Lewis Energy Group®

HSE Handbook

Lewis Energy Group
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I. Lewis Resource Management[1] Health, Safety and Environmental Policy

Our Team Members are our most valuable resource and no phase of business is of greater importance than their personal safety. At Lewis Resource Management, we believe all accidents are preventable, and that safety is an integral part of everyone's job. Each level of management is responsible for demonstrating safety leadership, providing a safe work environment and promoting safety as a value. This safety handbook will guide our daily operations in our business endeavors. Lewis Resource Management will:

1. Advise each manager, supervisor, and Team Member of safety, health and environmental requirements and hold them accountable for their performance.
2. Design and manage operations to minimize environmental and human health impacts and provide work places free of recognized safety hazards.
3. Comply with all laws and regulations governing safety, health and environmental protection.
4. Recognize the importance of safety, health and environmental factors where there is competition with economic factors.
5. Provide professional staff to support safety, health and environmental protection.
6. Monitor, evaluate and report performance in safety, health and environmental protection.
7. Provide training needed to protect Team Member injury/illness, negative environmental impact and physical loss.
8. Participate in programs designed to enhance knowledge and awareness regarding laws and regulations.

Every Team Member has the responsibility and the obligation to prevent accidents and injuries by observing established work procedures, by following the directions of supervisors, by implementing the principles taught in safety training, and by sharing ideas that may further strengthen our safety efforts. LRM believes that no business objective is so important that it cannot be accomplished safety.

Rod Lewis
CEO
Lewis Resource Management

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[1] "Lewis Resource Management (sometimes referred to as "LRM") is a subsidiary of Lewis Energy Group (sometimes referred to as "LEG") and any policies and procedures referring to one or the other of LEG or LRM shall apply to both"

II. Responsibilities for Health, Safety and Environmental

Safe Conduct:

Safe conduct of operations is a condition of employment at Lewis Resource Management. All Lewis Resource Management Team Members are responsible for performing duties in a safe manner in order to prevent accidents and injuries to themselves or others. **Our work is never so urgent or important that we cannot take the time to do it safely.**

Prior to beginning any job, task, operation, or activity Team Members must:

1. Understand the safe working conditions of the job by participating in pre-job planning meetings where task specific procedures or job safety analyses (JSA's) are developed and reviewed.
2. Asking for explanation of special hazards or risks associated with unfamiliar or hazardous activities.
3. Assess the hazards of risk involved in the job and implement appropriate safety precautions before, during and after the job.
4. Identify and communicate hazards or risks to other personnel during work activities.

Manager/Supervisor Responsibilities

The manager/supervisor is responsible for giving safety and loss prevention primary consideration with other factors that affect daily business decisions. In doing so, they should project an attitude that **"all injuries can be prevented".**

All are responsible for actively supporting safety and loss prevention performance in their departments by:

1. Determining Team Member accountability.
2. Communicating safety rules and standards when and where necessary.
3. Providing safe examples.
4. Managing safety rules and standards.
5. Reporting incidents, injuries and serious potential incidents.
6. Assist in correcting unsafe conditions.
7. Attending regular safety meetings.
8. Provide site and equipment specific training.

Management, through safety, provides the tools to LRM personnel necessary for a safe working environment. These tools include required safety training, operations training, and safe equipment.

Management will promote a work culture that identifies safety issues and mitigation techniques prior to starting work activities.

Team Member Responsibilities

Each Team Member must have a positive attitude toward injury prevention and safety. The Team Member should believe that all injuries can be prevented and act accordingly. The Team Member responsibility is:

1. Performing the job safely, for personal safety, fellow workers safety and protection of facilities. This includes the proper use of safety equipment and devices as well as safe work practices.
2. Intervene when observing hazards or unsafe behaviors in the workplace and implement **"Stop Work Authority"** if necessary.
3. Reporting every injury, as well as unsafe conditions or practices (including contractors), to their supervisor.
4. Participate in a pre-job safety meeting prior to every job to include a systematic review of work to be performed and discussion of injury prevention techniques such as:
    a) Proper selection, use and care of the personal protective equipment needed;
    b) Positioning yourself to perform work so that hands, arms, fingers, and feet stay out of the line of fire;
    c) Proper selection, use and care of tools and equipment to perform the job; and
    d) Reviewing, understanding and following proper procedures to perform the job.
5. Assisting in reporting incidents, injuries and potential incidents, and
6. Reviewing and becoming familiar with the contents of pertinent safety manuals, handbooks, and publications i.e., Procedures Manual.

Contractor/Subcontractor Responsibilities

Subject to any terms set forth in any separate agreement and/or Master Service Agreement (MSA) between LRM and contractor, Contractors shall take all necessary precautions for the safety of all persons on the worksite. Contractors shall comply with all LRM safety rules and regulations and applicable Federal, State and local safety laws, rules and regulations necessary to prevent injury to persons or damage to property.

1. Supplying competent and experienced personnel that are physically fit and properly trained to perform assigned job duties and can provide adequate documentation of the training upon request.
2. Complying with all applicable local, state and federal regulatory requirements
3. Adopting safety standards and procedures equivalent to or exceeding those applicable to Lewis Resource Management Team Members.
4. Ensuring that equipment and machinery is:
    a) Maintained in safe running order
    b) Inspected regularly to ensure safe, continued operation.
    c) Does not have leaks that will contaminate the environment.
    d) Not operated by contractor or subcontractor personnel.
5. Providing and maintaining necessary personal protective equipment (PPE) for their Team Members.
6. Reporting to a LRM representative ALL injuries, accidents, spills, near misses, anomalies or hazardous situations as soon as practical but in all cases within 24 hours of occurrence.

