GAS AND OIL WELL EMERGENCY RESPONSE PLAN

I. INTRODUCTION

Oil and gas wells present additional environmentally sensitive areas. There are approximately 2,393 oil and gas wells in Trumbull County, as counted in 2001. Update

A. Emergency Response Notification Summary

1. Any person discovering a gas and oil well leak should report the incident by calling their local fire department at 911 or the Trumbull County Emergency Management Agency at (330) 675-6601.

2. If an accident or spill occurs, a notification form and the following system will be used to report the incident:

   a. If the fire department in the political jurisdiction where the incident occurred has been notified, the dispatcher will notify the County Emergency Management Agency. If the fire department received the initial report, then they will advise the County Emergency Management Agency.

      If a local dispatch center is unable to handle the additional local calls then they may request the County Emergency Management Agency to assist.

   b. This plan contains a list of routine phone numbers to call with every response plus a list of special numbers that can be called as needed. Examples of routine calls would include:

      Local Fire Department depending on jurisdiction (911)

      Emergency Management 330-675-2666

      Ohio EPA 1-800-282-9378

      Federal EPA 216-333-7556

	Ohio Dept. of Natural Resources-Oil & Gas Wells	(See table below)

TRUMBULL COUNTY

Oil, Gas, and Mineral Safety	Jerry Kohl, Inspector (North Region) 330-293-4026 (home) 330-896-0616 (office)	Carl Roberts, Backup Inspector (North Region) 330-337-7038 (home) 330-222-1527 (office)	Jay Cheslock, Supervisor 330-343-2374 (home) 330-284-2942 (office)	Thomas Hill, Inspector Coal & Mineral Safety 330-896-0616 (office) 330-283-3204 (home)

c. Each Gas and Oil Well company is responsible for reporting conditions that fall within the parameters of the response levels. The Accident Notification Form will be used to report and record this information.

II. Release Reporting of a Hazardous Substance

The State Emergency Response Commission finalized a set of eight (8) reporting rules (3750-25-01; 3750-25-05; 3750-25-12; 3750-25-15; 3750-25-20; and 3750-25-25), effective June 30th, 1993. The basis of this section is to make you aware of the Gas and Oil Well Company's reporting obligations in case of a discharge or release.

All verbal notification and/or written follow-up reports under the guidance of these rules are to be reported to the Ohio EPA's Emergency Response Section, Local Emergency Planning District(s) which maybe affected and jurisdictional fire department(s).

A Gas and Oil Well Company is required to report a release or discharge under 3750.06 of the Ohio Revised Code anytime there is a release or spill of a regulated chemical, which exceeds its assigned Reportable Quantity (RQ) and leaves the facility property line. The regulated substances referenced are:

1. Materials Subject to Release Reporting

a. Extremely Hazardous Substances 40 CFR; Part 355 Appendix A and B,

b. CERCLA Hazardous Substances 40 CFR Part 302; Table 302.4, and

c. Oil (definition includes; without limitation to gasoline, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other then dredged soil).

d. The Reportable Quantity (RQ) for the discharge of oil including crude oil into or upon navigable waters is an amount which causes a visible film or sheen upon the surface of the water;

e. The RQ for the release of oil into the environment, excluding navigable waters; is an amount of 25 gallons or more;

f. The RQ for the release of crude oil from an oil and gas extraction storage facility into the environment, excluding navigable waters, is 210 gallons.

2. Verbal Notification Requirement

The verbal notification to the fire department, LEPC and Ohio EPA shall be made within 30 minutes of knowledge of the release unless notification within that time frame is impractical under circumstances. In addition, calls to The National Response Center (NRC) shall be made for those reportable quantity releases involving CERCLA hazardous substances or oil to navigable waters as soon as possible. The National Response Center (NRC) 24-hour number is 1-800-424-8802. The release notification for 24-hour reporting of emergencies is:

In Ohio call:

1-800-282-9378

From out of state, or if the 800 number does not work, call:

614-224-0946

Gas and Oil Well companies must be prepared to relay as much of the information listed below as is known or can be estimated at the time of reporting. This is an initial report and estimates can be corrected in the company's follow-up emergency notice report.

a. Name and phone number of the person to contact for further information;

b. Location and source(s) of the release or discharge;

c. Chemical name or identity of any substance(s) involved in the release or discharge;

d. Is the substance an extremely hazardous substance;

e. Estimate of the quantity (gallons or pounds) of discharge into the environment;

f. Time and duration of the release or discharge;

g. The environmental medium or media into which the substance was released or discharged;

h. Potential health effects associated with the release or discharge of the substances;

I. Report precautions taken, including evacuation, remediation, or other proposed response action.

III. CONTINGENCY PLANNING

A. Preparing for Spills

In order to respond rapidly and successfully to an oil spill, personnel responsible for containing and cleaning up the spill must know the steps that need to be followed during and after a spill. Contingency plans describe information and processes for containing and cleaning up an oil spill that occurs in a defined geographic area.

