

Please read this policy and sign/date at the end of this document.

**Anadarko Petroleum  
Corporation Contractor  
Compliance PROGRAM  
(APCCP)**

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## Anadarko Petroleum Contractor Compliance Program (APCCP) SUBSTANCE ABUSE POLICY

### 1.0 INTRODUCTION

The Anadarko Petroleum Contractor Compliance Program (APCCP) provides a standardized program for drug and alcohol testing for all employees of third-party contractors working at participating owner sites, and avoids duplicate testing of employees transferred to other owner sites with different policies.

For purposes of administering a uniform substance abuse policy, all contractor companies are considered a single entity: the Anadarko Petroleum Contractor Compliance Program (APCCP). All employees of third-party contractors (hereinafter referred to as “contractor employees”) of this consortium meeting the requirements of this policy would have an ‘Active’ status and are eligible to work at all participating owner sites. (Each owner, however, shall retain the option of instituting a separate policy to govern the re-entry of contractor employees with a prior ‘Inactive’ status who have completed recommended rehabilitation requirements and have been designated ‘Active.’)

The policy has been established to achieve the following goals:

- Promote a safe work environment, by reducing workplace accidents and injuries resulting from the use of illegal drugs and misuse of alcohol;
- Standardize individual owner site requirements to reduce the cost of repetitious substance testing of contractor employees;
- Expedite access of contractor employees to owner job sites without the delay and cost of waiting for test results;
- Preserve the dignity of the working men and women through standardized testing procedures; and
- Provide a program that can be easily audited to ensure compliance.

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## 2.0 APCCP STATEMENT

Anadarko Petroleum Corporation (APC) is committed to establishing the highest standards of safety and health at work, by maintaining a work environment that is free of drugs and alcohol, and reducing workplace accidents and injuries resulting from the use of illegal substances and misuse of alcohol. The APCCP's goal is to provide a fair and objective program that will deter the use of illegal drugs and misuse of alcohol and assist in the detection of substance abusers. This program shall be subject to approval and audit by APC.

The use of illegal drugs and alcohol is prohibited on owner sites. APC also prohibit contractor employees from reporting to work or being on owner premises with substances exceeding stated limits in their systems. Contractors shall not knowingly utilize the services of any person on owner premises who has failed or refused to take a drug and alcohol test (hereinafter referred to as **test**), or otherwise violated the requirements of this policy.

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### **3.0 DRUG AND ALCOHOL TESTING PROGRAM**

#### **3.1 Applicability and Individuals Subject to Testing**

Any contractor applicant or employee entering owner facilities or performing any operating or maintenance function on owner property is considered to be working in a safety-sensitive position and is subject to testing under this policy. This includes full-time, part-time, and temporary contractor employees.

#### **3.2 Substances Tested**

Although all illegal substances, whether under applicable federal, state, or local laws are prohibited on owner sites, the 10 substances listed in Appendix 2 (Drug and Alcohol Panel) are of particular concern. Substances shall be added or deleted from the list at APC’s discretion. Contractors shall be notified of changes.

#### **3.3 Definition of Illegal Drugs (Substances)**

An ‘illegal drug’ includes any drug the possession or use of which is made unlawful under federal, state, or local law, and/or that is not legally obtainable or is legally obtainable but has been obtained illegally.

Marijuana is considered to be an illegal drug for purposes of this policy in all states to the maximum extent allowed under applicable state or local law. Even if a contractor employee’s use of marijuana may otherwise be permissible under state or local law, the use or possession of marijuana or being under the influence or impaired by marijuana in the workplace or while performing work for an owner is strictly prohibited, to the extent permitted by state or local law.