7. Cooperating with LRM'**s** investigation of any injuries, accidents, spills, near misses, anomalies and hazardous situations.
8. All personnel shall participate in emergency response exercises (including evacuation drills) when working on a LRM operated facility at the time of the drill.

III. Emergency Preparedness:

Lewis Energy Group (LEG) maintains an Emergency Action Plan (EAP) as a guide to direct the safe, timely and effective response to incidents which can result in injury to Team Members/contractors, damage to LEG equipment and facilities or threaten the general safety, health and environment of the community. The EAP was developed and implemented in accordance with CFR 1910.38 and 1910.119, Process Safety Management (PSM); and 1910.120q, Hazardous Waste Operations and Emergency Response (HAZWOPPER). **The Emergency Action Plan (EAP)** ensures timely and effective action if the following events occur at Lewis Resource Management operated locations/facilities:

1. Evacuation
2. Building Fire
3. Fluid Chemical Release/Spill/Toxic Release
4. Medical Emergency
5. Natural Disaster
6. Rescue and Medical Duties
7. Active Shooter
8. Bomb Threat

The following training levels are part of emergency response under OSHA's, HAZWOPER standard:

First Responder Operations Level. This training level allows the trained Team Member to respond in a defensive manner (only isolate and secure the site).

Hazardous Material Technician. This training level allows trained Team Members to respond in an offensive manner to close valves, extinguish fires, etc.

Incident Commander. This training level allows trained Team Member(s) to set priorities, organize the incident response teams and implement the action plan for all aspects of the emergency response.

Team Members must adhere to the Emergency Action Plan Standard Operating Practice (SOP).

First Aid, CPR Responders, Blood borne Pathogens:

First aid is the immediate, temporary care given to a victim of an accident or sudden illness until the services of a licensed health care provider are available. First aid must be limited only to that treatment which is necessary to prevent death or further injury, relieve pain and prevent or reduce shock. In the event that a Team Member does decide to provide basic first aid or life support assistance to an injured person, some basic steps to remember are:

1. Treat the most serious conditions first: airway, breathing, circulation (ABC), bleeding and shock.

2. Send for land based or air ambulance depending on severity of injury/illness.
3. Try to locate all injuries.
4. Move victim only if he/she is in immediate danger.
5. If poisonous or suffocating gases may be present, do not attempt a rescue without a supplied air respirator.
6. If First Aid/CPR is rendered, protect yourself, apply universal precautions such as body fluid barriers and gloves and wash hands thoroughly afterwards.

First Aid Kits:

First Aid supplies will be available for Team Members who work on LEG properties. The following table lists the required supplies for each type first aid kit:

Classes of First Aid Kits and Required Supplies

First Aid Supply	Minimum Quantity		Size and Volume
	Class A, Type IV	Class B, Type I	
Adhesive Bandage	16	50	1" X 3"
Adhesive Tape	1	2	2.5 yd. (total)
Antibiotic Application	10	25	0.14 fl. Oz.
Antiseptic	10	50	0.14 fl. Oz.
Breathing Barrier	1	1	
Burn Dressing (Gel soaked)	1	2	4" X 4"
Burn Treatment	10	25	1/32 oz.
Cold pack	1	2	4" X 5"
Eye covering	2	2	2.9 sq. in.
Eye/skin wash	1 fl. oz. (total)	4 fl. oz. (total)	
Scissors	1	1	
Splint	0	1	4.5" X 24"
Sterile Pad	2	4	3" X 3"
Tourniquet	0	1	1" (width)
Trauma pad	2	4	5" X 9"
Triangular bandage	1	2	40" X 40" X 56"
First aid guide	1	1	
Hand sanitizer	6	10	1/32 oz.
Medical exam gloves	2 pair	4 pair	
Roller bandage	1	2	2" X 4yds.
Roller bandage	0	1	4" X 4yds.

Class A, Type IV – Field (vehicle), Blue jacket

Class B, Type I – Office Stationary

Each person assigned first aid kits is responsible for the maintenance of supplies in the kits. Restock items are available through facilities or Medsafe.

Training:

All field personnel will receive training in First Aid. Re-certification is required at least every two years. Field personnel will receive training in CPR and re-certified annually. If a Team Member administers first aid, while at work, exposure to human blood or potentially infectious materials occurs, that Team Member will have post-exposure vaccinations and medical evaluations made available to them.

Emergency Response Quick Reminder:

1. Notification of Incident
2. Account for all Personnel/Witnesses
3. Isolate Areas and Limit Access
4. Set Up Incident Command on Site
5. Notification of LRM Emergency Operations Center of Incident
6. Perform Hazard Assessment
7. Gather Potential Equipment to Mobilize
8. Secure Physical Evidence
9. Make Family Contact (Corporate Management Team)
10. Notify Regulatory Agencies (Corporate Management Team)
11. Fill out Event Log as things happen
12. Prepare for Media Response (Corporate Management Team)

Emergency Phone Numbers/List of Contacts:

Emergency phone numbers will be available for each Business Unit. The list will include Regulatory agencies, Sheriff, Ambulance, hospital, and personnel on-call.