Well-designed local, state, regional, and national contingency plans assist response personnel in their efforts to contain and clean up oil spills by outlining the steps that should be taken before, during, and after an emergency. When used properly by trained personnel, a well-designed contingency plan enables oil spill response efforts to proceed smoothly and effectively, minimizes danger to cleanup personnel, reduces the overall costs of cleanup by avoiding unnecessary effort, and ensures that sensitive habitats are protected.

Because the approaches and methods for responding to oil spills are constantly evolving, and each oil spill provides an opportunity to learn how to better prepare for future incidents, contingency plans also are constantly evolving and improving-assuring increased protection to human health and the environment from these accidents.

B. Well-Designed Contingency Plan

A well-designed contingency plan provides many details about each step involved in preparing for, and responding to, an oil spill. Although each plan differs in its details, contingency plans contain three major elements: Background Information, Spill Scenarios, and Response Actions.

1. Background Information

Specific background information is vital for helping clean-up personnel make reasonable, well-informed choices about how to contain and clean up a spill when it occurs. Such background information should include:

a. Names and phone numbers of individuals who work with private companies or local, state, and federal agencies who are responsible for helping with oil spill cleanup efforts;

b. Descriptions of physical, chemical and biological techniques that can be used to contain or clean up an oil spill;

c. Lists of response equipment available in the area;

2. Spill Scenarios

It is impossible to know when an oil spill is going to happen and how much oil is likely to be spilled. Sometimes oil spills occur in places that are easy for response personnel to reach, while at other times they occur in remote spots where it is difficult to bring in equipment. Some spills are very small and easily controlled, while others are very large and difficult to manage.

Spill scenarios address the different combinations of factors, including weather conditions, geographic isolation, and spill size, that can affect the ability of response personnel to contain and clean up an oil spill. Private companies and local, state, and federal agencies design their contingency plans to reflect several different scenarios. In order to develop these scenarios, the following information may be collected:

a. Types of oils frequently stored in or transported through that area.

b. Locations in which oil is stored in large quantities or through which traffic of oil tankers is high.

c. Proximity to sensitive habitats and human populations.

d. Extreme weather conditions that might occur in the area during different times of the year.

Contingency plans are designed to help response personnel to be prepared for the kind of spill that is Amost likely≅ for a particular place. On rare occasions, however, a spill occurs in severe weather conditions, or is much larger or more difficult to get to, than those that are most likely. To prepare for these unusual but severe incidents, contingency plans also include Aworst-case≅ scenarios. A worst-case scenario, for example, might assume that a large quantity of very dense, heavy oil has spilled at night during a storm, close to extremely sensitive habitats and vacation home along shoreline. By being prepared for the worst-case scenario, response personnel also will be prepared for less severe incidents.

3. Response Actions

A carefully designed contingency plan will describe major actions that need to be undertaken when a spill occurs. These actions should take place immediately following a spill so as to minimize hazards to human health and the environment. Response actions described in the contingency plan should include:

a. Notifying all private companies or government agencies that are responsible for the cleanup effort;

b. Getting trained personnel to the site quickly;

c. Defining the size, position, and content of the spill, its direction and speed of movement, and its likelihood of hitting sensitive habitats;

d. Assuring the safety of all response personnel;

e. Stopping the flow of oil, if possible;

f. Containing the spill to a limited area;

g. Removing the oil; and

h. Properly disposing of the oil once it has been removed from the water or land.

IV. Prevention

A. Spill Control

1. A dike or pit is to be used for spill prevention and control.

2. Dikes or pits must be constructed and maintained to prevent escape of brine and/or oil and other Hazardous Materials. These must have at least equal capacity to the spill volume.

