

POLICY

Hawk Energy, LLC has adopted the following program to ensure that short-service employees are identified, appropriately supervised, trained, mentored and managed. This program is adopted to prevent accidents such as personal injury, injury to others, environmental damage and/or property damage by the short service employee.

Hawk Energy, LLC defines a short-service employee (SSE) as any person or employee with less than six (6) months of experience in his/her current position or with one's current employer. A person can also be classified as an SSE if they change jobs within the Company they are working for or as a new hire for the same type of position for another company.

Hawk Energy, LLC is responsible for ensuring that the following policy and safe work practices are enforced.

REFERENCES

Although OSHA has no specific requirements regulating short-service employees, Hawk Energy, LLC has adopted this policy for the general safety of its employees and will follow industry best practices.

RESPONSIBILITIES OF EMPLOYER

Hawk Energy, LLC is responsible for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions

Hawk Energy, LLC is responsible for informing a host facility (hiring client) if an SSE will be performing work at their facility or job site.

Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves.

RESPONSIBILITIES OF EMPLOYEE

Employees are responsible for wholehearted, genuine operation with all aspects of the Safety and Health Program including compliance with all rules and regulations – and for continuously practicing safety while performing their duties

HAZARDS

High Hazard Areas

SSEs may be prohibited from entering and working in high-hazard areas in certain situations, these may include:

- Naturally occurring radioactive material (NORM)
- H²S areas
- Confined spaces

PROCEDURES (SAFE PRACTICES)

Work Crew Assignments and Restrictions

- A single employee as his own crew is not considered an SSE
- Employees defined as SSE are not permitted to work alone
- When crew/group sizes of less than five (5) are assembled, no more than one (1) SSE per group/crew is allowed
- When working with crew/group sizes larger than five (5) members, the number SSEs will not exceed 20% of the crew/group makeup.
- If the crew/group exceeds the twenty percent (20%) makeup of SSEs, a written variance form is required, which will serve as a mitigation plan. This variance will be approved by the Supervisor and/or Manager in charge of the project

Communication and Notification

The processes for the proposed crew/group, when using an SSE, are outlined in the Short Service Employee Form. Before beginning the job assignment, the Supervisor/Manager in charge will submit the completed SSE form for all the jobs that will contain SSE personnel, to the project's coordinator, on-site supervisor, or contractor. The work owner or supervisor/person in charge will decide the SSE approval status and will keep the original completed form in the project files.

Identification

All SSE personnel will be easily identifiable from more seasoned employees using one of the following methods:

- Wearing a standardized color high-visibility hard hat
- Wearing a standardized color vest
- Any other method which identifies the employee as an SSE

Monitoring SSE's

The supervisor will monitor their employees, which includes the SSE personnel for their safety performance, compliance with company safety policies and procedures and Environmental, Health and Safety (EHS) awareness.

The identifier marking the SSE may be removed from the SSE Program at the discretion of the supervisor at the end of the required six-month period if the SSE has:

- Worked safely
- Adhered to all EHS policies
- Had no recordable incidents attributed to them

The supervisor will require the employee who fails to complete the six (6) months free of recordable incidents, to get the operator to approve in writing before allowing the person to return to the operator's property.

Mentoring Process

All SSE's will be assigned a mentor for the first six (6) months of employment. A mentor's responsibility is to develop the SSE personnel by providing guidance, instructions and supervision. A mentor may be assigned only one (1) SSE per crew/group and will never allow an assigned SSE to work alone by always being onsite to monitor the SSE.

The mentor will meet the following requirements:

- Knowledgeable and experienced, and have up-to-date orientation training
- Be familiar with the SSE's job, have the oversight responsibilities required and all hazards accompanied with the job
- Be familiar with all site policies, procedures and any required specialized actions with the work to be done
- Show the ability to recognize any hazards and/or unsafe acts
- Are able and willing to challenge their employees on the job if they do not meet site procedures, policies, or other requirements and will see that the stop-work authority is enforced
- Participate actively in the behavior-based safety process

Note: A mentor will keep a helpful eye on new hires in your crew. Take time to describe the layout of the project, the best method to access the work, or how to work a tool they have never used before.

Subcontractor Management

Subcontractors hired by the Company will adhere to applicable policies and procedures put in place regarding SSEs.

