



INCIDENT REPORTING



Purpose

The purpose of this program is to have effective procedures for reporting incidents.

Responsibilities

Individual responsibilities for reporting incidents are pre-determined and assigned prior to incidents.

Veracity Field Services Safety Manager

- Ensures incidents are documented and reported as required by this procedure and regulation.

Site Manager and Supervisors

- Ensures incidents are reported as required by this procedure.

Employees

- Immediately report any actual or suspected injury, job related illness, spill, or damage to any property to their immediate supervisor. If their immediate supervisor is not available, the employee is then to immediately notify the project manager.
- Incident Reporting
- Veracity Field Services investigates accidents and near-misses to prevent recurrence and ensure employee safety. Accidents are undesired events that result in harm to people, damage to property, loss to process and/or the environment and/or damage to the reputation of the company. Near-misses are defined as, undesired events which, under slightly different circumstances, could have resulted in harm to people, damage to property, loss to process and/or the environment or damage to the reputation of the company. Both accidents and near misses are collectively referred to as Incidents.
- Employees and contractors are to report all Incidents, unsafe acts and unsafe conditions to their supervisor as soon as possible and in accordance with the Reporting Guidelines set forth below. Reported Incidents may receive varying levels of investigation based on the severity of risk potential of the Incident.
- Reporting Guidelines
- Incidents Reporting Procedures
- In the event of an incident that requires immediate emergency response, contact 911 or the appropriate emergency services listed in the Emergency Action Plan (EAP) for the County the injured person is located. The EAP is located at www.veracityfieldservices.com.
- All incidents shall be reported, documented and investigated for causal factors, and the results must be reported to Veracity Field Services utilizing the incident notification form located in the Veracity Field Services Solution Center at www.veracityfieldservices.com. The incident notification form will also be utilized as a means for tracking changing conditions or diagnosis surrounding incidents. It is the responsibility of the Veracity Field Services supervising representative and the safety advisor to cooperate in the action of gathering and reporting incident related information.
- Spill and Hazardous Substance Reporting



- In the case of spilled Oil, petroleum product, and used oil, the Railroad Commission shall be notified when 210 gallons (5Bbls) or more is spilled outside of containment- click [here](#) for specific spill reporting requirements.
- Spills of hazardous substance shall be reported through the Veracity Field Services Solution Center. It is required that spills in excess of specified amounts ([click here for Reportable Quantities](#) or view chart below) be reported to the appropriate Railroad Commission District Office (see a map of the district boundaries [here](#)) by telephone. Such notice shall be followed by a letter submitted to the district office giving the full description of the event including, but not limited to, the volume of crude oil, gas, geothermal resources, other well liquids, or associated products that are lost. Click [here](#) to view oil and gas district office contact information.

Spill Reportable Quantities			
Product	Location	Reportable Quantity	Resource
Hazardous substance	onto land	"Final RQ" in Table 302.4 in 40 CFR 302.4 (PDF) Exit the TCEQ	30 TAC 327 Exit the TCEQ
	into water	"Final RQ" or 100 lbs, whichever is less	
Any oil	coastal waters	as required by the Texas General Land Office	Texas General Land Office Exit the TCEQ
Crude oil, oil that is neither a petroleum product nor used oil	onto land	210 gallons (five barrels)	30 TAC 327 Exit the TCEQ
	directly into water	enough to create a sheen	
Petroleum product, used oil	onto land, from an exempt PST facility	210 gallons (five barrels)	30 TAC 327 Exit the TCEQ
	onto land, or onto land from a non-exempt PST facility	25 gallons	
	directly into water	enough to create a sheen	
Associated with the exploration, development and production of oil, gas, or geothermal resources	under the jurisdiction of the Railroad Commission of Texas	as required by the Railroad Commission of Texas	Railroad Commission of Texas Exit the TCEQ
Industrial solid waste or other substances	into water	100 lbs	30 TAC 327 Exit the TCEQ
From petroleum storage tanks, underground or aboveground	into water	enough to create a sheen on water	30 TAC 334.75-81 Exit the TCEQ
From petroleum storage tanks, underground or aboveground	onto land	25 gallons or equal to the RQ under 40 CFR 302 Exit the TCEQ	30 TAC 327 Exit the TCEQ
Other substances that may be useful or valuable and are not ordinarily considered to be waste, but will cause pollution if discharged into water in the state	into water	100 lbs	30 TAC

Procedure

Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.



