



## E & B OILFIELD SERVICES INC. CONTRACTOR MITIGATION PLAN

CONTRACTOR DETAILS					
CONTRACTOR	E & B Oilfield Services Inc.				
PROJECT:	Pipe Line Maintenance, Demolition, Reclamation, Chemical Service, Roustabout, Consulting, Construction, Labor				
DATE:	Revised 4/19/2016				
MITIGATION PLAN					
Action #	Description of Issue	Action	Responsible	Date	Status
1	Formalized HAZARD IDENTIFICATION AND ASSESSMENT Plan Process Safety	<p>E&amp;B will be implementing a formalized Hazard Identification and Assessment Plan on April 1, 2015. It is intended that (HAZ-ID) will be a standardized yet thorough evaluation of the different work that E&amp;B performs. The program will augment, not replace our JSA / Tailgate Safety Meetings.</p> <p>Supervisors, with the input of employees, will conduct a Hazard Identification and Assessment (HAZ-ID) on each job task, piece of equipment or work environment. The HAZ-ID will be updated when the job task, piece of equipment or work environment changes. No E&amp;B Employee may conduct work without a relevant HAZ-ID available at the work site. No HAZ-ID will be valid for more than 13 months from the day it was issued (one year with a 30 grace period).</p> <p>The HAZ-ID will be referenced when conducting JSA / Tailgate Safety Meetings.</p>	President	Implemented on 5/1/15	100% Complete  Yearly revision date of 4/16.  Binders will be updated as new work is started.
1 - continued	Formalized HAZARD IDENTIFICATION AND ASSESSMENT Plan - Training and Process Safety	<p>All E&amp;B employees will be trained in the HAZ-ID process. This training will explain <b>how</b>:</p> <ul style="list-style-type: none"> <li>• HAZ-ID's are completed</li> <li>• HAZ-ID's will help employees be safer and avoid accidents</li> <li>• Employees can provide input during the process</li> <li>• HAZ-ID's are reviewed and approved</li> <li>• The information in a HAZ-ID will assist in the JSA's and Tailgate's</li> </ul> <p>The employees will be trained in person. During the training process, the importance of working safe will be repeatedly stressed.</p>	President	Implemented on 3/1/15	100% Complete
1 - continued	Formalized HAZARD IDENTIFICATION AND ASSESSMENT Plan - Assessments	<p>Branch managers will identify each different job task, piece of equipment or work environment that will need assessments. Supervisors will then complete each assessment with employee input. Branch managers will review each assessment then forward it to the President for review and approval.</p>	President	Implemented on 3/1/15	100% Complete  Will be updated for new work
1 - updated	1 Year Review of HAZARD IDENTIFICATION AND ASSESSMENT	<p>A job task inventory of current work revealed that no new work is being performed since the plan was put in place in March 15.</p>	Branch Managers	Initiated on 3/28/16	100% Complete

		<p>Employees were asked to continually watch for new hazards and report them to supervisors.</p> <p>The cover sheet has been replaced in vehicle HAZARD IDENTIFICATION AND ASSESSMENT books.</p>			
2	<b>Enhanced Training Program Process Safety</b>	<p>E&amp;B formalized our new employee training program in an effort to eliminate employee injuries.</p> <p>The training is conducted on the actual field equipment that the new employee will be using.</p> <p><b>Step One</b> - The trainer explains the basic principles and desired outcomes of the work that will be performed.</p> <p><b>Step Two</b> - The trainer explains each job step to the employee.</p> <p><b>Step Three</b> - The trainer demonstrates and explains each job step, while the employee observes.</p> <p><b>Step Four</b> - With direct control, the trainer explains while the employee performs each step.</p> <p><b>Step Five</b> - With the supervisor in direct control, the employee demonstrated and explains each step.</p> <p><b>Step Six</b> - Once the employee has mastered all the job steps, the supervisor conducts a safety / performance audit of each step.</p> <p>For seasoned oil and gas employees, steps one through six may only take a week or two. For employees with little or no oil and gas experience, the training may take much longer. In either case, the training process will not be rushed.</p> <p><b>Step Seven</b> - After the employee has passed the safety / performance audit, the employee, trainer and supervisor sign the training certification.</p> <p><b>Step Eight</b> - The trainer and supervisor periodically review the employees work in person to determine if proper procedures are being followed.</p> <p><b>Step Nine</b> - Same training method is used for procedure revisions and remedial training.</p>	President	Initiated on 5/6/13	100% Complete with current work and employees
2 - continued	<b>Enhanced Training Program - Continuing Training and Process Safety</b>	<p>OSHA or other regulatory instructors, representatives from our customers (like Caliber Foreman or Supervisors), oil and gas retirees, commercial instructors or community leaders are invited to present topics at our monthly safety meetings.</p> <p>These guests are asked to present a specific safety topics or they may present the topic of their choosing that is in the area of their expertise.</p>	Branch Managers	Implemented on 3/10/15	100% Complete with current work and employees