3. The dikes or pits must be kept reasonably free of brine or other wastes.

4. The dikes or pits may not be used for ultimate disposal of brine.

B. Identification

1. Legible identification at or near well head or tank must include current information, such as:

   a. Owner
   b. Lease Name
   c. Well Number
   d. County
   e. Emergency Telephone Number (24 Hour)

2. If multiple wells are produced into common tank(s), each wellhead must be identified.

V. Guidelines for Handling Hydrocarbon Spills

A. Safety must be our first priority for personnel and civilians near the spill, with environment concerns secondary. Nothing in this procedure must preclude the Incident Commander from taking the necessary steps to provide safety for personnel on the scene of the spill. These actions include and are not limited to Foam Application, Complete Isolation of the Spill and/or evaporation of the spill.

Simple Hydrocarbons can be classified as Gasoline, Diesel Fuel, Heating Oil or Crude Oil. Most of these Simple Hydrocarbons are found in large quantities in our area. Any other spilled material or spills of unknown product should be isolated to protect Civilians as well as firefighters from exposures. Proper resources are available to handle such incidents such as Trumbull County Hazardous Material Response Team.

At all times when handling any combustible or flammable liquid use caution to prevent the product from coming into contact with the vapor area or any ignition sources. During any operations LEL shall be measured to ensure safety. The LEL should never exceed 10% in any work area. Ignition sources include pilot lights, engines, extrication from entrapment operations or static electricity. AFFF Foam should be applied when the possibility that an ignition can occur. Full gear should be worn at all times to limit direct exposure to skin and the respiratory system. All operations must be under taken by personnel properly trained to level that they are operating at the spill. (Awareness, i.e. Police Officers) (Operational, i.e. Firefighters) (Technician, i.e. Haz-Mat Team) and (Specialist, i.e. Command Haz-Mat Personnel) (Remember operationally trained personnel, such as firefighters may dike, dam, and absorb as long as personnel do not work directly in the product.)

B. Decontamination should be considered before returning to service for any fire gear contaminated from any hydrocarbon spill. Please note that if any spill reaches a waterway it must be reported to EPA immediately. In all cases, always report if in doubt.

1. Small Spills (Under 25 Gallons)

    a. Attempt to collect any puddles or pooling of product and absorb it with sand, dirt, Oil Dry or any other absorbent.

    b. At all times product should be kept from any sewer or waterway by first diking, damming, or collecting.

    c. Surface spills to pavement with no pooling should be covered with dry sand or Oil Dry material and isolated to evaporate.

    d. Disposal of the absorbed material is the responsibility of the spiller.

2. Large Spills (25 Gallons or more)

    a. Stop product from entering sewers or waterways by diking, damming, or collecting if possible. All actions should be defensive working ahead of the spill while limiting exposure to skin and turn out gear. If product is flowing and it can be stopped safely.

    b. Consider additional resources such as Booms, Pads, and additional personnel from other departments or commercial HAZMAT clean-up firms. Large spills might require the Trumbull County Hazardous Material Response Team deployment. Coordinate if possible with the spiller representatives on any extended operations.

    c. Clean up of large spills is handled in the same manner as small spills but by a licensed clean up contractor. Contact the Facility Coordinator as soon as possible or a designated spiller representative to request that a clean up contractor be the hired as soon as possible so that fire units may be released.

    d. Remember the spiller is required to pay for the response and it is important that proper information be gathered to allow for billing. Documentation is important and considers using police to assist.

