems, and changing ground conditions.

• Utility, communications, telecom, fiber, and cable installation practices applicable to the employee's assigned work, including protection of existing facilities and task-specific client requirements.

• Hot work, welding, cutting, coating, electrical, rigging, signal-person, confined-space, or other specialized skills only when applicable to the employee's assignment and after required qualification or authorization.

54.5 Hands-On Demonstration and Competency Verification

Before an employee is released to independently perform a craft task, a qualified supervisor, trainer, evaluator, or other designated competent individual shall verify that the employee can safely demonstrate the essential skills required for the assignment. Evaluation may include equipment inspection, setup, operation, hazard recognition, procedural compliance, shutdown, emergency response, and care of tools or equipment as applicable.

54.6 Supervised Field Training

Employees who have not yet demonstrated competency shall work under appropriate supervision. Short Service Employees shall also comply with Sections 30.0 and 52.0. Supervision shall continue until the employee demonstrates the knowledge and skill necessary for the assigned task and all required qualifications have been completed.

54.7 Retraining

Retraining or reevaluation shall be provided when an employee is assigned a new task or equipment; procedures, equipment, or hazards materially change; a client requires additional training; an incident, near miss, audit, or observation indicates a deficiency; a required qualification expires; or management has reason to believe the employee lacks the knowledge or skill to safely perform the work.

54.8 Training Records

Double H Drilling LLC shall maintain training and qualification records appropriate to the program. Records should identify the employee, training or skill evaluated, date, trainer/evaluator, method of training or evaluation, and completion or qualification status. Licenses, certifications, operator qualifications, and client-required credentials shall be maintained or made available as required.

54.9 Employee and Supervisor Responsibilities

Employees shall perform only work they are trained, qualified, and authorized to perform; follow established procedures; ask for instruction when uncertain; and immediately report unsafe conditions or skill gaps. Supervisors shall assign work consistent with employee competency, verify required qualifications, provide or arrange needed training, and remove employees from tasks they cannot safely perform.

54.10 Program Review

Management and the Safety Department shall periodically review the craft-skills training program and revise it when work scopes, equipment, regulations, client requirements, incidents, or observed performance indicate a need for change.

55.0 CYBERSECURITY AND INFORMATION SECURITY POLICY

Double H Drilling LLC is committed to protecting company, employee, customer, contractor, and project information from unauthorized access, disclosure, alteration, destruction, theft, or disruption. Cybersecurity is the responsibility of every employee who accesses company information, email, computers, mobile devices, cloud services, customer systems, project documentation, or other electronic resources.

55.1 Cybersecurity Training

Cybersecurity awareness training shall be incorporated into Double H Drilling LLC's initial employee orientation. New employees shall complete required cybersecurity training before being provided access to company computer systems, email, applications, or other protected electronic resources. All affected employees shall complete cybersecurity refresher training at least annually. Additional training may be required following a cybersecurity incident, significant change in technology, identification of a new threat, or when management determines additional instruction is necessary. Training shall be documented and records maintained by Double H Drilling LLC.

55.2 Cyber Threat Awareness

Employees shall be trained to recognize, prevent, and report cyber threats including phishing; spear phishing; smishing; vishing; business email compromise (BEC); social engineering; malware; ransomware; viruses, worms, Trojans, and spyware; credential theft and account takeover; password attacks; malicious or suspicious websites and links; malicious attachments and downloads; spoofing and impersonation; QR-code phishing; unauthorized remote access; network and Wi-Fi threats; USB and removable-media threats; lost or stolen devices; insider threats; data theft or unauthorized disclosure; cloud and file-sharing threats; artificial intelligence and deepfake impersonation; denial-of-service and other network attacks; and physical security threats involving computers, devices, offices, job trailers, records, or other locations containing sensitive information.

