



Lewis Energy Group®

STANDARD OPERATING PRACTICE

Hazard Communication (HAZCOM)

Lewis Energy Group
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1.0 Purpose & Policy Statement:

Lewis Energy Group (LEG) prioritizes the safety and well-being of its Team Members. This Standard Operating Practice (SOP) establishes a comprehensive Hazard Communication (HAZCOM) program aligned with the OSHA Hazard Communication Standard (29 CFR 1910.1200). This program aims to empower LEG Team Members with the knowledge and safe handling practices necessary to minimize the risk of accidents and injuries associated with hazardous materials.

LEG Policy Statement

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.

2.0 Applicability:

This SOP applies to all LEG Team Members, contractors, and temporary workers who may encounter hazardous materials during their work activities at any LEG facility. This includes, but is not limited to:

- Team Members involved in the exploration, production, transportation, storage, or distribution of oil and gas.
- Maintenance and operations personnel working with equipment containing hazardous materials (e.g., lubricants, solvents).
- HSE Technicians monitoring for hazardous substances.
- Custodial staff cleaning areas potentially contaminated with hazardous materials.

Contractors performing work for LEG may have their own written HAZCOM program. However, this program must, at a minimum, meet the requirements set forth by OSHA's Hazard Communication Standard (29 CFR 1910.1200). LEG reserves the right to request a copy of the contractor's HAZCOM program for review prior to the commencement of work.

Supervisors and managers hold particular responsibility for ensuring their teams are informed about potential hazards, trained on safe handling procedures, and have access to Safety Data Sheets (SDSs) for relevant materials.

3.0 Requirements/Responsibilities

3.1 Container Labeling

All containers received for use will be clearly labeled in accordance with the requirements of Title 29 CFR 1910.1200, including:

- A product identifier
- Pictogram
- Hazard statement
- Signal word
- Precautionary statements
- The supplier's contact information (name and address)

On the following individual stationary process containers, LEG is using National Fire Protection Association (NFPA) 704 labels to convey the required information on the following containers but is not limited to:

- Condensate storage tanks
- Produced water
- Fuel storage
- Any other stationary containers

Other portable process containers are using a combination of NFPA 704 and the new GHS labels. These containers include but are not limited to:

- Methanol storage
- Chemical totes
- H₂S scavenger
- Fuel storage

The BU Managers and HSE Department will review the company labeling procedures on an annual basis and will update labels as required.

3.2 Safety Data Sheets (SDSs)

LEG ensures easy access to current SDSs for all hazardous materials potentially encountered at LEG sites. These SDSs are maintained electronically on a central platform (MS Teams - LEG Global Team - HSE Channel - Files) for quick retrieval. Additionally, some Business Units (BUs) may choose to keep hard copies of SDSs for reference.

Each BU supervisor is responsible for reviewing the SDSs received for safety and health implications, and initiating any needed changes in workplace practices.

3.3 Team Member Information and Training

All LEG Team Members who encounter hazardous materials will receive comprehensive training on hazard communication within the first 30 days of employment, and at least annually thereafter. The training will include the following information:

- Requirements of the regulation
- Location and availability of Safety Data Sheets (SDS)
- Hazardous chemicals used in the workplace
- Method to detect release
- Physical and health hazards
- Personal protective equipment
- Details and location of the written plan

Prior to introducing a new chemical hazard into any work area, each Team Member in that business unit will be given information and training as outlined above for the new chemical hazard.

3.4 Hazards of Non-routine Tasks

Periodically, Team Members may be required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are confined space entry, hot work, and a pipeline leak, excavation and repair. Prior to starting work on such projects, each

affected Team Member will be given information by their Business Unit or Safety Tech about the hazardous chemicals they may encounter during such activity. This information will include:

- Specific chemical hazards;
- Protective and safety measures the worker should use; and
- Steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another Team Member (buddy system), and emergency procedures.

3.5 Informing Other Employers/Contractors

All contractors performing work at LEG sites are required to have a written HAZCOM program that, at a minimum, meets the requirements of OSHA's Hazard Communication Standard (29 CFR 1910.1200). LEG utilizes ISNetworld, a contractor management platform, to vet the safety policies and procedures of potential contractors. This includes reviewing the contractor's HAZCOM program to ensure its effectiveness.

