



EMERGENCY RESPONSE PLAN

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NOTE:

The online version of this plan is the only controlled version of the plan. Reviews, revisions, and updates will be made to the online version on a regular basis. If this plan is printed, the printed version of the plan is only valid on the day of printing. The controlled, official version of the Pulsar Helium Emergency Response Plan is available at <https://safehe.com/>

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1 INTRODUCTION AND PLAN CONTENT

1.0 PURPOSE AND SCOPE

The purpose of this Emergency Response Plan (ERP) is to:

- Help facilitate and organize responses and actions during workplace emergencies.
- Develop and implement an Emergency Response Plan for the purpose of protecting public health and safety, the environment, and company reputation and social license to operate.

This Emergency Response Plan (ERP or Plan) facilitates a coordinated response by Pulsar Helium (PH or the Company) personnel and/or representatives (employees, contractors, and/or subcontractors) to emergency situations related to its exploration, production, and support services. It will describe the procedures which will be implemented, in whole or in part, if an emergency situation occurs during any phase of Pulsar Helium operations including, but not limited to, the following types of incidents:

- Serious injury or fatality
- Spill, hazardous materials release, or product release
- Major property or equipment damage
- Fire or explosion
- Security threat or suspicious activity
- Severe weather
- Catastrophic vehicle incident (work related)

The information contained in this ERP is intended to be used as guidelines for the emergency responder and members of the response team(s). Actual circumstances may vary and will dictate the procedures to be followed, some of which may not be included in this ERP.

This Plan is not meant to replace common sense or actions not specifically described herein. Representatives tasked with emergency response responsibilities should continually evaluate the effectiveness of actions called for in this Plan and make the appropriate adjustments based on past experience, input from other response team members and level of training to most effectively mitigate the incident.

1.1 PLAN REVIEW AND UPDATE PROCEDURES

This Plan will be reviewed and updated annually or more frequently if significant changes occur that may affect the Company's response capability.

Revisions or amendments will be entered in the Revision Record.

1.2 PLAN DISTRIBUTION PROCEDURES

The Director of Health, Safety, and Environmental (HSE) will coordinate the distribution of the Plan. Distribution will be handled in the following manner:

- Distribution of the Plan is controlled by the footnoted date.
- A current copy of the Plan shall be maintained at all offices and facilities as determined by the Director of HSE.
- An online copy of the plan is available to all local police departments, fire departments, and local emergency response teams that may be called upon to provide emergency services.
- An Emergency Response Guide will be kept by all potential Incident Commanders and other potential members of the response team(s).

1.3 REGULATORY COMPLIANCE

The development, maintenance, and utilization of this Plan implement company policy and follows the suggestions, standards, and industry practices for the below regulatory requirements and guidelines as applicable/appropriate to upstream Oil and Gas operations:

- Occupational Safety and Health Standards: 29 CFR 1910.38 - Emergency Response Plans.
- Title 40: Protection of Environment - §68.95 - Emergency Response Program.

1.4 OVERVIEW – INCIDENT MANAGEMENT

The goal of incident management is the restoration of normal operations while minimizing impacts on people, the environment, property and company reputation. To achieve this goal, Pulsar Helium emergency management personnel, at all levels, must be able to move from a reactive to a proactive mode of operations by establishing and maintaining command and control over the situation. For incident response operations, these are procedures that allow responders to rapidly and efficiently determine the problem(s) and communicate effectively about it as well as what is being done to address the emergency.

Emergencies are usually initially discovered by field representatives. These representatives will be the first responders and, in all likelihood the Incident Commander until a supervisor level person arrives on scene. The First Responder must:

- Take charge of the scene
- Protect life and public safety first, then consider the environment or company assets
- Make an attempt to identify the Emergency Level (1, 2, or 3) (See Section 1.6)
- Make initial notifications and advise of the Emergency Level
- Stabilize and/or begin to manage the emergency until additional resources arrive

If the Emergency Level is a 1, and in some cases a 2, the emergency should be able to be dealt with on scene and without needing outside support. The Incident Commander will start up the Field Response Team and delegate roles as needed (see Section 4.2).

Some Level 2 emergencies and all Level 3's will require the startup of the Emergency Management Team (EMT) and the staffing of the Emergency Operations Center(s) (EOC). The EMT is staffed by Pulsar Helium managers who will support the Incident Commander and his/her needs for dealing with the ongoing emergency situation. The Emergency Manager will also confirm the Emergency Level to ensure the correct response is being made.

During emergency response operations, the Field Response Team (Figure 2) is responsible for the tactical (actual hands-on) response. In support, Emergency Management Team personnel should address incident plan objectives by analyzing the information generated by Field Emergency Response personnel and determining the impact of the incident on the Company. The analysis should focus on public health and safety, environmental and community protection, external affairs, human resources, legal, business, and financial issues that are attendant to, but separate from those more properly addressed by emergency response personnel. This is the strategic side of the response (long term).

During the emergency response the following will be adhered to:

- **Check-In** - All responders, regardless of agency or affiliation, must report in to receive an assignment in accordance with the procedures established by the Incident Commander.
- **Incident Action Plan** - Response operations must be directed and coordinated as outlined in the IAP (developed and/or approved by the Incident Commander).
- **Unity of Command** - Each individual involved in incident operations will be assigned to only one supervisor.
- **Transfer of Command** - The Transfer of Command process will always include a briefing, which may be oral, written, or a combination of both.
- **Span of Control** - Supervisors must be able to adequately supervise and control their support team members, as well as communicate with and manage all resources under their supervision. A staff / supervisory ratio of 5:1 has been established as optimum, but not to exceed a 7:1 ratio unless all the workers are doing the same task.
- **Resource Tracking** - Supervisors must record and report resource status changes as they occur, including:
 - Resources Required
 - Resources Ordered
 - Estimated Time of Arrival (ETA)
 - Resources On-Scene
 - Resource Location / Assignment

Personnel at each level of the command structure will receive direction from and are required to provide regular status reports to their immediate supervisor. It is recommended that the Incident Status Update Form be used as a format (see Appendix B). A whiteboard or equivalent should also be used during response activities to provide a snapshot of current incident status to personnel.

All levels of risk require the appropriate risk transfer, reduction or elimination as well as appropriate actions and approvals within the Incident Command Team. In situations where the risk to personnel is extreme, activities will be limited to defensive and protective actions. Additional information on risk is covered in Section 4.4.

The factors to determine appropriate response actions are:

- Defining the problem,
- Clarifying any modifying conditions,
- Evaluating the risk to people, environment, financial and company reputation,
- Clarifying available resources for control measures,
- Defining critical issues,
- Prioritizing critical issues, and
- Implementing corrective or preventative strategies.

Summary – the Incident Commander is on or close to the scene at the Incident Command Post and is in charge of the tactical response. He/she will direct actions, request support, and manage the minute-by-minute response to the emergency. All other personnel are there to support and advise the Incident Commander.

The Emergency Manager will help ensure the Incident Commander is getting the staff, supplies, and support needed to manage the emergency and get it under control. He/she is also responsible for the strategic response - keeping track of the bigger picture and the longer-term scenarios that may be developing so they do not become emergencies in and of themselves (media response, financials, etc.)

NOTE: It is important to remember that during the initial emergency response, as resources are being determined and requested, it is better to over-respond than under respond. It is easier to stand equipment and personnel down than to get them moving. Waiting on equipment or people can make a situation worse in the long run, so get the pieces moving and scale down later if the situation dictates.

INCIDENT CLASSIFICATION

Emergency Level Assessment

An emergency is a situation that threatens the Company, workers, or the public; disrupts or shuts down operations; or causes physical or environmental damage. Emergencies may be natural or man-made and may include fire/explosions, chemical spills or releases, tornadoes, floods, wildfires, winter weather, disease outbreaks, and their results (injuries, impact on habitat, etc.). Upon the occurrence of an emergency, the Company will access the scene and make a determination of the emergency level and the resulting response.

Emergencies are defined in three distinct groups or levels that are universally recognized terms and familiar to most first responders:

Level 1: Incidents that are limited to the location where it occurred, is under effective and immediate control and has relatively minor impact on people, the environment, company assets, or company reputation.

Examples of Level 1 emergencies include:

- Injury requiring the evacuation of injured personnel.
- A reportable spill confined to the lease or pad.
- Equipment damage that compromises its safe operation.
- Threatening or severe weather.

Level 2: Incident control has not been achieved, imminent or near-term control is likely, and the incident has moderate impact on people, the environment, company assets, or company reputation.

Examples of Level 2 emergencies include:

- Serious injury resulting in hospital admittance.
- A reportable spill that extends beyond the lease or pad.
- A facility fire or hazardous materials release.
- Severe weather such as a tornado warning within Pulsar Helium area of operations.

Level 3: Incident control has been lost, imminent or near-term control cannot be established, and the incident has severe impact on people, environment, or company assets, or company reputation.

Examples of Level 3 emergencies include:

- Incidents resulting in multiple serious injuries or fatalities.
- Spill threatening a water supply.
- An emergency that causes public evacuations or major media attention.

2. NOTIFICATIONS

Notification of supervisors, HSE, and others to the awareness of an emergency is critically important to effective emergency management. Advising properly and in a timely manner will help the initial responder to manage the incident and work to de-escalate the situation.

The general initial emergency notification process is:

1. Notify your supervisor
2. If emergency services are needed call 911
3. Notify HSE (these first three steps may be altered depending on the emergency)
4. Stand up the Field Response Team *as required*
5. Initiate additional ERP response procedures *as required*

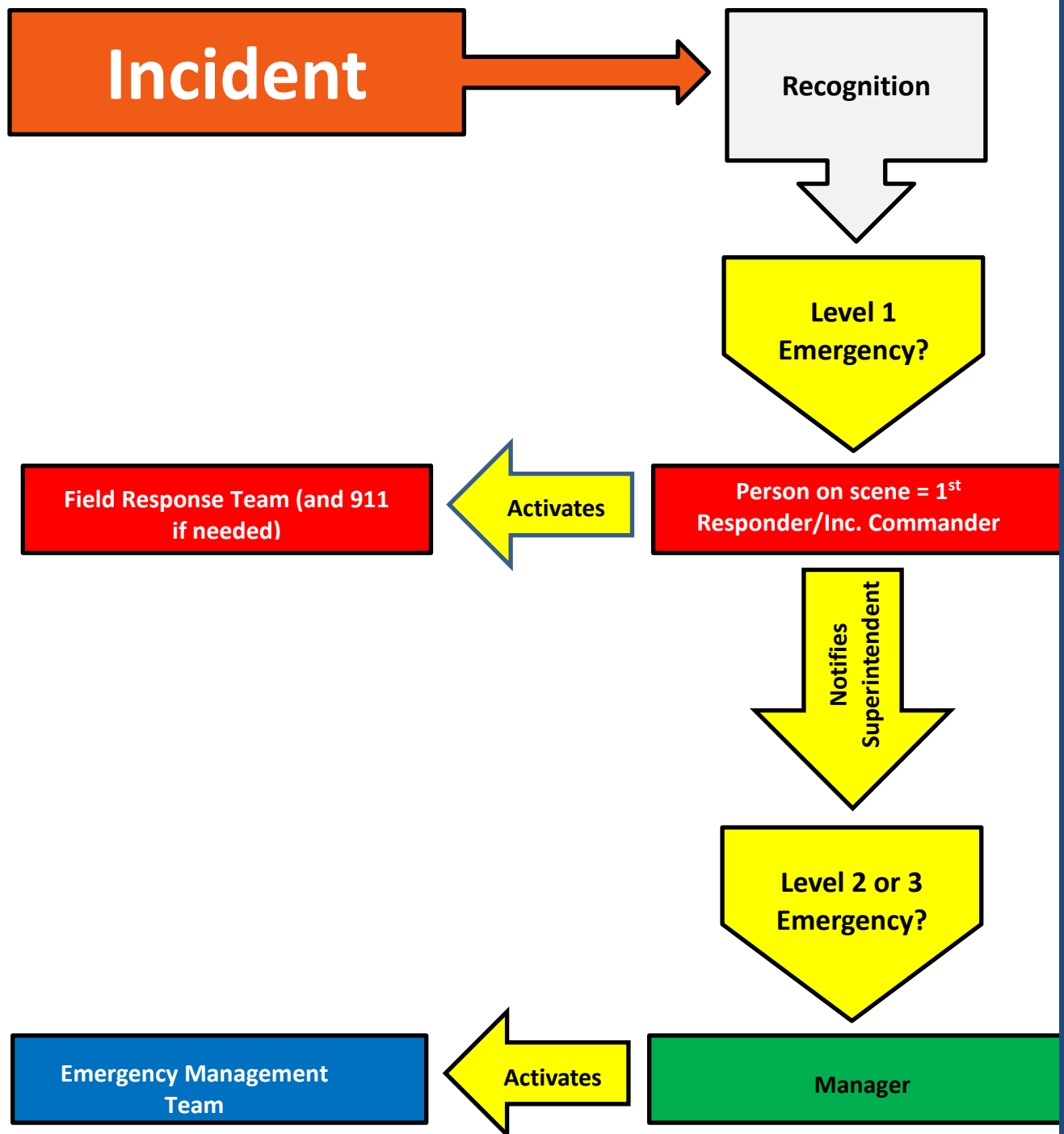
As the emergency situation unfolds other notifications will be made as required and discussed in additional sections of this manual.