55.3 Usernames and User Accounts

Each authorized user shall be assigned or required to maintain an individual username or account when supported by the applicable system. Employees shall not share usernames, passwords, authentication codes, or accounts with other persons. Shared accounts shall not be used when individual user accounts are available unless specifically authorized by Double H Drilling LLC management or the system administrator. Access shall be limited to information and systems necessary for the employee's assigned duties.

55.4 Password Requirements

Passwords used for company systems shall be unique to the individual user; be at least 12 characters long when supported by the system; use a strong combination of characters or a secure passphrase; not contain easily guessed information; not be shared with coworkers or unauthorized persons; not be reused across company and personal accounts; and be changed immediately whenever compromise is known or suspected. Multi-factor authentication (MFA) shall be used whenever required by the company, customer, application, or system and should be enabled whenever available. Employees shall never provide an MFA authentication code or approve an unexpected login request.

55.5 Phishing and Suspicious Communications

Employees shall exercise caution with unexpected emails, text messages, telephone calls, QR codes, links, attachments, login requests, payment instructions, and requests for sensitive information. Employees shall verify unusual or sensitive requests through an independently established method of communication before taking action and shall not rely solely on contact information contained in a suspicious message. Particular caution shall be exercised when a communication requests passwords or authentication codes, immediate or secret action, wire transfers or payments, changes to banking or payment information, purchase of gift cards, opening an unexpected attachment, clicking an unfamiliar link, providing employee/customer/project information, or bypassing normal company procedures.

55.6 Company Devices and Information

Company computers, phones, tablets, electronic storage devices, email accounts, applications, and networks shall be used in a manner that protects company information. Employees shall not intentionally disable security software or security controls without authorization. Software and applications shall only be installed when authorized. Company and customer information shall not be transferred to unauthorized personal email accounts, personal cloud storage, removable media, applications, or other unapproved locations. Devices shall be locked or otherwise secured when unattended. Lost or stolen company devices shall be reported immediately.

55.7 Cybersecurity Incident Reporting and Employee Response

Employees shall immediately report any known or suspected cybersecurity incident to their supervisor or designated Double H Drilling LLC management representative. Examples include clicking a suspected malicious link; opening a suspicious attachment; providing credentials to a suspicious website or person; unexpected MFA requests; suspected phishing or impersonation; malware or ransomware warnings; unusual computer behavior; unauthorized account activity; lost or stolen devices; unauthorized disclosure of company or customer information; suspected account compromise; or any other suspected cybersecurity event. Employees shall not attempt to investigate, delete evidence, negotiate with an attacker, pay a ransom, or independently contact the suspected attacker. When instructed or when reasonably necessary to prevent continued compromise, the affected device should be disconnected from network connections without destroying or altering potential evidence.

55.8 Company Incident Response

Upon notification of a suspected cybersecurity incident, Double H Drilling LLC management or its designated technology/security representative shall evaluate the event and take appropriate actions, which may include containing or isolating affected accounts, systems, or devices; resetting passwords and authentication credentials; preserving relevant emails, messages, logs, files, and other evidence; determining what systems, accounts, information, employees, customers, or projects may have been affected; removing malicious software or unauthorized access; restoring affected systems and information from trusted sources or backups; coordinating with customers, technology providers, insurance representatives, legal counsel, law enforcement, or other appropriate parties when required; completing required notifications when applicable; documenting the incident and corrective actions; and reviewing the incident to identify improvements necessary to prevent recurrence.

55.9 Employee Separation and Access Control

When an employee or authorized user no longer requires access, Double H Drilling LLC shall remove or disable access to company systems, accounts, applications, and information as appropriate. Company devices, electronic records, credentials, access devices, and other company property shall be returned when required.

55.10 Compliance

Failure to follow cybersecurity requirements may result in suspension or removal of system access and may be addressed under applicable company disciplinary procedures. All employees are expected to immediately report suspected cyber threats or incidents. Prompt reporting is encouraged even when an employee believes they may have accidentally caused or contributed to the incident. Cybersecurity depends on early recognition, immediate reporting, and coordinated response.