Subcontractors working on-site will have assigned mentors who monitor their employees only. Mentoring of outside employees will be done on an individual basis and as required. They will also be managed by this policy.

REQUIREMENTS

SSE Plan

Hawk Energy, LLC has established this Short-Service Employee (SSE) plan to verify all work is being carried out safely by requiring SSE supervisors to:

- Communicate the SSE policy and procedure at all pre-job meetings.
- Submit the crew/group makeup and all SSE form(s) to the on-site representative of the work owner for approval.
- Ensure the on-site representative validates the crew/group makeup and experience level.
- See that the on-site representative approves the SSE variance form.
- Make sure the on-site representative posts the forms to the appropriate database if required.

SSE Review

To ensure each Short-Service Employee is progressing satisfactorily through the SSE program, the Company will document progress of everyone from start to completion.

Based on the unique characteristics of the assigned work of the SSE, a checklist will be developed for each SSE employee with a record of milestone requirements met. These requirements, based on the unique assigned area, group, or work, such as:

- Receiving the required safety orientation
- Attending the required safety training
- The SSE demonstrates the ability to do the job required
- SSE can use tools/machines/equipment safely
- The ability to identify the hazards at the work site and how to protect oneself.

Additional key milestones will be added.

Program Review

This Short Service Employee Program will be reviewed on a regular basis to ensure the practices are kept up to date by performing the following:

- Continuous monitoring of the SSE
- Ensuring all changes/updates to the forms are submitted before beginning work and whenever a change may occur thereafter

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Short-Service Employees will be provided required PPE at the expense of the employer. SSE will receive training in:

- PPE that is required in various locations
- How to inspect, don, doff clean and maintain required PPE

TRAINING

Short-Service Employees will be properly trained in the knowledge and skills necessary to conduct their assigned jobs safely and efficiently.

Training will include:

- Federal, state, industry and company requirements
- Hazard(s) present in the workplace.
- The policies, procedures and processes utilized to control these hazards and prevent illnesses, injuries, property damage and/or environmental incidents.
- The proper use of PPE and all its requirements

Contractor Short-Service Employee Form & Variance

A supervisor will complete and submit this form to work owner supervision for approval prior to arrival on location. The work owner supervision will approve the individual SSE before he/she arrives on location.

I SSE Information					
Contractor Company Name:					
SSE Name:					
Request Date:		Date of Employment:		Current Job Title:	
Years Related Experience		Yrs.	Months	Experience in Current Position	
Is this worker in compliance with your Substance Abuse Policy?				<input type="checkbox"/> Yes	<input type="checkbox"/> No
Have site owner, contractor and HSE policies been reviewed with SSE?				<input type="checkbox"/> Yes	<input type="checkbox"/> No
Assigned Mentor's Name:			Mentor's Experience:	Yrs.	Months
List all training provided to the SSE:			List any previous special training:		
SSE(s) identified by: Hard Hat -High Visibility Vest -High Visibility			Other:	Color;	

II. SSE Crew Composition Requirements	
Choose one (1) of the crew types below. If any of the stated limitations are exceeded, proceed to the variance form on next page.	
Single person crew-cannot be an SSE (Variance Required)	
2-4-person crew-no more than one (1) SSE	
5 or more-person crew-no more than 20% SSE(s) per crew	
Exceeding 20% SSE per crew (Variance Required)	
III. SSE Review and Approval	
Contractor Supervising Manager:	Date:
CPL Work Location Supervisor:	Date:
Work Owner:	Date:
IV. Contractor SSE Form Repository	
CSM Data Base:	Date:
CPL Work location	Date:
Work Owner file:	Date:

This form is to be filled out whenever the conditions on this form or any other element of the Short Service Employee Policy cannot be met.

IV. Variance Information	
Variance Justification (What are the current circumstances and what will be done to ensure an acceptable level of risk?)	
Alternatives to Variance (If the variance is denied, what are the alternatives to completing the scope of the work? Briefly detail the cost and operational impact of the alternatives.)	

List the steps to be taken to manage/mitigate the SSE risk to an acceptable level:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

V. Variance Review and Approvals

Variance Expiration Date: _____

Contractor Manager/Supervisor

Approves Denies

Signed: _____ Date: _____

Work Owner's on-site representative Approves Denies

Signed: _____ Date: _____

Note: For large jobs, please use a separate sheet to list all SSEs on the crew by name and job title.

Training Record

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:Signature:	