VERACITY FIELD
SERVICES, LLC
INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	See Table 2	ASAP	Yes
In-patient Hospitalization Amputation Loss of an Eye	CEO, Safety Manager, OSHA	Within 24 hours to OSHA	Yes
Fatality	CEO, Safety Manager, OSHA	Within 8 hours to OSHA	Yes
Workman's Comp	Workman's Comp Carrier	1 business day	Employer's Report of Injury

Table 1

OSHA defines "in-patient hospitalization" as a formal admission to the in-patient service of a hospital or clinic for care or treatment. Treatment in an emergency room only is not reportable.

OSHA defines "amputation" as the traumatic loss of all or part of a limb or other external body part. This would include fingertip amputations with or without bone loss; medical amputations resulting from irreparable damage; and amputations of body parts that have since been reattached. If and when there is a health care professional's diagnosis available, Veracity Field Services should rely on that diagnosis.

Main Guidelines of OSHA Reporting

OSHA is notified within 8 hours of a work-related fatality. Within eight (8) hours after the death of any employee as a result of a work-related incident, Veracity Field Services must report the fatality to the Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.

Within twenty-four (24) hours, Veracity Field Services must report in-patient hospitalization, amputation, or loss of an eye (severe injuries) to OSHA.

How injuries and/or fatalities are reported to OSHA - Veracity Field Services must report severe injuries and/or fatalities using one of the following methods:

- by telephone or in person to the OSHA Area Office that is nearest to the site of the incident,
- by telephone to the OSHA toll-free central telephone number, 1-800-321-OSHA (1-800-321-6742),
- or by electronic submission using the reporting application located on OSHA's public web site at www.osha.gov.



Internal Reporting Guidelines

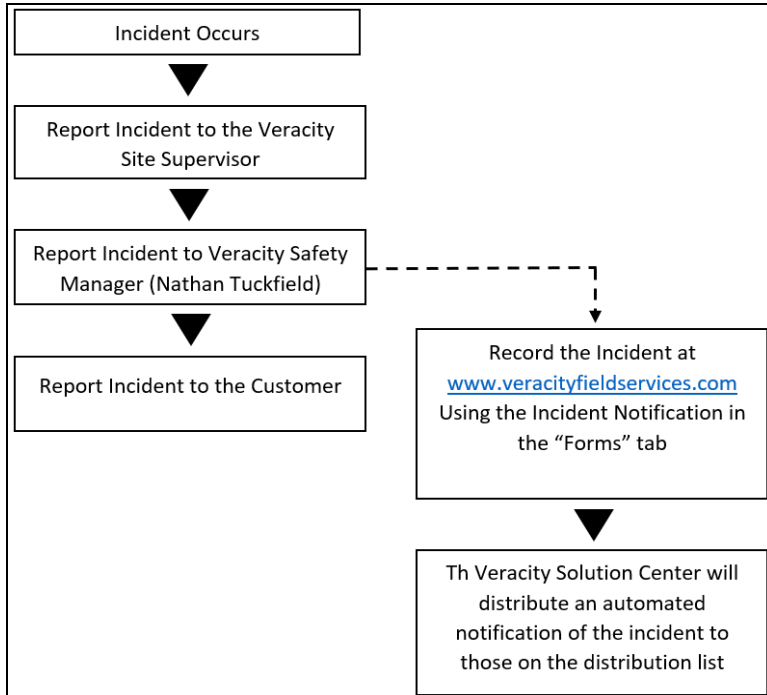


Table 2

Initial Identification/Assessment of Evidence

Initial identification of evidence immediately following the incident could include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

Collection/Preservation and Security of Evidence

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. Everything shall be dated.

Witness Interviews and Statements

Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed. All items shall be dated.



The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Written Incident Report

The Veracity Incident Notification form must be completed for every Near Miss and Incident that occurs in company operations. Spills must be documented in the Spill Notification Form- each can be located at: <https://veracityfieldservices.com/forms>

The supervisor takes the below steps following an injury incident.

- Provide emergency assistance, as needed, and qualified for
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident
- Notify management by phone per the Incident Notification Matrix
- Identify potential witnesses
- Use investigation tools, as needed (camera, drawings, video, etc.)
- Tag out for evidence any equipment that was involved
- Interview witnesses (including the effected employee) and obtain written, signed statements and email/fax to the Veracity Field Services Safety Manager
- Implement any immediate corrective actions needed

Training

Veracity Field Services shall train personnel in their responsibilities for incident reporting. Training requirements relative to incident reporting are described below:

- Training frequency will be based on the specific area of responsibility but shall not exceed once every two years.
- Training requirements relative to incident investigation and reporting shall include:
 - Awareness
 - First Responder Responsibilities
 - The Initial Investigation at the Accident Scene
 - Managing the Accident Investigation
 - Collecting Data
 - Analyzing Data
 - Developing Conclusions and Judgments of Need
 - Reporting the Results