Note: Site-specific Emergency Action Plans and Call Lists can be found in the Pulsar Helium HSE Center (<https://safehe.com/>).

IMPORTANT:

- If there is any doubt that the situation is an emergency, make immediate notifications and proceed as if it is an emergency until it is determined an emergency response is not necessary.
- If you cannot contact your supervisor continue to make calls up the chain or to HSE until you have verbally spoken with someone and reported the incident/emergency. Voice mail is not an acceptable report.

Figure 1: Notification Procedures



3.0 INITIAL RESPONSE

3.1 INITIAL RESPONSE ACTIONS

Initial responses will be made in association with these priorities:

1. Protect life and public safety
2. Protect the environment
3. Protect company assets and reputation

It is important to note that the actions described in this section are intended only as guidelines. The appropriate response to a particular incident may vary depending on the nature and severity of the incident and on other factors that are not readily addressed.

The first Company representative on scene (often it will be the person who discovers the emergency situation) will function as the Initial Responder and Incident Commander until relieved by an authorized supervisor who will assume the role of Incident Commander. Whenever the Incident Commander is replaced a change-of-command must take place.

INITIAL RESPONSE ACTIONS - SUMMARY

- Assume responsibility and control of the situation
- Assess the incident – Is it Level 1, 2, or 3?
- Stabilize the situation, if able (render first aid, stop the release, hit E-stop, etc.)
- Protect personal and Public Safety first
- Call supervisor
- Call HSE
- Call 911, if needed
- Control the area - Evacuate as needed and prevent anyone from entering the area until first responders have arrived

The person functioning as the Person-In-Charge or Incident Commander during the initial response period has the authority to take the steps necessary to manage the situation.

4.0 INCIDENT MANAGEMENT

4.1 THE INCIDENT COMMAND SYSTEM

The National Incident Management System (NIMS) was developed by the U.S. Department of Homeland Security (DHS), under Homeland Security Presidential Directive (HSPD)-5. The **National Incident Management System (NIMS)** provides a systematic, proactive approach to guide departments and agencies at all levels of government, nongovernmental organizations, and the private sector to work seamlessly to prevent, protect against, respond to, recover from, and mitigate the effects of incidents, regardless of cause, size, location, or complexity, in order to reduce the loss of life and property and harm to the environment.

The Incident Command System (ICS) creates a standardized, on-scene, all-hazards incident management approach, which:

- Allows for the integration of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure.
- Enables a coordinated response among various jurisdictions and functional agencies, both public and private.
- Establishes common processes for planning and managing resources.

ICS is flexible. ICS can be used for incidents of any type, scope, and complexity. ICS allows users to adopt an integrated organizational structure to match the complexities and demands of single or multiple incidents.

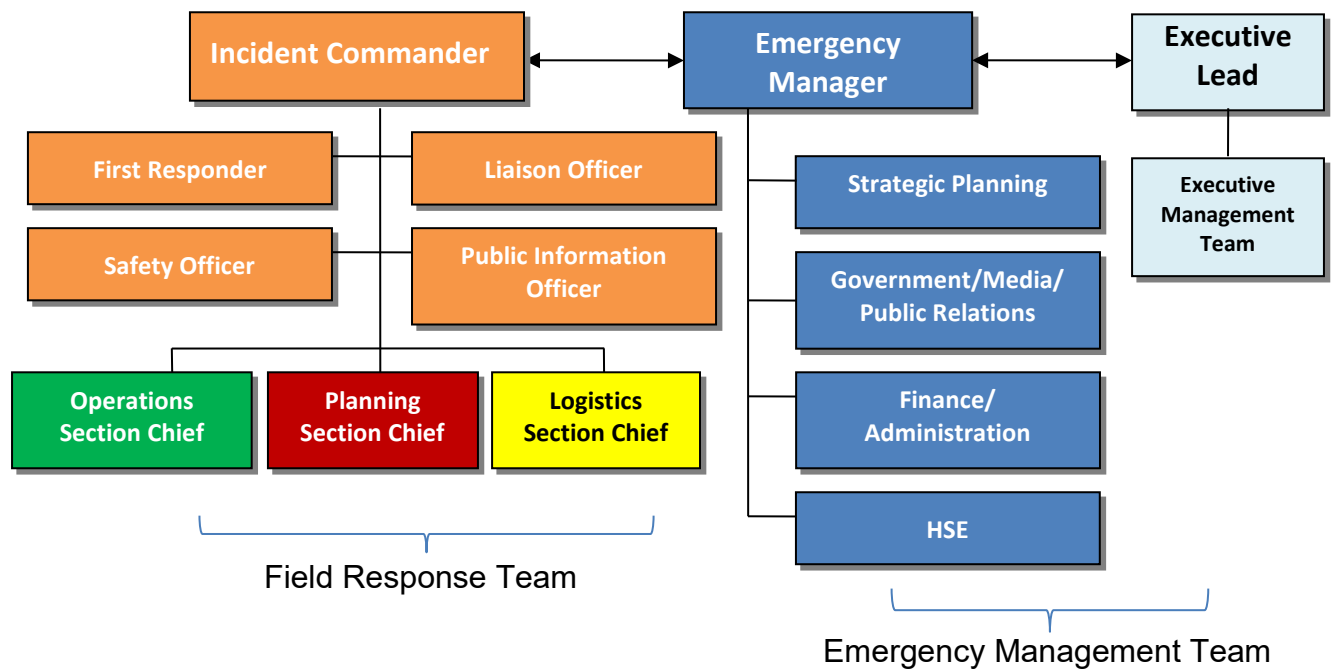
ICS is used by all levels of government—Federal, State, tribal, and local—as well as by many non-governmental organizations and private entities. ICS is applicable across many disciplines. It is typically structured to facilitate activities in five major functional areas: Command, Operations, Planning, Logistics, and Finance/Administration. All of the functional areas may or may not be used based on the incident needs and conditions.

As a system, ICS is extremely useful. ICS provides an organizational structure for incident management and guides the process for planning, building, and adapting that structure. Using ICS for every incident (and in every training element) helps hone and maintain skills needed for the large-scale incidents.

Pulsar Helium's ICS is a standardized on-scene incident management concept designed specifically to allow responders to adopt an integrated organizational structure equal to the complexity and demands of any single incident or multiple incidents without being hindered by operational boundaries.

An ICS enables integrated communication and planning by establishing a manageable span of control. ICS divides an emergency response into manageable functions essential for emergency response operations.

Figure 2: General Incident Command Structure



4.2 PH Incident Command Structure

PH's ICS organization is comprised of four functional elements: command, operations, planning, and logistics. In addition, the Emergency Management Team (EMT) may also be activated in the event of an emergency. The EMT will be based in either the Houston or Pleasanton offices.

The Field Response Team (FRT) consists of the Command Staff (in orange, Fig. 2) which includes the Incident Commander, Safety Officer, Liaison Officer, and Information Officer, and the General Staff consisting of three Section Chiefs: (1) Operations, (2) Planning, and (3) Logistics. This team is responsible for incident control and containment, public safety, and environmental monitoring and operates from the Incident Command Post (ICP – see Table 1).

The Incident Commander develops Incident Action Plans (IAP) and directs the Field Response Team (comprised of the Command and General Staff). The Incident Commander obtains support as necessary from the EMT, mutual aid partners, and assisting agencies. The EMT will reside in the Emergency Operations Center (EOC – see Table 1) for communications with the Incident Commander and his/her staff. The EMT provides support and advice to the Incident Command Staff and directly supports the Incident Commander, and also helps develop Incident Action Plans.

As part of the General Staff reporting to the Incident Commander, Chiefs coordinate their activities with other supervisory personnel at the same level, while

providing direction to assigned staff within their span of control. Chiefs are responsible for the accomplishment of assigned duties, including responsibility for the safety and health of the support personnel reporting to them, and:

- Are expected to work toward assigned objectives within the overall strategy defined by the checklists provided in the Quick Reference Guide and are supplemented by an Incident Action Plan (IAP). They are to report progress, or lack thereof, in accomplishing their duties and any deviation from the established IAP, to their direct report (typically the Incident Commander) on a regular basis.
- Should maintain a constant awareness of the position and function of all personnel assigned to operate under their supervision. This awareness is the basic means of accountability that is required to ensure operational / response safety.
- Should be alert to recognize conditions and actions that create a hazard within their span of control. Key Implementers have the authority and responsibility to take immediate action to correct imminent hazards and to advise their staff regarding these actions. Chiefs are responsible for the safety of their direct reports.

The Emergency Manager (EM) and the EMT in the Houston or Pleasanton EOC consist of leadership in the following departments: Strategic Planning Section, Government/Media/Public Relations, Finance/Administration, and HSE Teams. The Emergency Manager is responsible to notify and update the Executive Lead.

The Executive Lead (VP, COO, etc.) is empowered to redirect needed resources to the incident and ensure appropriate support is available to the EMT. The Executive Lead has an Executive Management Team consisting of Business and Media Support personnel. These Executive Team Members provide long-term support; assess the incident events in relation to impacts on PHS Helium corporate image, reputation, assets, and investor relations. It is the Executive Lead who contacts (when appropriate) the CEO and keeps him apprised of the situation.

Executive Leadership is not typically involved in decision processes related to the immediate control and containment issues but may be involved in a support role as public issues arise.

Personnel at each level of the command structure will receive direction from and are required to provide regular status reports to their immediate supervisor. It is recommended that the Incident Status Update Form be used as a format. A whiteboard or equivalent should also be used during response activities to provide a snapshot of current incident status to personnel.

Media/Reporters may contact Company representatives or show up on location. A Media Response Plan is located in Appendix F (page 53) and in the Emergency Action Plan. It is critical that only authorized representatives speak with the media! If confronted by media any unauthorized PH personnel should simply say "The Incident Commander or Public Information Officer will make a statement as soon as possible and will notify you as when and where that will happen. Until then please remain in the designated media area. Thank you."