Lewis Resource Management (LRM) Emergency Operations Center (EOC)

EOC	210-384-5000
LEG Security	956-324-8423

Ambulance

Medical Emergency	**911**
EMS Cotulla	830-879-3331
EMS Laredo	956-725-4461
EMS Pearsall	830-334-3617
EMS Carrizo Springs	830-856-5800
Halo-Flight	

Hospitals / Clinics

Laredo Occupational Clinic	956-568-3638
Doctor's Hospital Laredo	956-523-3000
Frio Regional Hospital (Pearsall)	830-334-3617

Sheriff/Police Departments

Police Emergency	911
LEG Security – Guard Shack	956-728-6006 956-728-5996
LEG Security – Robert Hunter	956-728-5947
Border Patrol Laredo	956-764-3200
Border Patrol Cotulla	830-879-3051
Border Patrol Carrizo Springs	830-876-3557
DPS Laredo	956-728-2200
DPS San Antonio	210-531-2200
Sheriff Webb Co.	956-722-1793
Sheriff La Salle Co.	830-879-3041
Sheriff Zavala Co.	830-374-3615
Sheriff Frio Co.	830-334-3311
Sheriff Dimmit Co.	830-876-3508

Fire Departments

Fire Emergency	**911**
LaSalle County Fire & Rescue (Cotulla)	830-483-5166
Fire Department Laredo	956-795-2150
Fire Department Pearsall	830-334-2122

National/State Agencies

Name	Phone #
TXDOT (Laredo general Info)	956-712-7400
EPA (Environmental Protection Agency – Region Six)	800-887-6063
OSHA (San Antonio)	210-472-5040
Poison Control Hotline	800-222-1222
Texas One call	811
Railroad Commission of Texas	512-463-6788
Center For Disease Control (CDC)	800-232-4636
Union Pacific Railroad Emergency	888-877-7267

IV. Health, Safety and Environmental Guidelines:

Safety Policy Statements:

LEG has established General safety policy statements for Team Members to use with specific Standard Operating Practices (SOPs) to guide their daily operations.

1. Abrasive Blasting:

Abrasive blasting uses compressed air or water to direct a high velocity stream of an abrasive material to clean an object or surface, remove burrs, apply a texture, or prepare a surface for the application of paint or other type of coating. Abrasive blasting operations can create high levels of dust and noise. Abrasive material and the blasted surface may contain toxic materials (e.g., lead paint, silica) that are hazardous to Team Members. Each abrasive blasting operation is unique, involving different surfaces, coatings, blast material, and working conditions. Before beginning work, Team Members should identify the hazards and take corrective actions to eliminate them. Use engineering and administrative controls, and/or personal protective equipment (PPE), to protect workers involved in abrasive blasting activities.

2. Assured Equipment Grounding:

Occupational Safety Health Administration (OSHA) ground-fault protection rules and regulations have been determined necessary and appropriate for Team Member safety and health. Lewis Energy Group has a responsibility to provide either: (a) ground-fault circuit interrupters on construction sites for receptacle outlets in use and not part of the permanent wiring of the building or structure; or (b) a scheduled and recorded assured equipment grounding conductor program on construction sites, covering all cord sets, receptacles which are not a part of the permanent wiring of the building structure, and equipment connected by cord and plug which are available for use or used by Team Members.

LEG will establish and implement an assured equipment grounding conductor program (A.E.G.C.P.) on sites covering all cord sets, receptacles which are not a part of the permanent wiring of the building or structure and equipment connected by cord and plug which are available for use by field Team Members. This procedure will apply to all sites not equipped with ground fault circuit interrupters in accordance with OSHA 29 Code of Federal Regulations (CFR) 1926.400 and OSHA 29 CFR 1910.399. LEG retains the authority to designate that certain jobs comply with regulation 1926.404(h) by use of ground fault circuit interrupter's in lieu of the assured equipment grounding conductor program.

3. Audits and Inspections:

Lewis Energy Group (LEG) has implemented a program to identify, correct, and control hazards within each Business Unit (BU). This program will utilize multiple resources to ensure effectiveness.

Safety inspections are conducted as necessary to maintain compliance with regulatory agencies. The frequency of inspections is dependent upon regulatory requirements (i.e., DOT drivers conduct daily pre-trip inspections on vehicles, inspect fire extinguishers monthly and forklift, man-lift, fall protection and respirators prior to use). Document

Safety Inspections and corrective actions taken prior to equipment use, or take the equipment out of service until corrective actions are implemented.

Safety Audits are conducted on a quarterly basis for each facility within the BU. The LEG Safety Department will conduct the audits with assistance from the BU managers and Team Members. Document all audits in the I-Auditor Safety Folder on the internal K-drive.

4. Behavior Based Safety (BBS):

Behavior Based Safety (BBS) is an observation/feedback process that concentrates on the actions of people during work activities. Pointing out to Team Members how they contribute to a safe work environment by informing them when they are performing safe or unsafe acts, can be an essential part of a system that contributes to a healthy safety culture. A BBS process encourages Team Members to change unsafe behaviors through positive interaction and reinforcement.

1. Feedback is essential.
2. Behavior causes accidents.
3. Consequences motivate behavior.
4. Observe – Measure – Manage.
5. Communication is the key.
6. Participation creates ownership.
7. Improvement requires teamwork.

5. Compressed Gas Cylinders:

Team Members should be familiar with the chemical, physical and environmental hazards associated with compressed gas cylinder contents. All compressed gas cylinders must be stored appropriately, have proper content labeling, have a current hydrostatic test date, and returned to the vendor with all original accessories and parts. Information on the specific gas within the cylinder will be located in the product labeling and Safety Data Sheet (SDS). Team Members will review and understand the recommendations for the safe handling, storage, use, and Personal Protective Equipment (PPE) requirements when handling compressed gas cylinders. No Team Member shall use any compressed gas cylinder without training in the safe use of these cylinders and gasses contained within.