		These topics will address the safety concerns of our customers, our employees, the general public or the environment.			
3	<b>Near Miss Reporting Incentive program Process Safety</b>	<p>On September 10, 2014 E&amp;B initiated a Near Miss Reporting Incentive program.</p> <p>Employees have been asked to fill out a simple form to collect data about near misses. Employees turn these forms into their supervisors</p> <p>Supervisors discuss near miss scenarios with all employees at the daily JSA / Tailgate safety meetings.</p> <p>The reports are forwarded to the branch Managers, who will also discuss them at monthly safety meetings.</p> <p>The president selects the report that is most beneficial in preventing accidents or the report that has the most thought put into its creation. The author is given a \$50 gift card or similar type of gift.</p> <p>Discussing real life, near miss scenarios with employees will help them understand how injuries occur, and how to take corrective action to prevent similar – or more serious – incidents from happening in the future.</p> <p>If the president determines that discussion of the near miss is not sufficient, a supervisor will be directed to develop a practical training or demonstration using some or all the steps explained in topic “2 - Enhanced Training Program” on this document.</p>	President	Initiated on 9/10/14	Ongoing - each month a new near miss is selected
4	<b>Continues Safety Monitoring Program Process Safety</b>	<p>E&amp;B has a communication and safety check program in place to monitor the safety of our employees throughout the work day.</p> <p>Employees meet with a supervisor at the beginning of each day at the tailgate safety meeting. Supervisors keep in contact with employees throughout the work day. Communication is done in person, via cell phone or two-way radio.</p> <p>Employees are required call the supervisor to advise them they are leaving the field at the end of the day.</p> <p>GPS tracking devices are installed into all E&amp;B vehicles. These devices have constant power and cannot be disabled.</p> <p>If contact cannot be made with an employee at any time throughout the day or if an employee fails to make contact at the end of the day, the supervisor can use the gps data to find the employee’s vehicle and send someone to check on him.</p> <p>In an emergency situation, the gps data can also be used to get help to an employee before a situation becomes more serious.</p>	Branch Manager	Initiated on 4/19/13	Ongoing - Daily

		<b>No E&amp;B employee may preform work without a plan between the employee and the supervisor to communicate is in place and noted on the JSA.</b>			
5	<b>Hazard Awareness - Struck By Process Safety</b>	<p>In the future, all employees will be taken to a pig launcher for training about this specific incident. All employees will be shown how the E&amp;B accident occurred. They will be shown how to properly secure the pressure alert valve so that this accident never occurs again.</p> <p>This process will be demonstrated and explained to each employee and then, each employee will have to demonstrate they can perform this critical task through a functional, hands-on test.</p>	Pipeline Maintenance Supervisor	Initiated after an accident which occurred on 7/21/2012 near Roosevelt Utah	<p>100% Complete with current employees</p> <p>Ongoing for all new employees</p>
6	<b>Hazard Awareness - Struck By Personal Safety</b>	<p>All employees will be shown how this accident took place.</p> <p>All employees will be shown the equipment and how placing a hand in front of the paint sprayer nozzle, while the equipment is connected to pressurized air, can expose the employee to danger.</p> <p>All Employees will be shown photos of the injuries caused by similar equipment to impress upon them how serious this safety issue is and how much danger they could be in if they fail to follow basic safety procedures. They will discuss with supervisors the consequences of such injuries to them, their families and the ability to work in the future.</p>	Branch Manager	Initiated after an accident which occurred on 08/12/2014 near Roosevelt Utah	<p>100% Complete with current employees</p> <p>Ongoing for all new employees</p>
6 - continued	<b>Hazard Awareness - Struck By - Equipment Inspection Personal Safety</b>	<p>In the future, any employee who will be using this type of equipment, including new employees will be shown all the components of the equipment and their function. Employees will be shown how to inspect the equipment prior to use to be certain that all components are functioning correctly and that none of the safety features have been disabled.</p> <p>Employees will be shown the safety features, why they are important and how to use them properly and the correct body placement in relation to the equipment to ensure that there is no possibility of injury.</p> <p>Employees will be shown how to disconnect the equipment from pressurized air before attempting to clean or maintain any of its components.</p> <p>Employees will have to demonstrate in a functional test that they can safely use this type of equipment and prevent all possible injuries before they will be allowed to use it.</p>	Branch Manager	Initiated after an accident which occurred on 08/12/2014 near Roosevelt Utah	<p>100% Complete with current employees</p> <p>Ongoing for all new employees</p>
6 - continued	<b>Hazard Awareness - Struck By - Body Placement Process Safety</b>	All employees will be reminded periodically of their ability to stop work if this type of equipment or any of its safety equipment is not functioning properly. They will also be reminded that they must stop work if any work site situation or restricted access prevents them from using proper body positioning that could possibly lead to accident or injury.	Supervisors	Initiated after an accident which occurred on 08/12/2014 near Roosevelt Utah	100% Complete for Q3 2015
6 - continued	<b>Hazard Awareness - Struck By - Proper Gloves for Each Job</b>	Task appropriate safety gloves will be purchased by E&B and provided to anyone who uses this type of equipment.	Branch Manager	Indefinite	Current / Ongoing