Table 1 - Key Locations

Incident Command Post (ICP)	Pre-designated temporary facilities and signifies the physical location of the tactical-level, on-scene incident command and management organization. It typically comprises the Incident Commander and immediate staff and may include other designated incident management officials and responders from Federal, State, local, and tribal agencies, as well as private-sector, nongovernmental, and volunteer organizations. Typically, the Incident Command Post (ICP) is located at or in the immediate vicinity of the incident site and is the focus for the conduct of direct, on-scene control of tactical operations. Incident planning is also conducted at the ICP; an incident communications center also would normally be established at this location. The ICP may be collocated with the incident base if the communications requirements can be met. The ICP may perform local Emergency Operations Center-like functions in the context of smaller jurisdictions or less complex incident scenarios. It is commonly marked with a green emergency light, so as to be distinguished from a distance.
Emergency Operations Center (EOC) * Houston * Pleasanton	An Emergency Operations Center (EOC) is the physical location where the organization comes together during an emergency to coordinate response and recovery actions and resources. These centers may alternatively be called command centers, situation rooms, war rooms, crisis management centers, or other similar terms. Regardless of the term, this is where the coordination of information and resources takes place. The EOC is not an incident command post; rather, it is the operations center where coordination and management decisions are facilitated.

Table 2 – Key Positions (See the Emergency Response Guide for additional information on position roles)

First Responder	The First Responder is responsible for initiating and coordinating all initial emergency response activities on site. He/She holds the primary responsibility for evaluating the risks to on-site personnel with respect to the purpose and potential results of response actions in each situation.
Incident Commander	The Incident Commander is responsible for the overall coordination and direction of all response activities at the local level.

	This includes overall responsibility for the safety and health of all personnel and for other persons operating within the incident command system at the local level. For small emergencies, the Incident Commander may perform more than one role. Directing the activities of the command staff, the Incident Commander may establish the local Incident Command Center. All communications must flow into and out of the Incident Commander's position to ensure that accurate and timely information is received and disseminated and that an orderly, efficient response is mounted.
Safety Officer (Command Staff)	Ensures the safety of all on-site incident responders and is to develop and recommend measures for assuring personnel safety, and to monitor and/or anticipate hazardous and unsafe situations. Responsible for developing the Site Safety Plan. Only one Safety Officer will be assigned for each incident and works as a support officer for the IC. The Safety Officer may have assistants, as necessary. This position reports to the Incident Commander.
Operations Chief (General Staff)	Has responsibility for the direct management of all incident tactical activities, as well as the safety of all personnel working in the operations sections. Has direct involvement in the preparation and evolution of the Incident Action Plan. This position reports to the Incident Commander.
Liaison Officer (Command Staff)	Contact for agency representatives and mutual aid agencies. Assists the Incident Commander by making the phone calls or notifications to all personnel and agencies (as necessary) that are identified in this plan as directed by the Incident Commander. This position reports to the Incident Commander.
Public Information Officer (Command Staff)	Act as initial Company Spokesperson (using Preliminary Media Statement in the EAP). The spokesman will activate a Communications Plan for ongoing media support. Responsible for dissemination of the information about the incident to the news media, to incident personnel, and to other appropriate agencies and organizations. This position reports, initially, to the Incident Commander, but may eventually turn over responsibilities to the Emergency Management Team (EMT.)

Planning Chief (General Staff)	The Planning Section Chief is responsible for assessing the overall impact of the emergency, providing technical support, and developing the Incident Action Plan (IAP). The Chief of this Section reports to the Incident Commander but works with the EMT to develop the IAP. This position supports the Incident Commander.
Logistics Chief (General Staff)	The Logistics Section Chief is responsible for providing support resources to incident responders, such as personnel, supplies/equipment, food. This position supports the Incident Commander.
Staging Area Manager	Supervises pre-deployment area for personnel and equipment. This position reports to the Operation Section Chief.
Emergency Manager	The Emergency Manager is the primary management contact for the Incident Commander and is responsible for evaluating risks, potential impacts and consequences at the local and corporate levels. The Emergency Manager leads the EMT which consists of Strategic Planning, HSE, and Finance/Admin members, and makes notification to the Executive Lead.
Strategic Planning Section	The strategic planning lead supports the response by providing specialized expertise and resources such as engineering and operations. The section can provide specific technical information about the site/equipment involved. This position reports to the Emergency Manager.
Finance/ Administration Section (General Staff)	The Lead of this Section is responsible for tracking incident costs and reimbursement accounting. The Lead of this Section reports to the Emergency Manager. A Chief may be appointed at the local level. This position supports the Incident Commander.
Documentation Unit	Individual charged with overall documentation support to the Incident Command Team members, collecting time and event documentation and maintaining a chronological event summary of the incident. This position reports to the Planning Section Chief.
Other General Staff Unit/ Group Leaders	Unit/Group Leaders may provide tactical and planning and logistical support including, but not limited to: • HAZMAT (Control & Recovery); • Decontamination, • Response, • Recovery,

	• Situation, • Resources, • Medical, and • Rescue. • Unit/Group Leaders will take direction from and report to their appropriate Section Chief.
Executive Lead	The Executive Lead is the executive management contact for the Emergency Manager and is responsible for evaluating risks, potential impacts and consequences at the corporate level, addressing key business issues and strategic implications. The Executive Lead provides ongoing advice and support to the Emergency Manager and will be in contact with Executive Team members.
Other EOC Support Staff	Group Leads or other company representatives may be notified or called to assist in an emergency response, taking direction from and reporting to the Emergency Manager. These individuals will participate in the risk assessment, the development of the IAP, or provide support for incident responders. Additional participants may include but are not limited to representatives from: • Drilling and Completions, • Construction and Production, • Land, • Water, • Human Resources, • Legal, • HSE and Security, • Midstream, and • Information Services.

4.3 UNIFIED COMMAND

As a component of an ICS, the Unified Command (UC) is a structure that brings together the Incident Commanders of all major organizations involved in the incident to coordinate an effective response while still meeting their own responsibilities (PH, federal, state, and/or local responders/stakeholders). The UC links the organizations responding to the incident and provides a forum for Pulsar Helium and responding agencies to make consensus decisions. Under the UC, the various Federal, State, and Local jurisdictions and/or agencies and responders may blend together

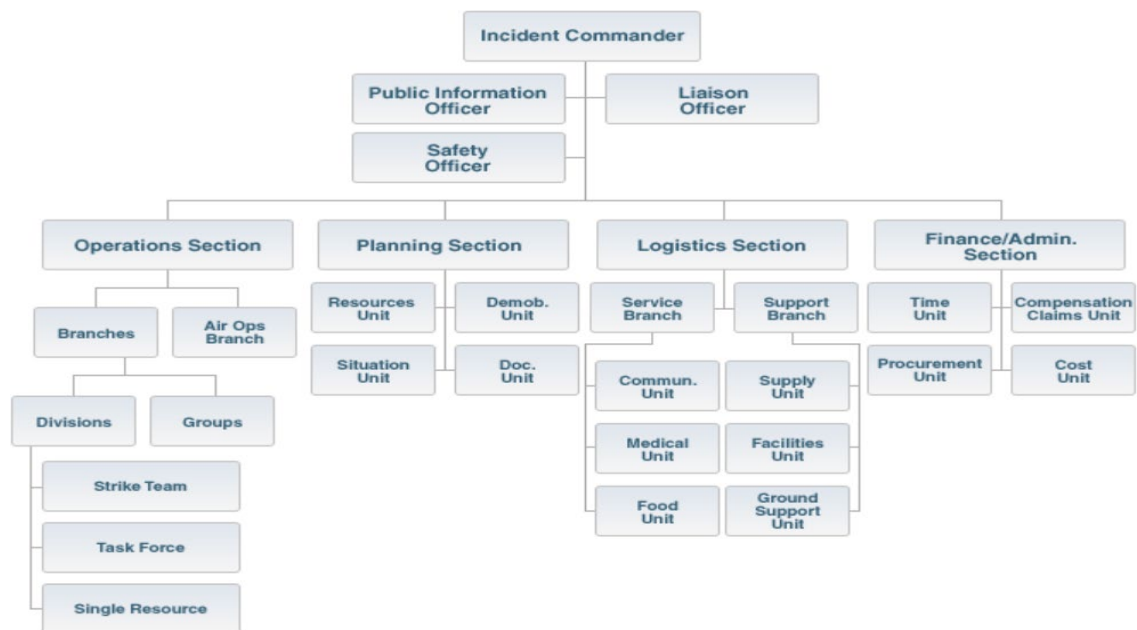
throughout the organization to create an integrated response team. The ICS process requires the UC to set clear objectives to guide the on-scene response resources.

The participants of Unified Command for a specific incident will be determined by taking into account the specifics of the incident and existing response plans and/or decisions reached during the initial meeting of the UC. The UC may change as an incident progresses in order to account for changes in the situation.

Unified Command representatives must be able to:

- Agree on common incident objectives and priorities
- Have the capability to sustain a 24-hour-7-day-a-week commitment to the incident
- Have the authority to commit agency or company resources to the incident
- Have the authority to spend agency or company funds
- Agree on an incident response organization
- Agree on the appropriate Command and General Staff assignments
- Commit to speaking with "one voice" through the Public Information Officer or Joint Information Center
- Agree on logistical support and cost sharing procedures

Figure 3: Example Full Field ICS Organization Chart (large, multi-day emergencies)



4.4 Incident Risk Assessment

During the initial and ongoing response, all appointed Incident Command supervisory personnel, specifically the First Responder, IC, and EM, should

continually evaluate the risk to personnel, public, and the environment with respect to the purpose and potential results of their actions in each situation.

The nature of the hazard(s) will influence the responses that are implemented by the First Responder and the Incident Commander.

Pulsar Helium manages risks associated with incident response actions based on the following principles:

- Activities that present an extreme risk to workers, responders and the public must be limited to only situations where there is a potential immediately dangerous to life or health situation. **Life safety is the number one priority in every incident; this includes the safety of responders.**
- Where there is no possibility to protect lives, personnel should not attempt extreme-risk operations.
- Activities to protect the environment or property are recognized as inherent risks to the safety of response personnel and actions should be taken to reduce or avoid these risks.
- Responders will follow company safety and environment policies, standard operating procedures, and safe work procedures.

All levels of risk require the appropriate risk transfer, reduction or elimination as well as appropriate actions and approvals within the Incident Command Team. In situations where the risk to personnel is extreme, activities will be limited to defensive and protective actions.

4.5 Incident Action Plans

Incident objectives and strategies are essential prerequisites to any written or oral IAP and should be established expeditiously (See examples in Table 3). The Incident Commander and Planning Chief (if assigned) are responsible for the development of strategic response objectives that clearly define what the Incident Command Team is working to achieve during response operations. Based upon the information presented at the initial incident planning meeting and analysis of incident potential and impacts, the Incident Commander and Key Implementers should have a clear understanding of the major problems that need to be addressed.

From this point, an Incident Action Plan (IAP) is to be developed which provides all supervisory personnel with appropriate direction for future actions. IAPs provide a coherent means of communicating the overall incident objectives in the context of both operational and support activities.

The checklists for each role in the Quick Reference Guide functions as the **initial** Incident Action Plan. The development of ongoing strategic IAPs will be coordinated by the Incident Commander or delegated to the Planning Chief if appointed. At the simplest level, IAPs have four elements:

- 1) What do we want to do?
- 2) How do we want to do it?
- 3) Who is responsible for doing it?
- 4) How do we communicate with each other?

The IAP will undergo continuous updating and refinement as more information is clarified and provided and the incident objectives change. The Incident Commander should ensure that any change in the IAP is communicated to all affected response team members.