6. Confined Space Entry:

A **confined space** is any space that meets the following criteria:

1. Is large enough and so configured that a person can bodily enter and perform assigned work.
2. Has limited or restricted means of entry or exit.
3. Not designed for continuous personal occupancy.

A **permit-required confined space** has one of the following characteristics:

1. Contains or has a potential to contain a hazardous atmosphere.
2. Contains a material that has the potential for engulfing an entrant.
3. An internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls, or by a floor sloping downward and tapered to a smaller cross-section.
4. Contains any other recognized serious safety or health hazard.

Lewis Energy Group's (LEG's) Confined Space Program is designed to prevent unauthorized entry ensure safe entry into confined spaces and for work within a permit-required confined space by authorized Team Members. **Team Members must abide by the Confined Space Standard Operating Practice (SOP).**

7. Contractor Management:

All contractors and subcontractors that provide service work on Lewis Energy Group (LEG) Properties will comply will the following:

1. Executed master service agreement (MSA) with LEG.
2. Comply with all Environmental, Health and Safety laws and regulations.
3. Adopt safety practices equivalent to or exceeding those applicable to LEG Team Members.
4. Limit the number of short service Team Members on field crews.
5. Inspection of equipment and machinery on a regular frequency.
6. Report all on the job, contractor job injuries, accidents and near misses that occur while working for LEG.

8. Drug and Alcohol Policy:

It is the continuing policy of the company to provide a safe and healthy workplace for all Team Members. Consistent with this policy is a commitment to maintain all Company Premises free from the adverse effects of drugs and alcohol. Company Premises as used herein include, but are not limited to Company owned, rented, used or leased property including field locations, work sites, drilling locations, offices, parking lots, grounds, vehicles or equipment. Likewise, all Team Members on duty are prohibited from using or being under the influence of illegal drugs, alcohol, or prescription drugs not prescribed by a medical provider.

It is also our continuing policy to employ only those contractors in compliance with the requirements of all federal and state regulations regarding pipeline safety and drug testing.

9. Electrical Safety:

Electrical Safety applies to all Lewis Energy Group (LEG) Team Members/contractors working on LEG properties. LEG business units (BU's) and contract companies working at LEG facilities are responsible for ensuring that electrical equipment installed

according to National Electric Code (NEC) specifications, meets applicable classifications for the specific area, and is in safe working condition.

Classification of Electrical Workers recognized by LEG include:

1. **Qualified Team Member** (also commonly known as certified electrician) can service, debug, install, and maintain electrical equipment as indicated by their training and competency to work on or near exposed energized parts located on LEG properties and locations.
2. **Unqualified Team Member** includes personnel who cannot service, debug, install or maintain electrical equipment on LEG properties and locations.

Team Members must adhere to the Electrical Standard Operating Practice (SOP).

10. Emergency Action Plan:

Lewis Energy Group (LEG) maintains an Emergency Action Plan (EAP) as a guide to direct the safe, timely and effective response to incidents resulting in injury to Team Members/contractors, damage to LEG equipment and facilities or threaten the general safety, health and environment of the community. The EAP was developed and implemented in accordance with CFR 1910.38 and 1910.119, Process Safety Management (PSM); and 1910.120q, Hazardous Waste Operations and Emergency Response (HAZWOPPER). **Team Members must adhere to the Emergency Action Plan Standard Operating Practice (SOP).**

11. Excavation:

An **excavation** is any man made cut, cavity, trench or depression in the ground formed by earth removal. Site grading (normal road or pad smoothing) does not fall within the definition of excavation. One Call procedures must be followed for any excavation not performed by hand tools. **Team Members must adhere to the Excavation Program Standard Operating Practice (SOP) and must utilize and execute upon a "Work Permit" when applicable as per the SOP.**

12. Fire Prevention and Protection:

"Lewis Energy Group (LEG) fire prevention and protection begins in the workplace. Team Members/contractors can make a significant contribution to fire prevention and protection by keeping their workplace clear of trash, scrap, and waste materials. Understanding the types of fire extinguishing equipment is an important part of fire extinguishment and personal protection. All Team Members/contractors shall be familiar with the operations, application, and maintenance of the types of fire extinguishers used at LEG facilities. Fire protection is available at all LEG locations and properties as deemed necessary by applicable codes and regulations. Appropriate LEG Team Members receive training on fire prevention and protection".

LEG is committed to minimizing the threat of fire that could affect Team Members, contractors, visitors, and property. LEG complies with applicable laws, regulations,

codes and good practices pertaining to fire prevention. LEGs separate Emergency Action Plan (EAP) spells out the procedures for responding to major fires. The EAP is stored electronically on the LEG Team Member Portal under Safety SOPs and Forms. **Team Members must adhere to the Fire Prevention and Protection Standard Operating Practice (SOP)**

13. Fit for Duty:

Lewis Energy Group (LEG) Team Members must be able to perform their job duties in a safe, secure, productive, and effective manner, and remain able to do so throughout the entire time they are working a shift for LEG. Team Members who are not fit for duty may present a safety hazard to themselves and to other Team Members. LEG Team Members/contractors shall be in a physical, mental and emotional condition that enables the Team Member to perform essential tasks of his or her work assignment. Performing essential tasks must be in a manner that does NOT threaten the safety or health of oneself, other Team Members, property or the public at large. Team Members must also follow and be familiar with the LEG "Drug and Alcohol Policy Statement".