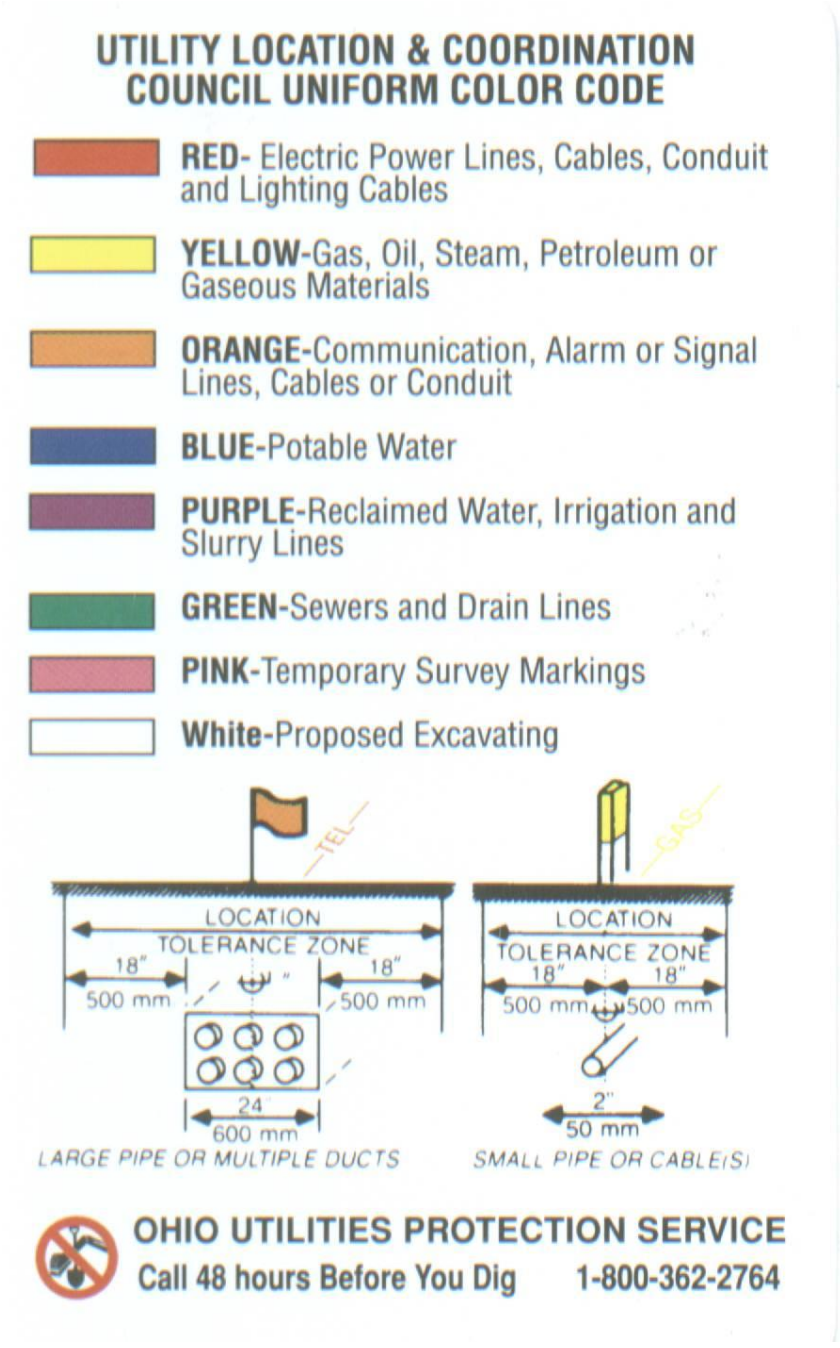
    e. The following contacts should be made as soon as time permits when the spill or release is over twenty five gallons.

V. ADDENDUMS

Tab 1 Utility Location & Coordination Council Uniform Color Code

Tab 2 Guidelines for Uniform Temporary Marking of Underground Facilities

UTILITY LOCATION & COORDINATION COUNCIL UNIFORM COLOR CODE



GUIDELINES FOR UNIFORM TEMPORARY MARKING OF UNDERGROUND FACILITIES

This marking guide provides for universal use and understanding of the temporary marking of subsurface facilities to prevent accidental damage or service interruption by contractors, utility companies or any others working on or near those underground facilities.

Use of markings
Use color-coded surface marks (paint or similar coating) to indicate the location and route of buried lines. To increase visibility, color-coded vertical markers (temporary stakes or flags) should supplement surface marks. All marks and markers should indicate the name, initials, or logo of the company that owns or operates the line and the width of the facility if it is greater than 50mm (2”). If the surface over the buried line is to be removed, supplemental offset markings may be used. Offset markings should be on a uniform alignment and must clearly indicate that the actual facility is a specific distance away.

Location tolerance zone
Any excavation within the tolerance zone should be performed with hand tools until the marked facility is exposed. The width of the tolerance zone may be specified in law or code. If not, 500mm (18”) is required form each side of the facility. The tolerance zone includes the width of the facility and 500mm (18”) measured horizontally from each side of the facility.

Proposed excavation
Use white marks to show the location or boundary of proposed excavation. Surface marks on roadways should not exceed 40 mm by 500 mm (1 ½” x 18”). The facility color may be added to white flags or stakes.

One-call systems
One-all damage prevention systems should be contacted prior to excavating to prevent damage to buried facilities.

Adopt uniform color code
The American Public Works Association encourages public agencies, utilities, contractors, other associations, manufacturers and all others involved in excavation to adopt the ULCC Uniform Color Code using ANSI standard Z53.1 Safety colors