6 - continued	Hazard Awareness - Struck By - <b>Employee Observation</b>	Supervisors will periodically observe each employees' work to be certain that they are performing all tasks as they were trained. They will also inspect equipment for proper maintenance and safety features.	Branch Manager	Indefinite	Current / Ongoing
7	<b>Heat related Injury Personal Safety</b>	<p>In the future all E&amp;B employees will receive heat related injury training each quarter, and new employees will receive heat related injury training as part of their initial training program.</p> <p>All employees will be shown photos of people who received heat related injuries and they will discuss the consequences of such injuries.</p> <p>Employees will be trained how to prevent heat related Injuries through planning for breaks, shade, air conditioned or heated vehicles, proper clothing and water consumption.</p> <p>Employees will be taught that cold medicine and other common drugs, caffeinated drinks, coffee and alcohol dehydrate the body and make people susceptible to heat related injuries. They will be instructed to carry water and non-carbonated / rehydrating drinks in all vehicles.</p> <p>Employees will be instructed to take frequent breaks to rehydrate and normalize their temperature even if they are not thirsty.</p> <p>Employees will be trained to recognize the symptoms of heat related injuries in themselves and their co-workers. They will be shown photos of the symptoms and be shown videos for learning to recognize the symptoms. They will be taught how headache, dizziness, fainting, absence of sweating, irritability, confusion, thirst, nausea, vomiting, passing out, collapse, numbness or seizures are all signs in heat related injury. They will be trained to get anyone showing signs of heat related injury into a vehicle or shade and administer water and rehydrating drinks.</p> <p>Employees will be taught that early and simple intervention will prevent very serious injury and death.</p>	President.	Initiated after an accident which occurred on 06/27/2013 near Roosevelt Utah	100% Complete for Q3 2015
7 - continued	<b>Heat related Injury - Water Personal Safety</b>	<p>All employees will be required to carry water in their work vehicles.</p> <p>Supervisors will provide bottled water or a 5 gallon insulated water jug in all E&amp;B vehicles.</p> <p>E&amp;B has purchased ice makers for the Nunn and Roosevelt Offices.</p> <p>Supervisors will ask employees at the beginning of each shift if they have water for the day.</p> <p>Supervisors will also ask employees how much water they have left throughout the day, to see if they are drinking enough water and to see they will have enough water to finish out the day.</p>	Branch Manager	Initiated after an accident which occurred on 06/27/2013 near Roosevelt Utah	100% Complete and current