#### **3.4 Illegal Use and Use of ‘Borrowed’ Prescription Medicines**

The use of any illegal drug or controlled substance (Schedules 1 through V of Section 202 of the Controlled Substances Act) is prohibited at all times unless a legal prescription has been written for the use of the substance. This includes, but is not limited to, the substances listed in Appendix 2, as well as any substance that causes the presence of these drugs or their metabolites, such as hemp products, coca leaves, or any substance not approved for medical use by the U.S. Drug Enforcement Agency (DEA) or the U.S. Food and Drug Administration (FDA). Illegal use includes use of any illegal drug, misuse of legally prescribed drugs, and the use of illegally obtained prescription drugs. Consistent with federal law, use of another person’s prescription medication, including a spouse’s cough or pain medication, shall be considered unauthorized use of medication. The use of a drug that can only be obtained by prescription in the United States but may be available without a prescription in another country, without a verifiable legitimate medical explanation, or with clinical evidence of abuse, shall be considered unauthorized use. The ‘use’ of a drug means the presence of the drug in the body while the employee is on duty. Positive results as defined by policy cut-off limits on a drug test or alcohol test are sufficient to support the ‘use’ of a drug.

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### 3.5 Use of Prescription Medications, Including ‘Old’ Prescriptions

Legal drug use, as reflected by a verified prescription, results in a verified ‘negative’ by the medical review officer (MRO). Although a drug test may be verified negative by the MRO for use of a prescription drug, the MRO shall report to the designated employee representative (DER) any safety concerns in prescription drug use, or when the employee has a medically disqualifying condition. All prescription drug use shall be under the contemporaneous supervision of a treating physician. If any prescription drug being used was obtained more than two years ago, follow-up with a treating physician is required, and a substance abuse professional (SAP) evaluation may be required.

When taking over-the-counter drugs or physician-prescribed drugs, each contractor employee should ask his or her health care provider whether such drugs may adversely affect his or her ability to safely perform assigned duties. Particular attention should be paid by the contractor employee to warnings of potential side effects that might include drowsiness or other impairments. Working while using or being under the influence of a legal drug (that is, a drug that has been legally prescribed and is used solely for its prescribed purpose, or an over-the-counter drug that has been legally obtained and is being used for its FDA-approved purpose) is prohibited if that use may affect an individual’s ability to perform his/her job safely.

In the event that a contractor employee and his/her employer are uncertain as to whether an over-the-counter drug or physician-prescribed drug causes an impairment which prevents the contractor employee from safely performing his/her work, the contractor employee and his/her employer shall promptly contact the MRO for an evaluation. The contract employee and his/her employer should fully provide all relevant information to the MRO and participate in the process fully and in good faith. The MRO will make a medical determination as to whether the contractor employee may perform his/her job duties safely while taking the over-the-counter drug or physician-prescribed drug. Any work restrictions imposed upon a contractor employee due to use of an over-the-counter drug or physician-prescribed drug shall be consistent with all requirements of the Americans with Disabilities Act and any similar state or local law.

Please note that the use, possession and cultivation of “medical marijuana” is illegal as a matter of federal law. If a contractor employee has a valid prescription for “medical marijuana,” it will be considered on a case-by-case basis to the extent required by applicable state and/or local law.

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**3.6 Possession and Consumption of Drugs**

Consistent with the Drug-free Workplace Act of 1988, contractor employees are prohibited from engaging in the unlawful manufacture, distribution, sale, attempted sale, conveyance, purchase, dispensing, possession, or use of prohibited substances while on owner premises, or while on duty.

**3.7 Prohibitions on Use of Alcohol and Other Alcohol-related Conduct**

Contractor employees are prohibited from reporting for, or remaining on duty, while having an alcohol concentration of 0.01 or higher. Contractors who have knowledge that a contractor employee has an alcohol concentration of 0.01 or higher shall not allow the contractor employee to enter or perform work on owner sites.

**Alcohol Concentration of 0.01 or higher**

A contractor employee with a positive test result (0.01 or higher) shall be immediately removed from owner sites.