Table 3 - Example Response Objectives and Strategies

Ensure the Safety of Public and Response Personnel	• Identify hazard(s) of spilled or released material • Establish site control (hot zone, warm zone, cold zone, and security) • Consider evacuations, as required • Establish aircraft restrictions, as required • Monitor air in impacted and predicted dispersion area • Develop site safety and health plan for response personnel • Ensure safety briefings are conducted
Control Source of Spill	• Complete emergency shutdown • Coordinate firefighting, if safe to do so • Initiate temporary repairs • Transfer product • Conduct salvage operations, as required
Manage Coordinated Response Effort	• Complete or confirm notifications • Establish a unified command organization and facilities (Incident Command Center, On-Site Command Post, Emergency Operations Center, etc.), as required • Ensure local officials and response support are included in response organization, as required
Manage Coordinated Response Effort (Continued)	• Initiate Incident Action Plan (IAP) • Evaluate planned response objectives vs. actual response (post-incident debriefing)
Maximize Protection of Environmentally Sensitive Areas	• Implement pre-designated response strategies • Identify resources at risk in spill vicinity • Track product movement and develop spill trajectories • Conduct visual assessments (e.g. over-flights) • Development and implement appropriate protection plans
Contain and Recover Spilled Material	• Evaluate time-sensitive response technologies (e.g. dispersants, in-situ burning) • Develop waste management plans • Conduct open-water skimming or booming if necessary

Remove Oil from Impacted Areas	• Conduct appropriate clean-up efforts • Clean oiled structures and equipment
Minimize Economic Impacts	• Consider tourism and local economic impacts throughout the response • Protect public and private assets • Establish a damage/claims process
Keep public and stakeholders informed of Response Activities	• Provide a forum to obtain outside input and concerns • Provide stakeholders with details of response actions • Identify stakeholder concerns and issues and address, as practical • Provide municipal and local officials and regulators details of response actions • Provide timely safety announcements • Conduct regular news briefings, managing media access to the spill response area

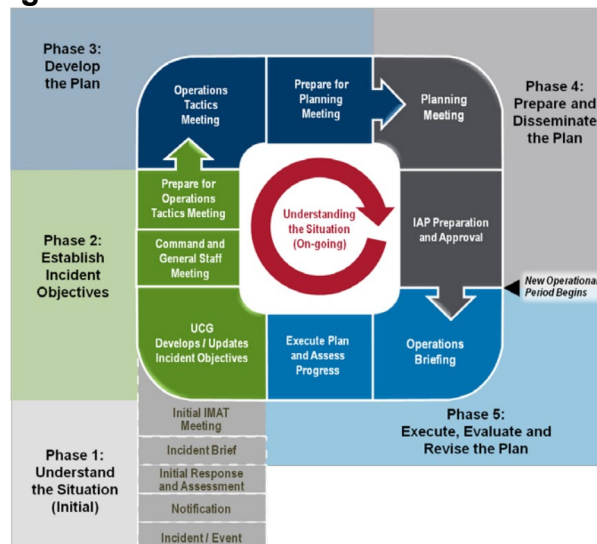
4.6. Ongoing Evaluation and Re-assessment

To ensure that appropriate actions are taken throughout the incident, additional incident assessments should be performed by the Incident Commander, First Responder and other ICS Chiefs to:

- Continuously evaluate the response actions taken,
- Conduct incident assessments,
- Define new objectives/strategies, and preparing an updated IAP, as required.

The planning cycle is just that, an ongoing process that is built around “The Planning P.”

Figure 4: The Planning Phases



4.7 Documentation/Records

For incidents that affect company operations, documentation should be maintained to allow proper management of the incident and to ensure that a historical record of response activities is available for future reference.

All personnel involved are responsible for maintaining a record of their activities during an emergency. At a minimum, all personnel should document their activities and outgoing and incoming contacts on a Time & Event Log and/or their Individual Log.

The Incident Commander may appoint a Documentation Lead and/or a Scribe to help maintain a written summary of the chronological events.

Important records include:

- Logs outlining communication and significant response actions and events.
- Incident Action Plans and status updates/briefings.
- Records or listings of personnel and functions.
- Records related to contacts with emergency agencies, media agencies, landowners, or the public.
- Records of contacts or meetings held with government agencies, including significant decisions that were made related to the incident.
- Photographs or maps made of the emergency site.
- Incident notification and investigation reports and supporting documentation.
- Bills or invoices for services provided by contractors or outside agencies during the emergency.
- Records of air monitoring, soil or water samples taken, performed during the incident.

The Incident Commander and Emergency Manager will ensure that all incident records are completed, gathered and stored for the subsequent post-incident investigation.

Once the emergency situation has been brought under control, the Emergency Manager will ensure that response personnel are debriefed as soon as possible.

4.8 Post-Incident Procedures

The decision to remove the emergency level status and resume normal operations is made by the Incident Commander in coordination with the Emergency Manager. This decision may need to have the approval of regulatory authorities (TRRC, OSHA, EPA, etc.).

The locally based post-incident procedures are carried out under the instruction and direction of the Incident Commander and Emergency Manager.

4.9 Accountability

The Incident Commander is accountable for initiating and managing the following field-based post-incident activities. The Emergency Manager is responsible for conducting corporate post-incident actions including standing down the EMT, as required.

- Give the “all clear” signal to remove the emergency status – consultation between Incident Commander, First Responder, Emergency Manager and involved regulatory authorities.
- Coordinating the deactivation of all emergency response operations.
- Establishing goals and objectives and delegating responsibility for the completion of post-incident and recovery tasks.
- Ensuring an incident investigation including an evaluation of response action is conducted.

4.10 De-Escalation of Incident

- Ensure that all response team members and on-site personnel, including contract personnel and emergency services, are notified about the emergency de-escalation.
- Ensure that emergency contacts made during the response are notified about the de-escalation.
- Advise all response team members to document their call-down notifications.
- Prepare and release a statement to the media as required (Coordinated through the IC and EM).
- Conduct a debriefing meeting and consider stress counselling as necessary for the response team members. Occasionally, some people are so seriously affected by the trauma of an incident that they cannot return to a normal work routine. They would probably display symptoms of such trauma during debriefing sessions by being highly agitated, or relating problems of stress, lack of sleep, or emotional upset. These people should be referred to medical professionals for treatment and may require extended counseling to return to normalcy.
- Notify and conduct debriefing meetings with joint interest and/or other stakeholders such as insurance company representatives as required.
- If the incident has affected many residents or has caused significant damage to private property or the environment, Emergency Management Team personnel may be required to develop a post-incident action plan to address issues in the affected community.

4.11 Demobilization

- If there has been a fatality or a serious injury, responders should not disturb the incident site until the police, regulatory officials, and/or company representatives can complete an investigation.
- Ensure that the key response positions of First Responder and Site Safety Lead continue throughout the clean-up and repair phase.
- Ensure that proper procedures are developed and implemented for the decontamination of equipment.

- Ensure that all hazardous waste is disposed of according to applicable regulations.
- Ensure that priority is given to clearing debris and restoring the site to normal operating conditions after the government and company investigations are complete.
- Demobilize and ensure that all safety/response equipment is cleaned, inspected and inventoried before it is returned to its normal storage location.
- Demobilize all roadblocks, staging and detour equipment.
- Ensure that all clean-up and repair actions follow safe-work procedures.
- Demobilize response centers, ensuring to gather all records (hard copy, electronic, whiteboard).
- Ensure that pages, forms, and checklists from all Emergency Response Manuals are collected
- Return the Emergency Operations Center to pre-incident ready condition.

4.12 Preparing for Follow-Up Investigations

- Collect and compile all statements, Time and Event Logs, forms and documentation for the incident including all electronic records.
- Always make copies of the originals and work from the copies only.
- Securely store all incident documentation. The protection of records is extremely important to ensure the evidence is complete and unchanged.
- Obtain all photographs and videos of the incident site and response.
- Ensure that all reports are provided to the investigative authorities as required.

NOTE: All photographs and videos of the incident site, in particular those taken at Pulsar Helium's request, are considered Pulsar Helium property and are to be turned over to Pulsar Helium upon request.

All forms are to be collected and provided to the HSE Officer.

4.13 Investigation and Work Resumption (after-injury or fatality)

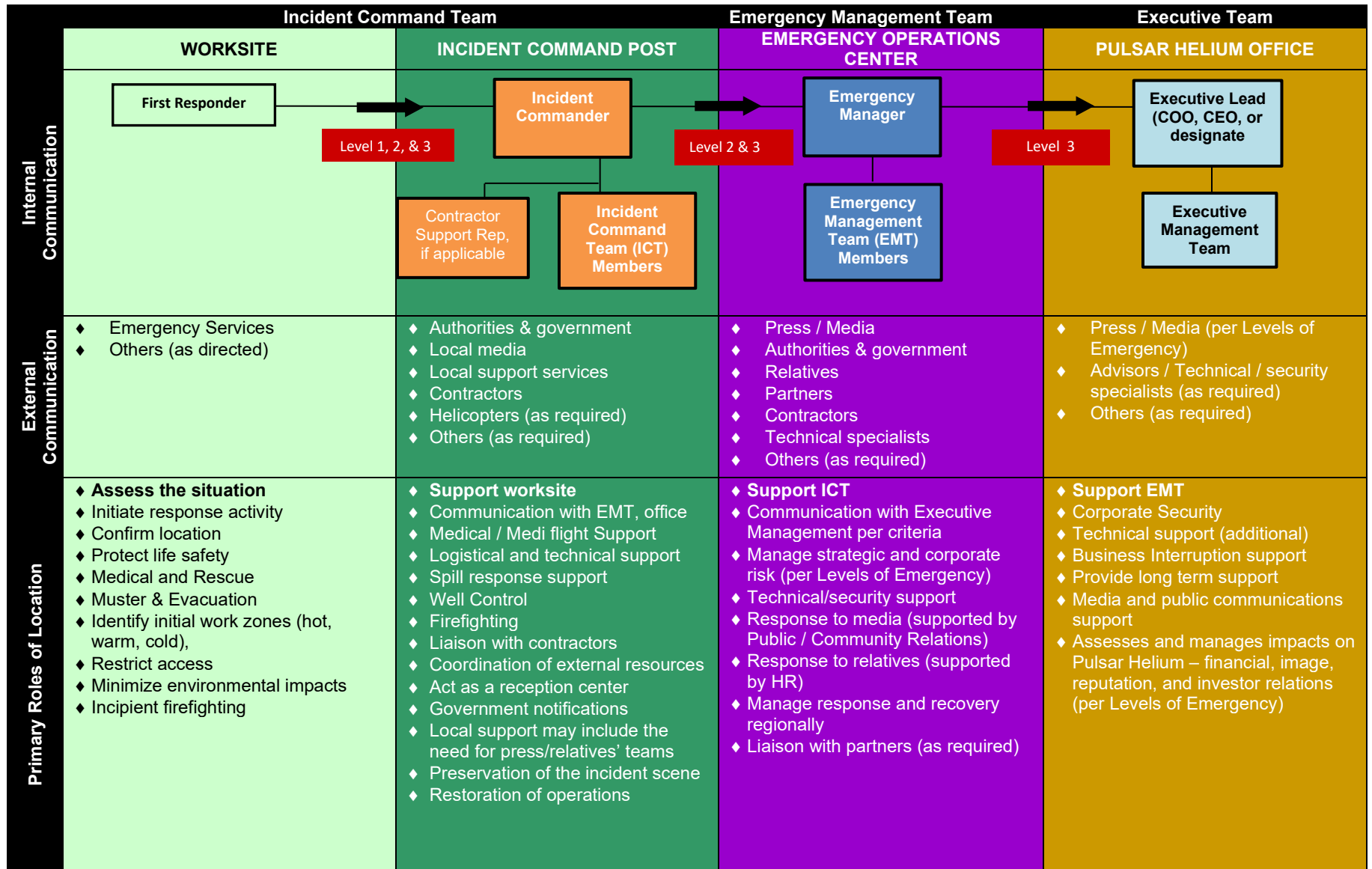
Following an incident where a serious injury or fatality has occurred, government agencies will investigate. When possible, write down the name, company, and telephone number of every person on location at the time of the incident. Their information could be valuable during the investigation. All government investigators should be asked to present their credentials upon arrival at the accident scene and, upon verification, are to be afforded full cooperation. Answer the regulatory agency questions but do not speculate on any answers.