14. Hand and Power Tools:

LEG Team Members/Contractors are responsible for inspecting and maintaining hand and power tools, to include electrical, pneumatic, fuel powered and hydraulic tools, in a safe operating condition as per manufacturer's recommendations. Portable electrical tools must be double insulated, approved by underwriter laboratories (UL) and protected by the use of Ground Fault Circuit Interrupters (GFCI's). Use non-sparking tools if permitted when flammable gas is detected or suspected.

15. Hazard Communication, Global Harmonious System (GHS):

Lewis Energy Group (LEG) is committed to the prevention of chemical exposures that may result in injury and/or illness. This SOP is designed to ensure the hazards of all chemicals produced or imported are evaluated, and the information concerning their hazards is transmitted to Team Members and contractors by container labeling, safety data sheets (SDS) and training. **Team Members must adhere to the Hazard Communication Standard Operating Practice (SOP).**

16. Hot Work:

Hot work is any work that involves burning, welding, using fire or spark-producing tools, or that produce a source of ignition. Welding and cutting Operations are common to our industry and can be a hazardous operation due to the inherent danger of fire and explosion and the numerous other operations that can occur simultaneously. Hot work will include pre-job planning that includes a task specific, hazard assessment, mitigation and control of the hazards present. **Team Members must comply with the Hot Work Standard Operating Practice (SOP) and must utilize and execute upon a "Hot Work Permit" when applicable as per the SOP.**

17. Housekeeping:

All Team Members should continually perform general housekeeping duties to help ensure and preserve a clean and safe work environment. Use the following common-sense guidelines to help prevent accidents:

1. Responsibility for good housekeeping applies to ingress/egress routes as well as actual work sites.
2. Responsibility for good housekeeping also applies to offices and vehicles.
3. Keep aisles, walkways, stairways and emergency escape routes free of clutter.
4. Clean up spills immediately.
5. Keep work areas clean and free of flammable debris.
6. Prevent oil accumulation on all walking and working surfaces.
7. Pick up trash and place in disposal containers. Do not allow trash to collect anywhere.
8. Store hazardous chemicals and flammable materials in their designated locations and in capped or ventilated containers as required by the Safety Data Sheet (SDS) for chemical(s).
9. Secure gas cylinders and close cylinders valves when not in use.
10. Clean, inspect, and return tools, parts and portable equipment to their designated storage area after each use.
11. Notify the location supervisor of any potential hazards.
12. Clean common areas as necessary to eliminate mold, mildew and fungus.

18. Hydrogen Sulfide:

Lewis Energy Group (LEG) team members and contractors who have the potential for occupational exposure to Hydrogen Sulfide (H_2S), must be informed on the hazard levels of H_2S, the requirements for working safely in these environments, and what to do in an H_2S emergency. All team members and contractors will receive training if they are working at LEG facilities and properties where H_2S is present. **Team Members must adhere to the Hydrogen Sulfide Standard Operating Practice (SOP).**

19. Incident Reporting/Investigation:

LEG has a commitment to provide a work environment where no injury is acceptable and all work activities are undertaken without compromising safety and health. All work related incidents shall be reported to the appropriate Person In Charge (PIC) immediately. An incident is defined by Lewis Energy as an unplanned event that could result in personal injury, vehicle/property damage, a near miss, safety observations, or any situations that impact the environment. Team Members must adhere to this SOP when there is an incident. Contractors must fully cooperate with this SOP while working on LEG properties. **Team Members must adhere to the Incident Reporting and Investigation Standard Operating Practice (SOP) when there is an incident.**

20. Industrial Hygiene:

Lewis Energy Group (LEG) maintains an Industrial Hygiene (IH) program that includes recognizing and controlling workplace conditions that may cause workers injury or illness. Environmental monitoring can detect the extent of Team Members and contractors potential exposure. Implementation of Engineering controls, Administrative Controls, or Personal Protective Equipment (PPE) control potential health hazards to Team Members. Assessments of work areas will occur periodically to help identify hazards (such as toxic chemicals, ventilation problems and noise) so appropriate measures will reduce potential exposure. Team Members receive training to recognize hazards and take appropriate safety measures. Business Units (BU's) conduct hazard assessments to identify potential exposures and take preventative actions.

21. Job Safety Analysis (JSA):

A job safety analysis (JSA) is a process of systematically identifying workplace hazards by breaking down a particular job into a series of relatively simple steps and eliminating hazards and risks before accidents occur. JSAs focus on the relationship between the worker, the tools and the work environment. All Lewis Energy Group (LEG) Team Members and contractors shall perform a Job Safety Analysis (JSA) prior to the start of work. **Team Members will comply with the JSA Standard Operating Practice.**

22. Ladders and Scaffolds

Lewis Energy Group (LEG) will provide safe ladders to be used by team members. LEG will also train all team members in the safe use of the equipment. All team members are responsible for the safe use, storage and inspection of ladders.