**Pre-Duty Use and On-Call Employees**

In addition to the requirement that contractor employees may not have an alcohol concentration of 0.01 or higher, contractor companies shall prohibit contractor employees from using alcohol within 4 hours prior to reporting to owner sites. Contractor employees who are not on owner sites but could be called to duty at any time are subject to the pre-duty alcohol prohibition. Any contractor employee who is under the influence when called to duty must notify company personnel when contacted.

**On-Duty Use and Other Prohibited Conduct**

Contractor companies shall prohibit contractor employees from the possession, distribution, or consumption of alcohol while on owner premises, or while on duty.

**Alcohol Use Following an Accident**

If a contractor employee is required to take a post-accident/incident test, the contractor employee shall not use alcohol for 8 hours following the accident or until he/she has taken a post-accident alcohol test, whichever occurs first.

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## 4.0 APCCP PROGRAM TERMS

### 4.1 ‘Active/Inactive’ Status and Verification System

The system will designate contractor employees as being either ‘**Active**’ or ‘**Inactive**’. Contractor employees failing to comply with the requirements of this policy will be designated as ‘Inactive’. Contractor employees who have demonstrated compliance with the requirements of this policy will be designated as ‘Active’. The designation of an ‘Active’ or ‘Inactive’ status does not imply use or abuse of substances.

The testing and verification process will be managed by ASAP Drug Solutions, Inc. Participating contractors and owners will have access to the APCCP database for verification of each contractor employee’s status. Owners may verify only an employee’s status and will not have access to drug test results (with the exception of tests conducted under Section 5.7, entitled ‘Owner Initiated or Wall-to-Wall Testing.’)

Participating contractors and owners have the right to exclude ‘Inactive’ employees from access to owner sites. An ‘Active’ designation makes an employee ‘eligible for’ but does not guarantee access to a participating owner’s site. For access, an employee may need to comply with specific owner requirements outside of this policy.

When an individual is no longer an employee, the contractor must remove him/her from the contractor company’s random pool through ‘deactivation’. Such ‘deactivation’ will place the individual and his/her status into the ‘awaiting assignment pool’.

### 4.2 Definitions of Status and APCCP Terms

#### ‘Active’ and ‘Inactive’ status:

**Active** indicates that the contractor employee is a member of the Anadarko Petroleum Contractor Compliance Program who complies with the APCCP program. ‘Active’ contractor employees are eligible to work at participating owner sites.

**Inactive** indicates that the contractor employee is ineligible for entry onto owner sites.

**Inactive-Not-on-File** indicates that the contractor applicant/employee has not yet completed drug and alcohol testing within the APCCP program. This individual will need to complete a ‘new member’ application form and will require a verified negative pre-enrollment/pre-employment test to achieve an ‘Active’ status in the APCCP Consortium.

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**Inactive-Pending** indicates that further action is required before the contractor employee is eligible for entry onto owner sites.

**Inactive-Retest** indicates that the contractor employee must take a drug and alcohol test before eligibility for entry onto owner sites can be determined.

**Active A-A and Inactive A-A** (awaiting assignment) applies to consortium members no longer performing contract work at owner sites and who have no need to be in a contractor company’s random pool. These individuals will be ‘deactivated’ by the DER from the company’s random pool and placed in the ‘awaiting assignment’ pool, making them potentially eligible for immediate employment. ‘Active’ members will be designated ‘Active A-A’ when they are placed in the ‘awaiting assignment’ pool. ‘Inactive’ members will be designated ‘Inactive A-A’ when they are placed in the awaiting assignment pool. ‘Active A-A’ members in the awaiting assignment pool are subject to the 50% random selection rate requirements of the APCCP policy.

**Definitions of terms used in the APCCP**

**ASAP Drug Solutions, Inc.** – The administrator (C/TPA) that provides and coordinates drug and alcohol testing services of contractor employees under the APCCP Policy. Its responsibilities include, but are not limited to, administrative and management tasks such as test administration, random test selection, record management, and data maintenance.

