

**Hawk Energy, LLC.**  
**SECURITY PLAN FOR THE TRANSPORTATION**  
**OF HAZARDOUS MATERIALS**

**Utah Physical Address:**  
**2085 W. HWY 40**  
**Roosevelt, UT 84066**

**Colorado Physical Address:**  
**200 North Lincoln**  
**Nunn, CO 80648**

**Updated: December 12, 2024**

**Statement of Purpose:**

Hawk Energy, LLC is committed to the safety and security of our employees, our customers, and the general public. Since the September 11, 2001 terrorist attacks, it has been necessary for everyone, including Hawk Energy and our employees, to be more vigilant in preventing or inhibiting the use of our products, transportation equipment, and facilities by international and domestic terrorists and by those who might collude with such terrorists. All of Hawk Energy's employees are asked to help implement this security plan and improve continuously Hawk Energy's security efforts.

The U.S. Department of Transportation's Research and Special Programs Administration has promulgated regulations (known as "HM-232") that, in part, require that any employee of this company (including independent contractors) who is a "hazmat employee" be trained and be familiar with E&B's security plan. Our understanding of these regulations is that a "hazmat employee" is any person who performs a task or function covered by the Federal Hazardous Materials Regulations ("HMRs").

**Security Risk Assessment**

Hawk Energy has collected, reviewed and integrated information about potential security risks as part of its attempt to understand site-specific and route-sensitive risks to security. The following items will be updated periodically:

- Safety personnel will have their email address registered with the National Terrorism Advisory System in order to receive timely alerts.
- Managers will maintain relationships and contact with local law enforcement
- Managers will report all theft and suspicious activity to local law enforcement
- Managers will monitor local news media for emerging trends related to security.

- Current threats will be discussed with employees at safety meetings.

The current threat assessment for Hawk Energy's facilities and in route deliveries is currently:

- Grand theft (\$500 or more) and Petty Theft (\$499 or less) from facilities for financial gain is **HIGH** for all locations.
- Terrorist activity is **ELEVATED** with not specific threats identified for all locations.
- Chemicals such as Xysol, Glycol, and bleach could be used to cause physical or environmental harm. Chemicals are to be secured to the greatest extent possible. This threat is assessed at **LOW** for all locations.

## Personnel Security

Hawk Energy will implement the following provisions with regard to the employment (including applications for employment) of hazmat drivers. Further, Hawk Energy, at its discretion, may implement some or all of these provisions relevant to the employment of non-driver employees who perform functions regulated by the Federal HMRs.

1. Perform detailed background checks on all applicants for any driver position.
2. To the extent possible, check for criminal convictions.
3. To the extent possible, contact previous employers and references.
4. To the extent possible, investigate gaps in employment.
5. To the extent possible, have at least 10 years consecutive employment/education records.
6. Maintain employee information in a confidential and secure manner, and in compliance with all relevant Federal and State regulations and statutes regarding confidentiality and individual privacy.
7. Verify that drivers are U.S. citizens or that non-citizens have documentation appropriate to their immigration status.
8. Ensure drivers have current CDL with appropriate endorsements and current medical certificate.
9. Collect any company security materials when a driver/employee leaves Hawk Energy.
10. Update company websites and lists, as well as cancel passwords to prohibit computer access by former employees.

## Unauthorized Access

1. The Branch Manager will be in charge of security for Hawk Energy at each facility.
2. Hawk Energy, will conduct security awareness training for all employees, including how to report suspicious incidents or events.
3. Hawk Energy will require all visitors and outside vendors to a company facility (beyond the front office) to sign in and out. Visitors will park vehicles in designated parking areas.
4. Supervisors will perform daily checks and equipment reconciliations.

5. All personnel will remove keys from trucks and truck tractors not in use and have key locked inside the office during non-business hours.
6. All employees will control access to computers, especially those with product or routing information.
7. Hawk Energy may request periodic checks of facility areas by local law enforcement, especially when facility is not open.
8. Hawk Energy may develop specific actions for each security level alert that might be set by the Department of Homeland Security (“DHS”).
9. Hawk Energy will post the DHS alerts in drivers’ room and other public areas.
10. Hawk Energy will post and periodically review driver anti-terrorism tips.
11. All employees should be aware of possible points of unauthorized access to company facilities or buildings.
12. Hawk Energy will periodically test emergency response communications equipment and procedures.
13. Hawk Energy will periodically change combinations to gates and doors or after personnel changes.
14. Gates leading to vehicles at the Roosevelt location will be locked during non-work hours.