23. Lockout Tagout:

Lewis Energy Group's (LEG's) Lockout/Tagout (LO/TO) policy is established to safely isolate potentially hazardous energy sources in the work area during service or maintenance activities. Lockout/Tagout requirements and guidelines will help protect Team Members from injury resulting from the unexpected startup of equipment or machinery or from a sudden release of energy. Contractors must have their own locking and tagging devices and also follow the LEG LO/TO procedures outlined in the SOP, along with other LEG contractor safety requirements. **Team Members must adhere to the Lockout/Tagout Standard Operating Practice (SOP).**

24. Lone Worker:

It is Lewis Energy Group's (LEG's) intention to provide a work environment in which all Team Members who are required to work alone or unsupervised for significant periods of time can do so safely and at minimal risks to themselves and others. LEG business units (BU's) will address situations by developing and communicating procedures as appropriate for their operations. LEG BU's will address situations by developing and communicating procedures as appropriate for their operations.

At a minimum, workers will comply with the following requirements for LEG Team Members who classify as "Lone Worker":

1. Worker will have knowledge and competencies to perform their duties safely;
2. Worker will be aware of the hazards and risks which they could potentially be exposed;
3. Worker will know what to do if an emergency should occur;
4. Worker will inform their Supervisor of their work location, what he/or she is working on and when they should be expected to arrive and leave a work location. The Supervisor may require additional contact from the Team Member to verify their safety.
5. Worker will inform their Supervisor of any medical condition that may have developed which could increase the risk of working alone.

25. Machine Guarding:

All guards shall protect the operator and other Team Members from hazards such as those created by point of operation, ongoing pinch points, rotating parts and flying chips and sparks. All equipment operators are responsible for ensuring guards are adequate and in place. Affix all guards to the machine where possible and secure elsewhere if not feasible to attach to the machine. Use barrier guards in lieu of point specific guards where appropriate. For additional information concerning specific types of machinery, consult 29 Code of Federal Regulations.

26. Material Handling and Storage:

Material handling is the movement, storage, control and protection of materials, goods and products throughout the process of distribution, consumption and disposal. Depending on the material type and the means used to move them, the hazards associated with materials handling and storage can result in serious injury due to employees being struck by or caught between materials, or the material handling equipment. Team Members responsible for materials handling and storage will receive training (i.e. operation of mechanical handling equipment, rigging, material securement, transportation, storage).

Musculoskeletal injuries may also occur, due to repetitive movement or improper techniques used when lifting and moving materials manually. Team Members responsible for manual material handling and storage will receive training (i.e. hand and finger safety, body positioning, and personal protective equipment).

27. Noise Exposure

The LEG noise exposure program is designed to prevent noise induced hearing loss. Team member noise exposure levels shall not equal or exceed an 8-hour time-weighted average of 85 decibels. Lewis Energy Group (LEG) will conduct sound level surveys to determine the noise levels present in their work operations. The results of the sound level survey may warrant additional sampling, with a noise dosimeter, to determine if

Team Members should be subject to additional control measures. The results of the sampling will be documented in the Business Unit specific hazard assessment. Engineering and Administrative controls can be implemented to reduce noise levels in the work environment. High Noise areas shall have signage posted to warn Team Members of protection requirements. Hearing protection will be provided to Team Members to reduce noise exposure to a safe level.

28. Non-destructive Testing:

Personnel, performing radiographic inspection, must be certified Level II or Level III by the American Society for Non-destructive Testing (ASNT). Certification verification is required prior to work performance. A Level I inspector must be supervised by a Level II or Level III inspector at all times. The radiographer must be responsible for protection and monitoring every person working with or near radiation sources. The radiographer must comply with the following:

1. Have a contingency plan in the event of an emergency.
2. Wear a pocket dosimeter at all times.
3. Establish safe boundaries based on the source strength and exposure time.
4. Post radiation caution symbol.
5. Survey the boundary with a calibrated instrument during the initial source exposure to ensure radiation levels less than 2mr/hour.
6. Notify LRM supervisor immediately if any abnormal situation occurs

29. Painting and Coating:

In industry, the most popular method of applying paint is to spray it on, using compressed air, a high velocity airless spray, or an electrostatic applicator. When painting, the hazards are the paints and solvents. Team Members need to recognize and protect themselves against hazards such as vapors, fire and explosion hazards, noise from the use of air powered tools a the proper personal protective equipment (PPE) to be used during painting and coating operations. Team Members will receive training on these and other related topics prior to performing work.

30. Personal Protective Equipment (PPE):

Lewis Energy Group (LEG) Team Members shall access the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of PPE. If such hazards are present, likely to be present, or if it is necessary by reason of process, environmental, chemical, or radiological hazards, or if mechanical irritants could be encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact, protective equipment must be utilized. This protective equipment includes PPE for the eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers. All PPE shall be used and maintained in a sanitary and reliable condition. Team Members/contractors/visitors who have the potential to be exposed to workplace hazards are required to wear the appropriate PPE. All PPE shall be of safe design and

construction for the work to be performed. Contractors shall provide PPE for their personnel while working on LEG properties and meet LEG's PPE requirements at a minimum. **Team Members will comply with the Personal Protective equipment Standard Operating Practice (SOP).**

31. Respiratory Protection:

Lewis Energy Group (LEG) has developed and implemented a written Standard Operating Practice (SOP) for Respiratory Protection. This practice applies to Team Members when respirators are worn to protect worker health from exposure to air contaminants or oxygen deficient atmospheres. All Team Members with work that involves the use of a respirator shall be examined and be medically approved by a physician or licensed health care provider, fit tested with the proper respirator and trained in the proper use and maintenance of respiratory protection equipment. **Team Members must adhere to the Respiratory Protection Standard Operating Practice (SOP).**

32. Safety Meetings:

Safety meetings are conducted before all critical tasks are performed. Safety meetings are an opportunity for Lewis Energy Group (LEG) management and the LEG safety department to communicate to Team Members how they can do their jobs safer. Team Members are required to attend safety meetings to become familiar with the information that will help prevent accidents and injuries and ensure that all work is carried out in a safe manner. Individuals who are unable to attend regularly scheduled safety meetings are responsible for locating their supervisor and reviewing missed meeting materials prior to commencing work. All safety meeting activities and attendance shall be documented.