**Deactivation** – Process of ‘moving’ or ‘reassigning’ a contractor employee from a company random pool to the ‘awaiting assignment’ pool.

**Contractor Employee** – Any contractor employee subject to substance testing under the APCCP Policy, including applicants for employment.

**Contractor Employer** – Any individual or entity employing one or more individuals working on owner sites and subject to substance testing under the APCCP Policy. The term means the entity responsible for overall implementation of the APCCP Policy requirements. The terms ‘contractor employer’ ‘contractor’ or ‘employer’ includes the owner/s, management personnel, and representative/s of the contractor company.

**Anadarko Petroleum Contractor Compliance Program (APCCP)** – A program jointly consisting of a group of contractor employers joined as a single entity for the purpose of administering a uniform drug and alcohol policy for all contractor employees desiring to maintain eligibility to work on owner sites.

**Owner** – Any production plant (company or representative of the company) that sponsors the APCCP program.

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**Safety and Environmentally Sensitive Position** – Any position that includes duties with the risk for causing physical injury to self, co-workers, the general public or damage to the environment or property, as well as duties directly related to reducing that risk.

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**5.0 TYPES OF DRUG AND ALCOHOL TESTS REQUIRED**

Employee members shall be subject to substance abuse testing as follows:

- Pre-Enrollment (Pre-Employment)
- Random
- Pre-Access
- Reasonable Suspicion/For Cause
- Owner Initiated or Wall-to-Wall
- Post-Accident/Incident
- Other

**5.1 Pre-Enrollment (Pre-Employment) Testing**

Prior to initial enrollment in the APCCP, applicants for employment and current contractor employees applying for membership in the APCCP must complete a pre-enrollment/pre-employment drug test. A verified positive test result or refusal to participate in the pre-enrollment/pre-employment testing process will result in denial of membership.

Under no circumstances may an individual enter or work within an owner’s facility until the following requirements are met:

- 1) The Contractor DER has completed and faxed the ‘APCCP Authorization & Consent/New Employee Membership Form’ to ASAP Drug Solutions, Inc. at the time the contractor applicant/employee is sent for testing.
- 2) The pre-enrollment test has been reported as negative and the individual has been given an ‘Active’ status.

A contractor applicant who is enrolled is immediately subject to selection for random testing. A contractor applicant who has completed an application at the contractor employer’s place of business and fails to report to the collection site within 48 hours of being instructed to do so shall be considered to have refused to consent to testing. The DER will notify ASAP Drug Solutions, Inc. using the ‘Refusal to Test’ form.

A contractor applicant who tests positive on a pre-enrollment/pre-employment test, or is otherwise classified ‘Inactive’ from a refusal to test (Section 7.1), shall be denied membership into the APCCP.

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## 5.2 Random Testing

- a) Random test rate of fifty percent (50%):  
 Fifty percent of the contractor employees shall be subject to drug and alcohol testing on an unannounced and random basis each calendar year. ASAP Drug Solutions, Inc. is responsible for random selection and notification.
- b) Random Selection Procedure
  - i) Contractor employees shall be selected for testing by using a computer-based random number generator that selects contractor employees' social security numbers or other appropriate identification numbers.
  - ii) Contractor employees remain in the random selection pool at all times, regardless of previous selection for testing. Each contractor employee will have an equal chance of being selected for testing. Random selection makes it possible for some contractor employees to be tested several times a year, and others not to be tested for several years.
- c) Notification of Contractor Employees
  - i) Upon receipt of the random selection list, the DER shall have twenty (20) calendar days to notify contractor employees of their selection.
  - ii) Contractor employees must report to a test collection site immediately upon notification.

A contractor applicant who is enrolled is immediately subject to selection for random testing. Any contractor employee who fails to submit to the testing within twenty (20) calendar days shall be designated 'Inactive-Retest'. A verified negative pre-access test is required before that individual regains 'Active' status. Such a pre-access test shall not be used to fulfill the 50% random test rate requirement.