The HSE Officer will coordinate internal investigations and follow-up written reports to any agency with the assistance of the Emergency Manager and Legal Counsel.

The Incident Commander shall ensure that all evidence is preserved in its original state. Do not allow removal of any equipment (evidence) that was on site at the time of the incident. If, due to some unusual circumstance, an item of evidence must be removed, do not allow it to be altered or destroyed and document its handling and whereabouts.

After a fatality or other major emergency, work at the scene must not resume until permission has been obtained from the local, state and/or federal agencies. In some cases, work shall not resume until Loss Control/ Insurance (insurance adjusters) has visited the site. The Incident Commander and HSE Officer shall be responsible for obtaining that permission.

Figure 5: Expected Roles and Communications



5. TRAINING AND DRILLS

5.1 RESPONSE TEAM TRAINING

Company personnel will respond to an emergency in accordance with their level of training and abilities while following procedures and utilizing personal protective equipment when necessary. At no time should a representative or contractor/visitor subject themselves or others to unnecessary risk nor act outside of their response capabilities.

Designated Company personnel will have received various levels of training in emergency response, including but not limited to:

- HAZWOPER
- Incident Command System
- Hazard Recognition and Prevention
- Abnormal Operations and Emergency Procedures

In the event of an emergency, designated company personnel are trained to:

- Notify affected personnel, company representatives, emergency responders, and regulatory agencies.
- Safely evacuate the area when an immediate threat to personnel exists.
- Secure affected the area and restrict access.
- Safely shut down and isolate systems.
- Start the Incident Command System.

HAZWOPER Training

Table 4: HAZWOPER TRAINING REQUIREMENTS		
Responder Classification	Required Training Hours	Refresher
29 CFR 1910.120(q) Emergency Response		
First Responder Awareness Level	2-4 hrs demonstration of competency	Same
First Responder Operations Level	8 hrs	8 hrs*
Hazardous Materials Technician	24 hrs (First Responder Operations Level plus competency)	8 hrs*
Hazardous Materials Specialist	24 hrs (Hazardous Materials Technician plus competency)	8 hrs*
Incident Commander	24 hrs(First Responder Operations Level plus competency)	8 hrs*

* Or sufficient content and duration to maintain competency.

Personnel are trained to the level necessary to perform their emergency response duties. Team members are required to have appropriate and up-to-date HAZWOPER training necessary to function in their assigned positions. Refresher training or a demonstration of competency is required annually to maintain HAZWOPER qualification.

Response Team

The Company requires that all response personnel, including contractors and casual labor, have the appropriate training necessary to serve on a response team during an emergency. Local team members will receive training in this Plan. Each Field Response Team member should review this Plan whenever the member's job position or responsibilities change under the Plan. A copy of this Plan will be available at all times to team members.

Field Response Team (FRT)

Designated FRT team members will receive ICS training and may also receive supplemental training in other related general topics.

Incident Commander: IC is trained to assume control of an incident. Training includes the Company's Incident Command System, how to implement this Plan, the associated risks of representatives working in chemical protective clothing, decontamination procedures, how to implement the local emergency response plan, and knowledge of the state emergency response plan and of the Federal Regional Response Team.

~~5.2 — H₂S SPECIFIC TRAINING CONSIDERATIONS~~

- ~~• The Company will train representatives working in H₂S areas and H₂S safety.~~
- ~~• The Company will require service companies to utilize trained personnel who work on H₂S systems or wells and where such work could expose workers to H₂S gas.~~

~~Personnel will be trained in the below:~~

- ~~• Hazards and Characteristics of H₂S~~
- ~~• Safety Precautions~~
- ~~• Equipment — Operation of Safety Equipment and Life Support System~~

~~On-site supervisory personnel will receive additional training on the following:~~

- ~~• Effects of H₂S on metals~~
- ~~• Corrective actions and shutdown procedures~~
- ~~• Well control — If a drilling operation~~
- ~~• Knowledge of contingency plan~~

Public Awareness

~~Procedures for coordinating an advanced briefing of the public within the area of exposure that will include the following:~~

- ~~• Hazards and characteristics of Hydrogen Sulfide~~
- ~~• Possible sources~~
- ~~• Instructions for reporting a leak~~
- ~~• Informing the public of a leak~~

5.3 TRAINING RECORDS AND MAINTENANCE

Training records for team members will be maintained according to Federal, State, and local government requirements. Records will be maintained for five (5) years.

5.4 Drills and Exercises

Exercises are conducted to evaluate the representative's capability to execute one or more portions of our Emergency Management Plan. The following are reasons to conduct exercises on a regular basis:

- Test and evaluate the plan, policies, and procedures.
- Reveal any weaknesses that may be in the plan and identify any resource gaps that may be present.
- Exercises improve individual performance, organizational communication, and coordination.
- Train personnel and clarify roles and responsibilities.
- Satisfy regulatory requirements.

An effective exercise program is made up of progressively complex exercises, each one building on the previous until the exercises are as close to reality as possible. Full-scale drills may involve a wide range of organizations to include fire, law enforcement, emergency management, and when necessary other agencies such as local public health, public safety, Red Cross and others as identified. Exercises should be carefully planned to achieve one or more identified goals.

Pulsar Helium ERP will be practiced through

- 1) Training
- 2) Drills and Exercises
 - a. Tabletop Drills
 - b. Functional Exercises

Drills will be conducted monthly on SIMOPS locations and Exercises will be practiced by Operations groups at least annually. HSE will coordinate, facilitate, and monitor the drills. Contractors will be responsible for conducting company/facility specific drills per their standard operating procedures (BOP Drills, etc.).

APPENDICES

APPENDIX A: INCIDENT SPECIFIC CHECKLISTS

These checklists for various types of emergency scenarios are intended to be used to help Incident Commanders and other emergency response team members ensure they touch on the basic "To Do's" during an event. These checklists are not all-encompassing and may be modified as needed to address specific situations. They are intended as guidelines. Each individual responsible for a response action must evaluate each action to ensure Personal Safety prior to conducting that action.

BLOWOUT			
Establish Safety of On-Site Personnel	☐ Call 911, evacuate to a safe location, account for all personnel on location ☐ Stabilize any injured personnel ☐ Activate Field Response Team		
Tactics	☐ Secure well if possible ☐ Shut-in facilities that may be affected. ☐ Contact Specialists to assist with securing well	☐ Activate Emergency Management Team ☐ Use Injury/Illness Report ☐ Use Damage Report ☐ Use Spill Report Form	
Initial Actions	☐ Assess the potential area of impact ☐ Contact local emergency services ☐ Contact HSE Representative		
Life Safety Factors	Site Safety Plan	Site Characteristics	
	☐ Employees Briefed	☐ Hot Zone Identified	
	☐ Company Representatives On-Site_	☐ Contract Employees On-Site_____	
	☐ Evacuation ☐ Escape route clear	Evacuation Means: ☐ Vehicle ☐ Other:	
	Muster/Accountability Status:		
	Missing:		
Injured:	Medical Aid:		
#Critical_____	#Delayed_____	☐ Medics On-Scene	
#Minor_____	#Deceased_____	☐ Medevac by Land/Air	
Notifications	Name	Contact Number	Date/Time Notified

SPILL/RELEASE					
Establish Safety of On-Site Personnel	☐ Call 911 if needed, evacuate to a safe location, account for all personnel on location ☐ Stabilize any injured personnel, shower/decontaminate exposed persons ☐ Activate Field Response Team				
Tactics	☐ Secure source if possible ☐ Shut-in facilities that may be affected. ☐ Contact Specialists to assist with spill clean up	☐ Refer to Applicable Pulsar Helium SPCC plan ☐ ID the product ☐ Ensure proper PPE used ☐ Isolate non-responders from the spill			
Initial Actions	☐ Mobilize personnel with proper PPE to berm/contain the spill	ID Incident Commander:			
	☐ Review SDS	Determine evacuation distances (see Emergency Response Guidebook, etc.)			
	☐ Contact EH&S Representative	Determine the estimate of volume spilled			
	<table border="1"> <thead> <tr> <th>Environmental Considerations</th> <th>Resources</th> </tr> </thead> <tbody> <tr> <td> ☐ Sewer Drains ☐ Streams, Creeks, Rivers, etc. ☐ Rain run-off </td> <td> ☐ Personnel ☐ Vehicle(s) ☐ Other: </td> </tr> </tbody> </table>		Environmental Considerations	Resources	☐ Sewer Drains ☐ Streams, Creeks, Rivers, etc. ☐ Rain run-off
Environmental Considerations	Resources				
☐ Sewer Drains ☐ Streams, Creeks, Rivers, etc. ☐ Rain run-off	☐ Personnel ☐ Vehicle(s) ☐ Other:				
Life Safety Factors	Site Safety Plan/SPCC ☐ Employees Briefed	Site Characteristics ☐ Hot Zone Identified			
	Muster/Accountability Status: Company Representatives on site_____ Contractors on site_____ Missing_____				
	Injured: #Critical_____ #Delayed_____ #Minor_____ #Deceased____	Medical Aid: ☐ Medics On-Scene ☐ Medevac by Land/Air			
Notifications	Name	Contact Number	Date/Time Notified		

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FIRE/EXPLOSION			
Establish Safety of On-Site Personnel	☐ Call 911, evacuate to a safe location, account for all personnel on location ☐ Stabilize any injured personnel ☐ Activate Field Response Team		
Tactics	☐ Evacuate all personnel not involved in response operations. ☐ Shut-in facilities that may be affected. ☐ Depressurize facilities that are affected. ☐ Activate Fire Fighting procedures	☐ Contact Specialists to assist with fire fighting ☐ Rescue personnel if safe to do so	
Initial Actions	☐ Notify supervisor	ID Incident Commander:	
	☐ Contact local emergency services	Consider expanding the exclusionary zone	
	☐ Contact EH&S Representative	Review SDS sheet(s)	
Life Safety Factors	Evacuation ☐ Escape route cleared	Evacuation Means: ☐ Vehicle ☐ Other:	
	Muster/Accountability Status:		
	Company Representatives on site _____ Contractors on site _____ Missing _____		
	Injured: #Critical _____ #Delayed _____ #Minor _____ #Deceased _____	Medical Aid: ☐ Medics On-Scene ☐ Medevac by Land/Air	
Notifications	Name	Contact Number	Date/Time Notified

NATURAL GAS LEAK

Establish Safety of On-Site Personnel	☐ Call 911 if needed, evacuate to a safe location, account for all personnel on location ☐ Stabilize any injured personnel ☐ Activate Field Response Team		
Tactics	☐ Evacuate all personnel not involved in response operations. ☐ Shut-in facilities that may be affected. ☐ Depressurize facilities that are affected.	☐ Activate Fire Fighting procedures ☐ Contact Specialists to assist with fire fighting ☐ Identify any areas downwind that may be affected	
Initial Actions	☐ Provide information on the type of gas, volume/rate, and wind speed/direction	☐ ID Incident Commander:	
	☐ Contact local emergency services	☐ Identify and isolate any potential ignition sources	
	☐ Contact HSE Representative	Isolate the scene and control access	
	Conditions	Resources	
Life Safety Factors	☐ Wind Direction _____ ☐ Wind Speed _____	☐ Personnel ☐ SCBA ☐ Other:	
	Evacuation ☐ Escape route clear	Evacuation Means: ☐ Vehicle ☐ Other:	
	Muster/Accountability Status: Company Representatives on site _____ Contractors on site _____ Missing _____		
	Injured: #Critical _____ #Delayed _____ #Minor _____ #Deceased _____	Medical Aid: ☐ Medics On-Scene ☐ Medevac by Land/Air	
Notifications	Name	Contact Number	Date/Time Notified