33. Safety Signs:

Lewis Energy Group (LEG) will provide signage required by State and Federal Regulatory Agencies. Safety signs are used to identify specific hazards associated with LEG properties and work site activities. The information on signage should be presented in a manner the recipient is capable of understanding. Team Members will be provided training on signage displayed at LEG properties.

34. Short Service Employee (SSE):

It is Lewis Energy Group's policy to identify all short service employees and place certain restrictions on their work duties, for a designated time. While Team Members take care to work safely and avoid accidents and injuries, Supervisors will take additional time to introduce Team Members to the LEG safety culture. Short Service Employees (SSE) are those Team Members who have less than six (6) months experience performing the same job type or have less than six (6) months as an employee of the company. This program applies to all company facilities, worksites, departments, teams, Lewis Energy Group (LEG) Team Members who work in field environments. Each SSE will stay in the program until the SSE can demonstrate the knowledge and skills necessary to perform

their job safely. Team Members terminated within one year of re-hire date are exempt from the SSE program. An SSE should be included in this program for at least three months within a six month period, or until the SSE demonstrates the knowledge and skills necessary to perform their tasks safely. Evaluate all SSE's and document their work status before they work without direct supervision. **Team Members must adhere to the Short Service Employee (SSE) Standard Operating Practice (SOP).**

35. Spill Prevention Control and Countermeasures (SPCC):

The Spill Prevention Control and Countermeasures (SPCC) Program is administered by the United States Environmental Protection Agency (USEPA) and establishes procedures, methods, equipment, and other requirements to prevent discharge of oil from non-transportation related onshore and offshore facilities into navigable waterways or adjoining shorelines. The program applies to aboveground oil storage capacity of a single container of 1,320 gallons (32 bbl.) or aboveground container with a storage capacity of 660 gallons (16 bbl.) or greater. Lewis Energy Group shall maintain and execute the SPCC Plan when applicable.

36. Spill Management and Response:

Lewis Energy Group (LEG) requires Team Members to implement proper planning and preventative measures to minimize the likelihood of spills and to implement the Emergency Action Plan (EAP) as needed. IN the event of a spill, LEG Team Members will comply with all federal, state and local rules. Spills and releases will be controlled immediately and cleaned up immediately under supervision of a Health, Safety, and Environmental (HSE) person knowledgeable with the material spilled and the safety precautions to be taken during cleanup operations. Spill will be reported to the regulating agency(s), if required. Site spills with a Spill Prevention Control and Countermeasure (SPCC) plan, will be managed in accordance with the Plan.

37. Stop Work Authority:

Stop Work Authority provides Team Members the ability to stop work when they believe that a situation exists that places them, other Team Members, contract personnel or the public at risk or in danger, and/or if a Team Member is not comfortable that they have enough information to safely execute a procedure or process. This policy extends the authority to stop work in situations where a Team Member believes there is a need to clarify work instructions, or propose additional controls. Team Members are empowered and required to stop work if they believe a situation exists that places them, other Team Members, contractors, the public, property, and/or the environment at risk or danger. When in doubt, a Team Member must Stop Work.

38. Storm Water Management:

Storm Water Management refers to preventing the pollution of water that runs off LEG property due to rainfall, snowmelt or other precipitation events. Pollution can occur either by natural events (e.g., sediment from surface degradation or erosion) or by

manmade events (e.g., free floating oil from past events or spills or chemicals leaking from containers). Certain oil and gas properties are required to obtain a Storm water permit and maintain a Storm Water Pollution Prevention Plan (SWPPP). The following facilities and activities may require a SWPPP and a permit:

1. Construction activities that disturb five or more acres of land Surface. The Federal Storm Water Phase II Final Rules include construction activities equal to or greater than one acre. Disturbance for new Access roads and/or pipelines. The SWPPP must be prepared and a Notice of Intent submitted prior to the start of construction. The federal requirement is 48 hours prior to commencing construction.
2. Oil and gas facilities that had a contaminated storm water event in the past (due to a spill or other release).

39. Toxic Substance Control Act (TSCA)

One of the goals of TSCA is to gather data on, and decrease the effects of toxic substances on human health and the environment. Lewis Energy Group (LEG) is committed to protecting its Team Members, contractors, the general-public and the environment from hazards related to our products or operations. Federal regulatory requirements for recording and reporting harmful effects are covered in Section 8(c) and 8 (e) of the Toxic Substance Control Act (TSCA) which is enforced by the Environmental Protection Agency (EPA).

Section 8(c) – This section requires LEG to maintain records of allegations of harmful effects to health of the environment. These records contain information reported by Team Members and customers. Proof that a harmful effect was caused by a LEG product or operation is not required.

Section 8(e) – This section requires LEG to report to the EPA certain harmful effects to health and the environment have occurred, or are likely to occur from LEG production or operation. These reports represent information reported by Team Members or customers or on studies of health effects conducted by LEG. Under this Section, information is required which reasonably supports the conclusion that a harmful effect has occurred or will occur. Report this information to EPA within 15 days. Display a TSCA poster in locations where notices to Team Members are normally posted, including office bulletin boards.