## **In Route Security**

1. **STAY ALERT!**
2. Drivers will lock truck or truck tractor doors at all times and take keys any time the driver is not with vehicle. Ensure windows are closed.
3. Drivers will perform “walk around” inspection of vehicles after every stop, including deliveries and breaks.
4. Hawk Energy “away parking instructions” for any locations away from company facilities:
  - Look for lighted parking
  - Look for fenced areas
  - Look for areas that are visible to local security, law enforcement or security cameras.
5. Hawk Energy will include security considerations in route selection and times for pick-up and delivery.
6. Driver “down-time” will be minimized while in route. Schedule as few stops as possible.
7. Hawk Energy employees will communicate emergency messages by cell or text to home facilities and to other drivers on the road. Hawk Energy employees will communicate unexpected occurrence with equipment, load, or route.
8. Drivers (and other knowledgeable employees) will not discuss any details about their load or pick-up points and destinations with unauthorized personnel, such as over the CB radio or at truck stops.
9. Drivers will not pick up hitchhikers or allow any unauthorized personnel in the truck cab.
10. Drivers will use discretion when stopping to help disabled vehicles or motorists. Call local authorities and notify them of anyone needing assistance. Be suspicious of motorists trying to get the driver to pull over for an “alleged” traffic accident. Be especially suspicious of vehicles with three or more people in them.
11. Hawk Energy will use travel plans and vehicle GPS data for detecting “late loads.” E&B will investigate any late load more than an hour late for a delivery.
12. Drivers will not change delivery destination unless authorized.

13. Hawk Energy employees will proceed to safe areas when being asked to pull over by law enforcement or unmarked vehicles.

14. All employees are to report any suspicious events to Hawk Energy and local law enforcement.
15. If there is an emergency situation, contact 911 immediately.
16. Drivers will not allow themselves to be distracted by others during the loading/unloading.
17. Employees will have the FMCSR pocketbook regarding attendance and surveillance of motor vehicles.
18. State and Indian tribe NRHM (non-RAM) routing designations can be found at:

**<https://www.federalregister.gov/articles/2000/12/04/00-30815/transportation-of-hazardous-materials-designated-preferred-and-restricted-routes#t-21>**

Drivers are to be familiar with routing restrictions and check the restrictions before new routes are planned.

19. Division 1.1, 1.2, 1.3 hazard materials drivers are to be given written route plans.

## **Reporting Threats and Security Breaches**

In the event of a Security Breach **in progress** take the following action:

- If the possibility of injury or death exists, move to a safe distance and contact 911, then contact your supervisor.
- If the breach is minor contact your supervisor. If the supervisor is not available, call 911.

If a **past** security breach has been discovered, limit access to the area to preserve evidence and contact your supervisor.

The following information would be helpful to note when reporting any threats or incidents:

- Description of the vehicle(s): Please describe all observables about the truck size, color, markings, as well as license, registration, and other pertinent identifying information.
- Description of the truck's contents: What is the truck carrying, and in what quantity?
- Description of the event or observation:
  - When did the event occur?
  - Where did the event occur?
  - What direction did the truck head?
  - Describe the individual(s) operating the vehicle?
  - Did the individual(s) involved in the event say anything about what they were doing or where they intended to go?
  - Additional suspects involved, i.e. supporting surveillance vehicle.

All security related issues are to be forwarded to Danny Abegglen for review.

## General Security Awareness

Hawk Energy employees will report:

- Any employee or visitor making unusual or repeated requests for sensitive or important company-related information.
- Any person asking a driver to make any unauthorized movement (pick-up and delivery) for cash.
- Any person or group loitering outside Hawk Energy facility.
- Any person claiming to be a representative of a utility (gas, water, electric) but cannot produce company identification.
- Any person carrying a weapon, such as a gun or knife.
- After hours, any vehicle driving by Hawk Energy facility with the lights off.
- Any occupied vehicle parked outside Hawk Energy facility – especially if the vehicle has been sitting for a long period or after normal work hours.
- Any unfamiliar vehicle that appears to be abandoned near Hawk Energy facility.

_____	President	December 12, 2024
Signature	Title	Date