SEVERE WEATHER			
Establish Safety of On-Site Personnel	☐ Call 911, evacuate to a safe location, account for all personnel on location ☐ Stabilize any injured personnel ☐ Activate Field Response Team		
Tactics	☐ Monitor weather radio or television. ☐ Take shelter or evacuate? ☐ Shut in facilities and secure any loose items or large debris.	☐ Ensure all personnel are accounted for	
Initial Actions	☐ Maintain communication with ICP/EOC	ID Incident Commander:	
	☐ Contact Local Emergency Services and advise of actions taken.	Make notifications	
	☐ Inform all representatives of activities.	Secure the scene	
Life Safety Factors	Evacuation ☐ Escape route clear	Evacuation Means: ☐ Vehicle ☐ Other:	
	Muster/Accountability Status: Company Representatives on site_____ Contractors on site_____ Missing_____		
	Injured: #Critical_____ #Delayed_____ #Minor_____ #Deceased_____	Medical Aid: ☐ Medics On-Scene ☐ Medevac by Land/Air	
Notifications	Name	Contact Number	Date/Time Notified

ACTIVE SHOOTER			
Establish Safety of On-Site Personnel	☐ Call 911, evacuate to a safe location, account for all personnel on location ☐ Stabilize any injured personnel ☐ Activate Field Response Team		
	Tactics ☐ Run - Hide - Fight ☐ Rendering aid and evacuating ☐ Evidence preservation	☐ Cooperation with law enforcement	
Initial Actions	☐ Activate Alarms	ID Incident Commander:	
	☐ Contact local emergency services	Escape if possible, or	
	☐ Contact EH&S Representative.	Remain quiet (hide) until all clear given	
Life Safety Factors	Evacuation ☐ Escape route clear	Evacuation Means: ☐ Vehicle ☐ By foot ☐ Other:	
	Muster/Accountability Status: Company Representatives on site _____ Contractors on site _____ Missing _____		
	Injured: #Critical _____ #Delayed _____ #Minor _____ #Deceased _____	Medical Aid: ☐ Medics On-Scene ☐ Medevac by Land/Air	
Notifications	Name	Contact Number	Date/Time Notified

H₂S RELEASE/EXPOSURE

Establish Safety of On-Site Personnel	☐ Call 911 if needed and account for all personnel on location and evacuate non-injured to a safe area ☐ Refer to SDS or Emergency Response Guidebook for health dangers of H ₂ S ☐ Activate Field Response Team		
Tactics	☐ Evacuate all personnel to a safe zone. ☐ Use windsock to assist in locating area upwind ☐ If possible, shut-in facilities that may be affected ☐ Identify any areas downwind that may be affected ☐ If possible, identify and isolate any potential ignition sources ☐ Contact Specialists to assist with H ₂ S release	General Information: ☐ H ₂ S is heavier than air and will collect in low-lying areas ☐ Smells like rotten eggs and will deaden the sense of smell after prolonged exposure ☐ H ₂ S is explosive ☐ Escape packs are not for rescue	
Initial Actions	☐ Activate alarms and evacuate locations		☐ ID Incident Commander: ☐ Utilize H ₂ S Contingency Plan
	☐ Contact local emergency services ☐ Contact HSE Representative		
	Conditions		Resources
	☐ Wind Direction _____ ☐ Wind Speed _____		☐ Personnel ☐ Vehicle ☐ Other:
Life Safety Factors	Evacuation ☐ Escape route clear		Evacuation Means: ☐ Vehicle ☐ Other:
	Muster/Accountability Status: Company Representatives on site _____ Contractors on site _____ Missing _____		
	Injured: #Critical _____ #Delayed _____ #Minor _____ #Deceased _____		Medical Aid: ☐ Medics On-Scene ☐ Medevac by Land/Air
Notifications	Name Contact Number Date/Time Notified		

APPENDIX B: ICS Forms

ICS Forms are to be used as needed during an emergency. The Emergency Response Guide will probably be the official documentation of any Level 1 and some Level 2 Emergencies. For some larger or more complex Level 2 emergencies, and all Level 3's, the below forms will probably provide the most help, in particular, if it is a Unified Command situation.

ICS Forms are contained in a separate PDF file and are found [HERE](https://training.fema.gov/icsresource/icsforms.aspx) in the FEMA ICS forms booklet (<https://training.fema.gov/icsresource/icsforms.aspx>).

Standard ICS forms include, but are not limited to:

ICS FORM NUMBER	FORM TITLE	PREPARED BY*
201	Incident Briefing	Initial Response IC
202	Response Objectives	Planning Section Chief
203	Organization Assignment List	Resources Unit Leader
204	Division Assignment List	Operations Section Chief & Resources Unit Leader
205	Incident Radio Communications Plan	Communications Unit Leader
206	Medical Plan	Medical Unit Leader
209	Incident Status Report	Situation Unit Leader
214	Unit Log	All Sections
232	Resources at Risk Summary	Environmental Unit Leader
SSP	Site Safety Plan	Safety Officer

* The Planning Section Chief may assign preparation of forms to other personnel on the Incident Management Team if an identified position is unassigned or vacant when the IAP is produced.

APPENDIX C: ICS Position Descriptions

Below are summary descriptions of likely positions needed during an emergency (also see Table 2). The Incident Commander (IC) will scale the system to the emergency, and he/she may fill multiple roles and/or delegate as needed. The smaller the emergency, the fewer support roles required. In fact, for many Level 1 emergencies, the IC may be the only position filled (other than the 1st Responder). However, even “small” emergencies may require the Safety Officer position being filled to assist with any injuries, the evaluation of compromised equipment, and the investigation process.

For additional information or other potentially helpful descriptions please review relevant websites such as:

- [Department of Homeland Security Incident Management Summary \(Ready.gov\)](#)
- [ICS Resource Center - FEMA](#)
- [Incident Command System explanation and examples - FEMA](#)

Incident Commander

- In charge of the organization’s on-scene response
- Maintain command until public agencies arrive and assume command or when relieved at the start of the next operational period
- Assess the situation
- Order warning of persons at risk or potentially at risk to take appropriate protective actions
- Notify or verify internal teams, departments, public agencies, regulators, contractors, and suppliers have been notified
- Appoint others to incident command positions as needed
- Brief staff on current organization and activities; assign tasks; schedule planning meeting
- Determine the incident objectives and strategy; identify information needed or required by others; ensure planning/strategy meetings are held and attend as needed
- Coordinate activities with the EOC; identify priorities and activities; provide impact assessment for business continuity, crisis communications, and management
- Review requests for resources; confirm who has authority to approve procurement; approve all requests for resources as required
- Provide information to and coordinate with crisis communications or media relations team
- Terminate the response and demobilize resources when the situation has been stabilized

Safety

- Identify and assess hazardous situations; prevent accidents
- Prepare the safety plan; ensure messages are communicated
- Stop unsafe acts; correct unsafe conditions

Liaison

- Point of contact with outside agencies and companies

- Monitors operations to identify inter-organizational problems

Public Information

- Notify spokespersons and Crisis Communications Team
- Develop information for use in media briefings
- Obtain IC's and management approval for all news releases
- Conduct periodic media briefings
- Arrange for tours, interviews and or briefings
- Monitor and forward useful information to the media

Operations

- Manage all tactical operations during the incident
- Assist in the development of the operations portion of the Incident Action Plan
- Ensure safe tactical operations for all responders (in conjunction with any assigned Safety Officer)
- Request additional resources to support tactical operations
- Expedite appropriate changes in the operations portion of the Incident Action Plan
- Maintain close communication with the Incident Commander

Planning

- Conduct and facilitate planning meetings
- Supervise the preparation of the Incident Action Plan
- Determine need for technical experts from within the company or outside as well as specialized resources to support the incident
- Coordinate with business continuity and senior management teams
- Assemble information on alternative strategies and plans
- Assess current and potential impacts on people, property, environment
- Compile and display incident status information

Logistics

- Provides resources to stabilize the incident and support personnel, systems and equipment:
 - Workspace or facilities for incident management staff
 - Media briefing center
 - Transportation
 - Communications equipment
 - Food, water, shelter, and medical care
- Ensures Incident Command Post and other facilities have been established as needed
- Assesses communications needs and facilitates communications between teams/personnel/agencies
- Attends planning meetings; provides input to Incident Action Plan
- Provides updates on resources (availability, response time, deployment)
- Estimates and procures resources for the next operational period

Finance/Administration:

- Manages all financial aspects of the incident
- Provides financial and cost analysis information as requested
- Create accounts for claims and costs; coordinates with Logistics
- Tracks worker time and costs for materials and supplies
- Documents claims for damage, liability, and injuries
- Notifies risk management/insurance to initiate claims reporting
- Provides incurred and forecasted costs at planning meetings
- Provides oversight of financial expenditures, new leases, contracts and assistance agreements to comply with corporate governance

APPENDIX D: GLOSSARY AND ACRONYMS

GLOSSARY:

Agency: A division of government with a specific function offering a particular kind of assistance. In the Incident Command System, agencies are defined either as jurisdictional (having statutory responsibility for incident management) or as assisting or cooperating (providing resources or other assistance). Governmental organizations are most often in charge of an incident, though in certain circumstances private-sector organizations may be included. Additionally, nongovernmental organizations may be included to provide support.

Assessment: The process of acquiring, collecting, processing, examining, analyzing, evaluating, monitoring, and interpreting the data, information, evidence, objects, measurements, images, sound, etc., whether tangible or intangible, to provide a basis for decision-making.

Assigned Resource: Resource checked in and assigned work tasks on an incident.

Assignment: Task given to a personnel resource to perform within a given operational period that is based on operational objectives defined in the Incident Action Plan.

Assistant: Title for subordinates of principal Command Staff positions. The title indicates a level of technical capability, qualifications, and responsibility subordinate to the primary positions. Assistants may also be assigned to Unit Leaders.

Branch: The organizational level having functional or geographical responsibility for major aspects of incident operations. A Branch is organizationally situated between the Section Chief and the Division or Group in the Operations Section, and between the Section and Units in the Logistics Section. Branches are identified by the use of Roman numerals or by functional area.

Chain of Command: The orderly line of authority within the ranks of the incident management organization.

Chief: The Incident Command System title for individuals responsible for management of functional Sections: Operations, Planning, Logistics, Finance/Administration, and Intelligence/Investigations (if established as a separate Section).

Command: The act of directing, ordering, or controlling by virtue of explicit statutory, regulatory, or delegated authority.

Command Staff: The staff who report directly to the Incident Commander, including the Public Information Officer, Safety Officer, Liaison Officer, and other positions as required. They may have an assistant or assistants, as needed.

Continuity of Operations: An effort within individual organizations to ensure that Primary Mission Essential Functions continue to be performed during a wide range of emergencies.

Corrective Actions: The implementation of procedures that are based on lessons learned from actual incidents or from training and exercises.

Delegation of Authority: A statement provided to the Incident Commander by the Agency Executive delegating authority and assigning responsibility. The delegation of authority can include objectives, priorities, expectations, constraints, and other considerations or guidelines, as needed. Many agencies require written delegation of authority to be given to the Incident Commander prior to assuming command on larger incidents. (Also known as **Letter of Expectation**.)

Demobilization: The orderly, safe, and efficient return of an incident resource to its original location and status.

Deputy: A fully qualified individual who, in the absence of a superior, can be delegated the authority to manage a functional operation or to perform a specific task. In some cases, a deputy can act as relief for a superior, and therefore must be fully qualified in the position. Deputies generally can be assigned to the Incident Commander, General Staff, and Branch Directors.

Director: The Incident Command System title for individuals responsible for supervision of a Branch.

Division: The organizational level having responsibility for operations within a defined geographic area. Divisions are established when the number of resources exceeds the manageable span of control of the Section Chief. See **Group**.

Emergency: Any incident, whether natural or manmade, that requires responsive action to protect life or property. Under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, an emergency means any occasion or instance for which, in the determination of the President, Federal assistance is needed to supplement State and local efforts and capabilities to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the United States.