7 - continued	Heat related Injury - <b>Reporting Process Safety</b>	Employees will be required to report every heat related incident no matter how minor to their supervisor.	Crew Supervisor	Indefinite	100% Complete and current
7 - continued	Heat related Injury - <b>JSA's Process Safety</b>	In the future, conditions that might lead to heat related injuries will be noted on <b>all</b> JSA's.	Crew Supervisor	JSA revised as part of HAZ-ID program	100% Complete and current
8	Reasonable Suspicion Drug Testing <b>Process Safety</b>	All E&B employees will be trained to recognize the signs of drug and alcohol abuse in their co-workers.  The training consists of a course and a test. The course is professionally developed and was purchased by E&B for every individual employee.  The training provides a certification allowing all employees to initiate a reasonable suspicion drug test.  Employees will still contact their supervisor to carry out the reasonable suspicion drug test.	Branch Manager	Completed over several weeks during Q3	100% Complete with current employees  Ongoing for all new employees
9	<b>Hazard Awareness - Struck By Personal Safety</b>	All employees will be shown how this accident took place.  Employees will be instructed that climbing on the side of the pickup by stepping on the tire and swinging a leg over the bed rail is not an approved safe method for entering the bed of a pickup.  Employees will be trained that the safe way to enter the bed of a pickup is by lowering the tailgate and entering the bed from a position of sure footing.  Employees are allowed to reach over the side of the bed if they can do so from the ground. If they cannot reach from the ground, they are to safely enter the bed from the tailgate.  Employees will also be trained that once in the bed of a truck to keep their body position low and not extend over the side of the bed.	Branch Manager	Initiated after an accident which occurred on 09/25/2015 near Greeley, CO	Will be completed by 10/15/15
9 - continued	<b>Hazard Awareness - Struck By Process Safety</b>	In the future E&B will not carry loads in the back of pickups that don't fit below the sides of the bed or that requires load-bearing strapping to secure. Straps to secure tarps or non-load-bearing items will be allowed.  Any load that cannot fit inside the bed of a pickup or requires load-bearing straps will be placed on a flatbed trailer or flatbed truck.	Crew Supervisor	Ongoing after 9/28/2015	Completed on 9/28/15
9 - continued	<b>Hazard Awareness - Struck By Process Safety</b>	In the future E&B Employees will not struggle with straps that have malfunctioned or failed to release properly.  Employees will be shown how to properly place a strap by keeping the strap from twisting or bunching excess strap inside the locking mechanism. Using the strap properly will reduce the possibility of a malfunction.	Crew Supervisor	Ongoing after 9/28/2015	Will be completed by 10/15/15

		<p>Employees will be trained that in the event of a malfunction the first attempt to free the strap is to use a spray lubricant such as WD-40, then activating the unlocking mechanism as usual.</p> <p>If the lubricant does not resolve the issue. Employees will cut the strap rather than struggle and risk injury.</p>			
9 - continued	<b>Hazard Awareness - Struck By Process Safety</b>	<p>Employees will be trained how to safely cut a strap free by following these simple steps:</p> <p><b>Step One</b> - Secure the scene by having other employees step back a safe distance, from the truck</p> <p><b>Step Two</b> - Place an additional strap over the strap that malfunctioned.</p> <p><b>Step Three</b> - If the tension was relieved from the malfunctioning strap when the second strap was added, release or unhook the malfunctioning strap.</p> <p><b>Step Four</b> - If the tension was not relieved from the malfunctioning strap, while wearing gloves, use a seat belt cutter to cut the malfunctioning strap.</p> <p>The second strap will prevent the malfunctioning strap from snapping up when the tension is released. It will also keep the load secured until it can be unstrapped in a controlled manner.</p>	Crew Supervisor	Ongoing after 9/28/2015	Will be completed by 10/15/15
9 - continued	<b>Hazard Awareness - Struck By Process Safety</b>	<p>E&amp;B will purchase extra straps and keep vehicles equipped with spares.</p> <p>E&amp;B will purchase seatbelt cutters and equip each vehicle.</p>	Crew Supervisor	Ongoing after 9/28/2015	Will be completed by 10/15/15
10	<b>Monday Morning Tailgate "Soft Start Meeting"</b>	<p>Each branch will conduct a Monday Morning Tailgate / "Soft Start Meeting".</p> <p>The purpose will be to reconnect / refocus after the weekend and discuss the upcoming weeks work.</p> <p>A safety topic will be covered by managers and employees and a roster will be signed.</p>	Branch Manager	Initiated on 9/29/15	Ongoing each Monday
11	<b>Hazmat Transportation Driver Training</b>	<p>All employees have some potential exposure to hazardous materials during transport. In some cases, the hazardous material is being transported by others.</p> <p>All employees will be trained in a course purchased from J.J. Keller, titled "Hazmat Transportation: Driver Training"</p>	Branch Manager	Implemented on 12/8/15	Current / Ongoing