The Business Unit (BU) supervisor/manager will provide contractors with a list of hazardous chemicals potentially encountered at the specific worksite. This information will be provided before work begins and may include:

- Names of hazardous chemicals
- Associated hazards (e.g., flammability, toxicity)
- Precautionary measures for safe handling
- Required Personal Protective Equipment (PPE)

3.6 List of Hazardous Chemicals

The current list of hazardous chemicals is maintained electronically on a central platform (Microsoft Teams). This allows for easy access, retrieval, and updates. Safety Data Sheets (SDSs) for all listed chemicals are also stored within the same Microsoft Teams folder, ensuring personnel have access to both resources in one location.

When new chemicals are received in the workplace, this list will be updated within (14) days of chemical introduction.

3.7 Program Availability

A copy of this written Hazard Communication SOP will be made available, upon request, to Team Members, their designated representatives, and representatives of OSHA.

4.0 Responsibilities

4.1 HSE Department:

- Maintain the centralized inventory of all hazardous materials used or stored at LEG facilities.
- Collaborate with supervisors and managers to develop and deliver comprehensive HAZCOM training programs.
- Oversee the program's implementation and ensure compliance with regulatory requirements.
- Ensure effective communication of the HAZCOM program throughout the organization.
- Review and approve the HAZCOM program and updates

4.2 Supervisors and Managers:

- Ensure their teams receive HAZCOM training provided by the HSE Department.
- Verify Team Members understand the hazards associated with the materials they work with.
- Enforce safe handling procedures for hazardous materials within their teams.
- Ensure Team Members have access to appropriate PPE and understand its proper use.

4.3 Team Members:

- Participate in HAZCOM training provided by the HSE Department.
- Follow safe handling procedures for hazardous materials as outlined in the program.
- Utilize appropriate PPE as instructed by supervisors and managers.
- Report any incidents involving hazardous materials to their supervisor immediately.

5.0 Definitions:

Hazard Statement – A single harmonized hazard statement for each level of hazard within each hazard class (Example: Flammable liquids:

Category 1: Extremely flammable liquid and vapor

Category 2: Highly flammable liquid and vapor

Category 3: Flammable liquid and vapor

Category 4: Combustible liquid)

Health and Environmental Hazards – acute toxicity, skin corrosion/irritation, serious eye damage/eye irritation, respiratory or skin sensitization, germ cell mutagenicity, carcinogenicity, reproductive toxicity, target organ systemic toxicity (single and repeated dose), hazardous to the environment.

Physical Hazards – explosives, flammability (gases, aerosols, liquids, solids), oxidizers (liquid, solid, gases), self-reactive, pyrophoric (liquids, solids), self-heating, organic peroxides, corrosive to metals, gases under pressure water-activated flammable gases.

Pictogram – means a composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under this standard for application to a hazard category. Where a transport pictogram appears, the GHS pictogram for the same hazard should not appear.

Precautionary Statements – phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling. (Example: wear face protection).

Product Identifier – means the name and number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical. The product identifier used shall permit cross-references to be made among the list of hazardous chemicals required in the written hazard communication program, the label and the SDS.

Signal Word – used to emphasize hazard and discriminate between levels of hazard (i.e. Danger or Warning)

6.0 Document Control Process:

Document Change History

Version	Change Date	Change Description	Changed by	Approved by	Approval Date
1.0	8/20/19	<ul style="list-style-type: none"> - Change Lewis Resource Management to Lewis Energy Group - Change Procedure to Practice - Change Business Objective to Purpose & Policy Statement - Add Policy Statement 	Colin Clark	Ken Phillips	8/20/19
1.1	10/17/19	<ul style="list-style-type: none"> - Change Headings - Change Cover Page - Update TOC 	Colin Clark	Ken Phillips	10/17/19
1.2	5/29/24	<ul style="list-style-type: none"> - Remove LEGs responsibility to train 3rd party - Remove ACR verbiage - Add MS Teams SDS & Inventory 	Colin Clark	Ken Phillips	5/29/24

NOTE: Any document revisions are to be noted on the Document Change Log. This form will be kept current to maintain audit compliance.

Standard Operating Practice – Hazard Communication Program

29 Code of Federal Regulations - 1910.1200

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