40. Training:

Environmental, Health and Safety training is provided to all personnel to inform them of regulatory requirements and to share information that will be essential for the elimination of hazards that may cause accidents. See Lewis Energy Group's (LEG's) training matrix for training delivery methods such as Computer Based Training (CBT), LEG Safety, or Third Party (TP) and training frequency requirements.

41. Vehicle Safety:

Vehicle operation is a frequent part of LEG Team Member responsibility with potential exposures to many hazards. Drivers will operate all company owned, leased or rented vehicles in a safe, courteous and law abiding manner. Failure to do so may endanger Team Members, the general public and/or property. All LEG Team Members and contractors are required to operate vehicles within all state and federal laws and regulations and within the HSE Handbook requirements posted on the LEG Team Member Portal, company guidelines, and applicable safety alerts.

42. Walking and Working Surfaces:

Lewis Energy Group (LEG) will construct and maintain all walking and working surfaces free of obstruction. Team Members shall keep these areas free from obstacles and remove hazards to prevent accidents. All Team Members are required to maintain a safe working environment. **Team Members must adhere to the Walking and Working Surfaces Standard Operating Practice (SOP).**

43. Waste Management:

Proper waste management is necessary to protect human health and the environment and to be compliant with current laws and regulations. Depending on the waste classification and type, waste may be hazardous, non-hazardous, subject to recycling or exempt from regulation. Based on the waste classification, a generator will comply with the regulations that apply to waste management. Consult the regulatory team on all waste management matters.

44. Welding, Burning and Grinding:

The safe usage of welding, cutting and grinding equipment by Team Members is necessary for the safety and health of Team Members and for the protection of LEG facilities and operations. Implement appropriate procedures to control welding, cutting, and grinding operations. Train all Team Members that conduct welding, cutting, and grinding operations in the safe operation and maintenance of their equipment and use of personal protective equipment. Designate trained Team Members for authorizing "Hot Work" in areas where potential fire hazards exist. Advise all contractors about hazardous facility conditions and the LEG requirements for conducting "Hot Work" prior to any welding, cutting or grinding operations. When practical, move welding, cutting, grinding, or heating operations to a designated safe location. Another option is to remove fire hazards in the vicinity.

V. Management of Change:

In the interest of developing an avenue for addressing changes in the workplace which could have a negative impact on personnel's safety and health procedures, it is necessary to recommend, receive approval and communicate changes.

It is imperative that all adaptations, alterations, or modifications to operations; applicable to equipment, personnel, or procedures be approved by the appropriate authoritative representative prior to implementation. Adhere to management of change regardless of complexity, duration, or simplicity of the change. Present anticipated changes in written format with an explanation to consequences of the change. Upon receipt of written approval, provide written documents to all affected personnel, which shall include the name of responsible party, anticipated duration of the change as well as the potential effects resultant of the change. Management of change will include training of the change PRIOR to implementation.

Use of the form provided will assist in completion of this task as it contains the essential ingredients necessary to assure adequate coverage of concerns.

NOTICE

Management of Change Form

Name of Person Requesting Change:_____ Date:___/____/_____

Representative of / Department:_____

Request Presented To:_____ Time:____:_____AM/PM

Type of Change Requested

Mark appropriate area of change with "X"

Change to equipment non-OEM:_____

Change to procedure(s) non-SOP:_____

Change of personnel:_____

Change to policy:_____

Reason for Change

_____

_____

_____

Effects of Change

_____

_____

_____

Approx. duration of change:_____

Affected personnel by change: _____

Approved by: _____

Title: _____

VI. Document Control

Version	Change Date	Change Description	Changed by	Approved by	Approval Date
1.3	10/7/19	Update H2S PS, Add Document Control	Colin Clark	Ken P.	10/7/19
1.4	10/8/19	Make Spacing Consistent, add missing PS	Colin Clark	Ken P.	10/8/19
1.5	10/16/19	Reformat to word 2016 and update TOC, new title page, add header	Colin Clark	Ken P.	10/16/19

NOTE: A Sub-Committee will review and document changes and send to the Executive Safety Committee for approval. Document revisions on the above Document Review Change Log to maintain audit compliance.

VII. LEG HSE Forms List (These Forms are Located in the K-Drive):

Incident Investigation Report
Aerial Lift/Forklift Inspection Form
Confined Space Entry Permit
Confined Space Entry Log
Confined Space Hazard Assessment
Excavation Daily Inspection Form
- Table 1. Soil Analysis – Visual tests
- Table 2. Soil Analysis – Manual tests
- Table 3. Maximum Allowable Slope

Excavator Inspection Form
Fall Protection Equipment Inspection
Fire Extinguisher Visual Monthly Inspection
Fire Extinguisher Annual Maintenance Inspection
Hazard Assessment Form
Hazard Assessment - Certification Engineering Controls
Hazard Assessment - Certification Administrative Controls
Hazard Assessment - Certification Personal Protective Equipment
Hazard Assessment PPE Revision
Hot Work Permit
Industrial Hygiene Sample Survey
Industrial Hygiene Activity Log
Industrial Hygiene Pump Calibration Log
Industrial Hygiene Sample Log
JSA Form
LO/TO Energy Isolation Work Plan
LO/TO Log
LO/TO Machine/Equipment Specific Procedures

LOTO Periodic Inspection of Energy Control Procedure
Exchange of Lockout/Tagout Program
SSE Information Form
SSE Mentor Checklist
SSE Supervisor Job Orientation Guide
Short Service Employee Weekly Review Report