Emergency Management Team (EMT): An Emergency Manager and the appropriate Support Staff personnel assigned to an incident at the corporate level. The level of training and experience of the EMT members, coupled with the identified formal response requirements and responsibilities of the EMT, are factors in determining "type," or level, of EMT.

Emergency Operations Center (EOC): The physical location at which the coordination of information and resources to support incident management (on-scene operations) activities normally takes place. An EOC may be a temporary facility or may be located in a more central or permanently established facility, perhaps at a higher level of organization within a jurisdiction. EOCs may be organized by major functional disciplines (e.g., fire, law enforcement, medical services), by jurisdiction (e.g., Federal, State, regional, tribal, city, county), or by some combination thereof.

Emergency Public Information: Information that is disseminated primarily in anticipation of or during an emergency. In addition to providing situational information to the public, it frequently provides directive actions required to be taken by the general public.

Evacuation: The organized, phased, and supervised withdrawal, dispersal, or removal of civilians from dangerous or potentially dangerous areas, and their reception and care in safe areas.

Pulsar Helium Representative –Pulsar Helium Pleasanton employees, contractors, or sub-contractors.

Field Response Team (FRT): See Incident Management Team

Finance/Administration Section: The Incident Command System Section responsible for all administrative and financial considerations surrounding an incident.

General Staff: A group of incident management personnel organized according to function and reporting to the Incident Commander. The General Staff normally consists of the Operations Section Chief, Planning Section Chief, Logistics Section Chief, and Finance/Administration Section Chief. An Intelligence/Investigations Chief may be established, if required, to meet incident management needs.

Group: An organizational subdivision established to divide the incident management structure into functional areas of operation. Groups are composed of resources assembled to perform a special function not necessarily within a single geographic division. See **Division**.

Hazard: Something that is potentially dangerous or harmful, often the root cause of an unwanted outcome.

Incident: An occurrence, natural or manmade, that requires a response to protect life or property. Incidents can, for example, include major disasters, emergencies, terrorist attacks, terrorist threats, civil unrest, wildland and urban fires, floods, hazardous materials spills, nuclear accidents, aircraft accidents, earthquakes, hurricanes, tornadoes, tropical storms, tsunamis, war-related disasters, public health and medical emergencies, and other occurrences requiring an emergency response.

Incident Action Plan: An oral or written plan containing general objectives reflecting the overall strategy for managing an incident. It may include the identification of operational resources and assignments. It may also include attachments that provide direction and important information for management of the incident during one or more operational periods.

Incident Base: The location at which primary Logistics functions for an incident are coordinated and administered. There is only one Base per incident. (Incident name or other designator will be added to the term Base.) The Incident Command Post may be co-located with the Incident Base.

Incident Command: The Incident Command System organizational element responsible for overall management of the incident and consisting of the Incident Commander (either single or unified command structure) and any assigned supporting staff.

Incident Commander (IC): The individual responsible for all incident activities, including the development of strategies and tactics and the ordering and release of resources. The IC has overall authority and responsibility for conducting incident operations and is responsible for the management of all incident operations at the incident site.

Incident Command Post (ICP): The field location where the primary functions are performed. The ICP may be co-located with the Incident Base or other incident facilities.

Incident Management Team (IMT): An Incident Commander and the appropriate Command and General Staff personnel assigned to an incident. The level of training and experience of the IMT members, coupled with the identified formal response requirements and responsibilities of the IMT, are factors in determining “type,” or level, of IMT.

Incident Objectives: Statements of guidance and direction needed to select appropriate strategy(s) and the tactical direction of resources. Incident objectives are based on realistic expectations of what can be accomplished when all allocated resources have been effectively deployed. Incident objectives must be achievable and measurable, yet flexible enough to allow strategic and tactical alternatives.

Job Aid: Checklist or other visual aid intended to ensure that specific steps of completing a task or assignment are accomplished.

Joint Field Office (JFO): The primary Federal incident management field structure. The JFO is a temporary Federal facility that provides a central location for the coordination of Federal, State, tribal, and local governments and private-sector and nongovernmental organizations with primary responsibility for response and recovery. The JFO structure is organized, staffed, and managed in a manner consistent with *National Incident Management System* principles. Although the JFO uses an Incident Command System structure, the JFO does not manage on-scene operations. Instead, the JFO focuses on providing support to on-scene efforts and conducting broader support operations that may extend beyond the incident site.

Joint Information Center (JIC): A facility established to coordinate all incident-related public information activities. It is the central point of contact for all news media. Public information officials from all participating agencies should co-locate at the JIC.

Liaison: A form of communication for establishing and maintaining mutual understanding and cooperation.

Liaison Officer: A member of the Command Staff responsible for coordinating with representatives from cooperating and assisting agencies or organizations.

Logistics: The process and procedure for providing resources and other services to support incident management.

Logistics Section: The Incident Command System Section responsible for providing facilities, services, and material support for the incident.

Management by Objectives: A management approach that involves a five-step process for achieving the incident goal. The Management by Objectives approach includes the following: establishing overarching incident objectives; developing strategies based on overarching incident objectives; developing and issuing assignments, plans, procedures, and protocols; establishing specific, measurable tactics or tasks for various incident management functional activities and directing efforts to attain them, in support of defined strategies; and documenting results to measure performance and facilitate corrective action.

Manager: Individual within an Incident Command System organizational unit who is assigned specific managerial responsibilities (e.g., Staging Area Manager or Camp Manager).

Mitigation: Activities providing a critical foundation in the effort to reduce the loss of life and property from natural and/or manmade disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating safer communities. Mitigation seeks to fix the cycle of disaster damage, reconstruction, and repeated damage. These activities or actions, in most cases, will have a long-term sustained effect.

Mobilization Guide: Reference document used by organizations outlining agreements, processes, and procedures used by all participating agencies/organizations for activating, assembling, and transporting resources.

Multijurisdictional Incident: An incident requiring action from multiple agencies that each have jurisdiction to manage certain aspects of an incident. In the Incident Command System, these incidents will be managed under a Unified Command.

National Incident Management System (NIMS): A set of principles that provides a systematic, proactive approach guiding government agencies at all levels, nongovernmental organizations, and the private sector to work seamlessly to prevent, protect against, respond to, recover from, and mitigate the effects of incidents, regardless of cause, size, location, or complexity, in order to reduce the loss of life or property and harm to the environment.

Nongovernmental Organization (NGO): An entity with an association that is based on interests of its members, individuals, or institutions. It is not created by a government, but it may work cooperatively with government. Such organizations serve a public purpose, not a private benefit. Examples of NGOs include faith-based charity organizations and the American Red Cross. NGOs, including voluntary and faith-based groups, provide relief services to sustain life, reduce physical and emotional distress, and promote the recovery of disaster victims. Often these groups provide specialized services that help individuals with disabilities. NGOs and voluntary organizations play a major role in assisting emergency managers before, during, and after an emergency.

Officer: The Incident Command System title for a person responsible for one of the Command Staff positions of Safety, Liaison, and Public Information.

Operations Section: The Incident Command System (ICS) Section responsible for all tactical incident operations and implementation of the Incident Action Plan. In ICS, the Operations Section normally includes subordinate Branches, Divisions, and/or Groups.

Organization: Any association or group of persons with like objectives. Examples include, but are not limited to, governmental departments and agencies, nongovernmental organizations, and the private sector.

Personal Responsibility: The obligation to be accountable for one's actions.

Personnel Accountability: The ability to account for the location and welfare of incident personnel. It is accomplished when supervisors ensure that Incident Command System principles and processes are functional and that personnel are working within established incident management guidelines.

Planning Meeting: A meeting held as needed before and throughout the duration of an incident to select specific strategies and tactics for incident control operations and for service and support planning. For larger incidents, the Planning Meeting is a major element in the development of the Incident Action Plan.

Planning Section: The Incident Command System Section responsible for the collection, evaluation, and dissemination of operational information related to the incident, and for the preparation and documentation of the Incident Action Plan. This Section also maintains information on the current and forecasted situation and on the status of resources assigned to the incident.

Preparedness: A continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response. Within the *National Incident Management System*, preparedness focuses on the following elements: planning; procedures and protocols; training and exercises; personnel qualification and certification; and equipment certification.

Primary Mission Essential Functions: Government functions that must be performed in order to support or implement the performance of National Essential Functions before, during, and in the aftermath of an emergency.

Public Information: Processes, procedures, and systems for communicating timely, accurate, and accessible information on an incident's cause, size, and current situation; resources committed; and other matters of general interest to the public, responders, and additional stakeholders (both directly affected and indirectly affected).

Public Information Officer: A member of the Command Staff responsible for interfacing with the public and media and/or with other agencies with incident-related information requirements.

Recovery: The development, coordination, and execution of service- and site-restoration plans; the reconstitution of government operations and services; individual, private-sector, nongovernmental, and public assistance programs to provide housing and to promote restoration; long-term care and treatment of affected persons; additional measures for social, political, environmental, and economic restoration; evaluation of the incident to identify lessons learned; post-incident reporting; and development of initiatives to mitigate the effects of future incidents.

Resource Management: A system for identifying available resources at all jurisdictional levels to enable timely, efficient, and unimpeded access to resources needed to prepare for, respond to or recover from an incident. Resource management under the *National Incident Management System* includes mutual aid agreements and assistance agreements; the use of special Federal, State, tribal, and local teams; and resource mobilization protocols.

Safety Officer: A member of the Command Staff responsible for monitoring incident operations and advising the Incident Commander on all matters relating to operational safety, including the health and safety of emergency responder personnel.

Section: The Incident Command System organizational level having responsibility for a major functional area of incident management (e.g., Operations, Planning, Logistics, Finance/Administration, and Intelligence/Investigations (if established)). The Section is organizationally situated between the Branch and the Incident Command.

Span of Control: The number of resources for which a supervisor is responsible, usually expressed as the ratio of supervisors to individuals. Under the *National Incident Management System*, an appropriate span of control is

between 1:3 and 1:7, with optimal being 1:5, or between 1:8 and 1:10 for many large-scale law enforcement operations.

Staging Area: Temporary location for available resources. A Staging Area can be any location in which personnel, supplies, and equipment can be temporarily housed or parked while awaiting operational assignment.

Standard Operating Guidelines: A set of instructions having the force of a directive, covering those features of operations which lend themselves to a definite or standardized procedure without loss of effectiveness.

Standard Operating Procedure: A complete reference document or an operations manual that provides the purpose, authorities, duration, and details for the preferred method of performing a single function or a number of interrelated functions in a uniform manner.

Strike Team: A set number of resources of the same kind and type that have an established minimum number of personnel, common communications, and a leader.

Supervisor: The Incident Command System title for an individual responsible for a Division or Group.

Task Force: Any combination of resources assembled to support a specific mission or operational need. All resource elements within a Task Force must have common communications and a designated leader.

Technical Specialist: Person with special skills that can be used anywhere within the Incident Command System organization. No minimum qualifications are prescribed, as technical specialists normally perform the same duties during an incident that they perform in their everyday jobs, and they are typically certified in their fields or professions.

Type: An Incident Command System resource classification that refers to capability. Type 1 is generally considered to be more capable than Types 2, 3, or 4, respectively, because of size, power, capacity, or (in the case of Incident Management Teams) experience and qualifications.

Unified Approach: The integration of resource management, communications and information management, and command and management in order to form an effective system.

Unified Command (UC): An Incident Command System application used when more than one agency has incident jurisdiction or when incidents cross political jurisdictions. Agencies work together through the designated members of the UC, often the senior persons from agencies and/or disciplines participating in the UC, to establish a common set of objectives and strategies and a single Incident Action Plan.

Unit: The organizational element with functional responsibility for a specific incident planning, logistics, or finance/administration activity.

Unit Leader: The individual in charge of managing Units within an Incident Command System (ICS) functional Section. The Unit can be staffed by a number of support personnel providing a wide range of services. Some of the support positions are pre-established within ICS (e.g., Base/Camp Manager), but many others will be assigned as technical specialists.

Unity of Command: An Incident Command System principle stating that each individual involved in incident operations will be assigned to only one supervisor.

Acronyms:

Acronym	Title	ICS group (possible)
ACDR	AREA COMMANDER	Command
ACLC	AREA COMMAND, LOGISTICS CHIEF	Logistics
ACPC	AREA COMMAND, PLANNING CHIEF	Planning
APTL	ADMIN. PAYMENT TEAM LEADER	Finance
AQSP	AIR QUALITY SPECIALIST	Tech Spec
AREP	AGENCY REPRESENTATIVE	Command
BCMG	BASE CAMP MANAGER	Logistics
BUYL	BUYING TEAM LEADER	Finance
BUYM	BUYING TEAM MEMBER	Finance
CCOO	COMPUTER COORDINATOR	Tech Spec
CLMS	CLAIMS SPECIALIST	Finance
CMTL	COMPTROLLER	Finance
COMC	COMMUNICATIONS COORDINATOR	Tech Spec
COML	COMMUNICATIONS UNIT LEADER	Logistics
COMP	COMP/CLAIMS UNIT LEADER	Finance
CONO	CONTRACTING OFFICER	Finance
CP	COMMAND POST	
CREP	CREW REPRESENTATIVE	Operations
CRWB	CREW BOSS/CREW SUPERVISOR	Operations
DIVS	DIVISION/GROUP SUPERVISOR	Operations
DMOB	DEMOBILIZATION UNIT LEADER	Planning
DOCL	DOCUMENTATION UNIT LEADER	Planning
DOSC	DEPUTY OPERATIONS SECTION CHIEF	Operations
DOSP	DOCUMENTATION SPECIALIST	Tech Spec
DPIC	DEPUTY INCIDENT COMMANDER	Command
EFF	EMERGENCY FIREFIGHTER	Operations
EM	EMERGENCY MANAGER	Management
EMT	EMERGENCY MANAGEMENT TEAM	
ENGI	ENGINEER	Tech Spec
ENVL	ENVIRONMENTAL UNIT LEADER	Planning
EOC	EMERGENCHY OPERATIONS CENTER	
EOCC	EMERGENCY OPS CENTER COORD.	Tech Spec
EQPM	EQUIPMENT MANAGER	Logistics
EUL	ENVIRONMENTAL UNIT LEADER	Planning
FACL	FACILITIES UNIT LEADER	Logistics
FOBS	FIELD OBSERVER	Planning
FRT	FIELD RESPONSE TEAM	

GSUL	GROUND SUPPORT UNIT LEADER	Logistics
HAZM	HAZARDOUS MATERIALS SPECIALIST	Operations
HCO	HELICOPTER COORDINATOR	Air Ops
IAP	INCIDENT ACTION PLAN	Operations
IAR	INCIDENT ACTION REPORT	
IBA1	INCIDENT BUSINESS ADVISOR	Finance
ICSA	ICS ADVISOR	Command
IC	INCIDENT COMMANDER	Command
IMSM	INCIDENT MEDICAL MANAGER	Logistics
INCM	INCIDENT COMMUNICATIONS MGR	Logistics
IOF1	INFORMATION OFFICER	Command
LEIS	LAW ENFORCEMENT INVESTIGATOR	Tech Spec
LOFR	LIAISON OFFICER	Command
LSC1	LOGISTICS SECTION CHIEF	Logistics
MEDL	MEDICAL UNIT LEADER	Logistics
OCSP	OIL CONTAINMENT SPECIALIST	Logistics
OPBD	OPERATIONS BRANCH DIRECTOR	Operations
ORDM	ORDERING MANAGER	Logistics
OSC1	OPERATIONS SECTION CHIEF	Operations
PIO	PUBLIC INFORMATION OFFICER	Command
PROC	PROCUREMENT UNIT LEADER	Finance
PROS	PROCUREMENT SPECIALIST	Finance
PSC1	PLANNING SECTION CHIEF	Planning
RESL	RESOURCE UNIT LEADER	Planning
SAIT	SERIOUS ACCIDENT INVESTIGATION TEAM	
SECM	SECURITY MANAGER	Logistics
SITL	SITUATION UNIT LEADER	Planning
SOF1	SAFETY OFFICER	Command
SPUL	SUPPLY UNIT LEADER	Logistics
STAM	STAGING AREA MANAGER	Operations
STCR	STRIKE TEAM LEADER- CREW	Operations
SUBD	SUPPORT BRANCH DIRECTOR	Logistics
SVBD	SERVICE BRANCH DIRECTOR	Logistics
TFLD	TASK FORCE LEADER	Operations
UC	UNIFIED COMMAND	

Additional Terms:

[illegible]

APPENDIX E: EXTERNAL NOTIFICATION REFERENCES

IMPORTANT: **NO** external notifications are to be made to outside agencies (other than 911 services) without proper approval by the Incident Commander and/or Emergency Manager or delegate(s)!

REQUIRED NOTIFICATIONS

NATIONAL RESPONSE CENTER (NRC)

c/o United States Coast Guard (CG-3RPF-2) 2100 2 nd Street Southwest - Room 2111-B Washington, DC 20593-0001	(800) 424-8802 (24-hour) (202) 267-1322 (Fax)
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REPORTING REQUIREMENTS

TYPE: Any oil discharge that has impacted or threatens to impact navigable waters or release of a hazardous substance in an amount equal to or greater than the reportable quantity

VERBAL: Immediately

WRITTEN: Not Required

Request fax confirmation of report

U.S. ENVIRONMENTAL PROTECTION AGENCY REGION V (EPA)

77 West Jackson Blvd Chicago, IL 60604	(800) 621-8431 (312) 353-2318
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REPORTING REQUIREMENTS

TYPE: Any oil discharge that has impacted or threatens to impact navigable waters or release of a hazardous substance in an amount equal to or greater than the reportable quantity

VERBAL: Immediately

WRITTEN: Not Required

Request fax confirmation of report

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA)

200 Constitution Avenue Washington, DC 20210	(800) 321-6742
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Minnesota Occupational Safety and Health Administration (MNOSHA)

443 Lafayette Rd St Paul, MN 55155	(651) 284-5050 (877) 470-6742
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REPORTING REQUIREMENTS

TYPE: Fatality from a work-related incident within 8 hours. The inpatient hospitalization of 1 or more employees, amputation, or eye loss as a result of a work-related incident within 24 hours.

VERBAL: Within eight (8) hours

WRITTEN: As requested by the Agency

NOTE: As of November 2023 Pulsar Helium has no DOT pipelines and no PSM facilities. This information is included for future reference.

REQUIRED NOTIFICATIONS (Cont'd)

DEPARTMENT OF TRANSPORTATION OFFICE OF PIPELINE SAFETY AND HAZARDOUS MATERIALS

U.S. Department of Transportation 1200
New Jersey Avenue SE-E-22-321
Washington, District of Columbia 20590

(202) 366-4595
(202) 267-2675
NRC Direct
(202) 366-4433 PHMSA Switchboard

REPORTING REQUIREMENTS

TYPE: In addition to the reporting of accidents to the NRC, a written accident report (PHMSA Form 7000-1, <https://portal.phmsa.dot.gov/portal>) must be submitted for releases resulting in any of the following:

1. Explosion or fire not intentionally set by the operator.
2. Release of five gallons or more of hazardous liquid or carbon dioxide, except that no report is required for a release of fewer than five barrels resulting from a pipeline maintenance activity if the release is:
 - a. not one described under the NRC's reporting conditions.
 - b. confined to the property or pipeline right-of-way, and
 - c. cleaned up promptly.
3. Death of any person.
4. Personal injury necessitating hospitalization.
5. Estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000.

VERBAL: The NRC must be notified within one (1) hour of confirmed discovery of an incident and a follow-up report, including an estimate of product lost, within 48 hours.

WRITTEN: As soon as practicable, an accident meeting any of the above criteria must be reported on PHMSA Form 7000-1. The report must be sent to DOT no later than 30 days after the release. Changes or additions to the original report (PHMSA Form 7000-1) must be filed as a supplemental report within 30 days.

REQUIRED NOTIFICATIONS (Cont'd)

Minnesota Pollution Control Agency

REPORTING REQUIREMENTS

TYPE: All spills of products that meet or exceed state RQs and actual or threatened unauthorized discharges of petroleum products into coastal waters and/or discharges onto land that exceed 25 gal.

VERBAL: Immediately.

WRITTEN: As the agency may request depending on circumstances.

NOTE:

REPORTING REQUIREMENTS

TYPE: Immediately for all spills that impact or threaten fish and wildlife.

VERBAL: Immediately.

WRITTEN: As requested by the Agency.

NOTE: N/A

APPENDIX F: MEDIA RESPONSE PLAN

Pulsar Helium personnel, consultants and contractor personnel providing services on behalf of Pulsar Helium (Pulsar Helium or the Company) must not be interviewed by anyone unless the Incident Commander and/or company spokesperson has given prior approval. In most cases, the Company Spokesperson will be or have a designated person assigned for such interviews (Public Information Officer (PIO)).

All media requests should be referred to the Pulsar Helium Public Information Officer, spokesperson, or Incident Commander. Other company personnel are not to give interviews or make statements to the media without authorization. If media (reporters, camera crews) arrive on location, designate a safe area away from hazards as a 'designated media area' and ensure the media remains in that area. This may mean a Pulsar Helium Representative monitor them as long as they are on site.

Note: If a party's attorney(s) are present or show up at the interview, politely adjourn the interview and notify the Pulsar Helium Company Spokesperson immediately. Personnel must not give any work-related interviews, affidavits, written or recorded statements, or depositions without the express approval from the Pulsar Helium Company Spokesperson or Legal Representative.

If Pulsar Helium representatives or personnel are asked by non-attorneys for an interview (law enforcement, government officials, media, etc.), inform the Company Spokesperson and Incident Commander before the interview. If the interview is recorded or documented, a copy of the recording(s) and notes will be requested to avoid information being misrepresented. If a copy cannot be guaranteed, check with the Company spokesperson before the interview.

Management prefers that families of personnel involved in an incident receive initial notification from a Pulsar Helium representative and not the media, so no names of injured personnel may be given to the media until this is done.

What to do when talking with the media or reporters:

DO

1. Identify yourself as the company spokesperson
2. Be calm, courteous and truthful
3. Speak only for your company, not contractors or other third parties
4. Give a brief list of the facts (a statement should have been developed before speaking with media and may include a timeline, general description of the incident, current and next steps in the response, time of the next briefing)
5. End interviews promptly afterward (see below)
6. Advise other employees/representatives to refer all inquiries to you
7. Ensure the media remains in the designated media area to be briefed at scheduled times

DON'T

1. Speculate on causes of crisis, accident, or number of injured persons, if any

2. Discuss identities or medical conditions of injured or missing
3. Estimate damage
4. Allow reporters or “sightseers” to wander around the scene
5. Discuss confidential items within earshot of persons you don’t know

**GENERAL MEDIA RESPONSE FOR PERSONNEL OTHER THAN
COMPANY SPOKESMAN/PUBLIC INFORMATION OFFICER)**

1. Please move to the designated safe area for news media
2. My name is __, I am a _____ for Pulsar Helium. I cannot speculate on the incident. We are assessing the situation and will have a spokesperson available to answer your questions as soon as possible. You are welcome to wait but you must remain in this area, for your safety, until the spokesperson arrives.

Do not discuss the incident further with the media. Wait for the spokesperson to arrive. Respond to questions with “I don’t want to speculate; the spokesperson will be here as soon as possible.” Do not say “No comment.”

APPENDIX G: ADDITIONAL RESOURCES

[illegible]