A contractor employee who tests positive on a random test, or is otherwise classified 'Inactive' from a refusal to test (Section 7.1), shall be ineligible for entry onto owner sites

In addition to the 50% annual random test selections, Contractor Employee Members are also subject to an annual test requirement. At any point in time, individuals whose last random test date exceeds twelve months will be subject to a status of Inactive-Retest in the program. This additional test will be referred to an "annual test" and this test should not be credited toward any random testing program.

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### 5.3 Pre-Access Testing

A pre-access test is required for any contractor employee with an ‘Inactive-Retest’ status or to comply with a specific contractor employer’s or owner’s request for such a test.

A contractor employee who tests positive on a pre-access test, or is otherwise classified ‘Inactive’ from a refusal to test (Section 7.1), shall be ineligible for entry onto owner sites.

### 5.4 Reasonable Suspicion/For Cause Testing

Reasonable Suspicion/For Cause Testing is meant to identify contractor employees whose appearance, behavior, speech, or performance suggests probable drug use and/or alcohol misuse and who therefore, may pose a danger to themselves and others in the performance of their jobs. Reasonable suspicion testing will be based upon reasonably contemporaneous observations of the individual’s behavior or performance, or other indication that this policy may have been violated. Also, a supervisor with a concern triggered by an incident or series of incidents that has caused physical or other damage to the workplace or has resulted in a decline of efficiency or productivity may require the responsible contractor employee/s to be tested for probable drug use or alcohol misuse. Supervisors must decide whether there is reasonable cause to believe a contractor employee is using or has used a prohibited substance.

Indications of probable use of prohibited substances include, but are not limited to the following:

- a) Observed use of prohibited drugs or alcohol on owner premises;
- b) A pattern of abnormal conduct or erratic behavior such as unusual physical or verbal altercations with co-workers;
- c) Arrest for a substance related offense or illegal substance possession, use, or trafficking while on owner property;
- d) Specific information of an event or behavior provided and that is found to be credible;
- e) Being in the proximity to an area of drug-related paraphernalia, alcoholic beverages or substances prohibited by the APCCP policy;
- f) The occurrence of a serious or potentially serious incident that may have been caused by human error or by breach of established safety, security, or other operational procedures.

Requests for a for-cause testing should be made by two supervisors, the originator of the request and a corroborating supervisor. At least one of the supervisors must be trained in recognizing the attributes of drug use and alcohol misuse. The concurrence by both supervisors can be accomplished by phone.

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Supervisors making a for-cause determination and request for testing should proceed as follows:

1. Verify the reasonable cause decision, and if possible, review findings with another supervisor. Obtain the approval of contractor management or designee to proceed with the testing.
2. Isolate and inform the contractor employee.
3. Promptly transport and escort the contractor employee to the collection site for testing.
4. Within 24 hours of the observed behavior or before the results of the tests are released, whichever occurs first, document the events of the case. (Appendix 5)
5. Make arrangements for the contractor employee’s safe transport home following collection. Based on the reasonable belief that the contractor employee’s ability to operate a vehicle may be impaired, instruct the contractor employee not to drive.
6. The contractor employee shall be removed from owner sites pending drug and alcohol test results. After submitting to testing, the contractor employee will have an ‘Inactive Pending’ status pending test results.

An individual who tests positive on a reasonable suspicion/for cause test, or is otherwise classified ‘Inactive’ from a refusal to test (Section 7.1), shall be ineligible for entry onto owner sites.

**5.5 Owner Initiated, Wall-to-Wall, or Unit Testing**

Contractor employees on owner premises are subject to unannounced enmasse testing for substances listed in Appendix 2. Such tests are scheduled at the discretion of the owner. Testing shall be administered to all members of a specific group on site at the time. Such groups may include, but are not limited to, all contractor employees on site, or contractor employees identified by shift, crew, location, craft, contractor, or by any other category.

Upon notification of such testing, contractor employees shall immediately proceed to the designated collection site or transportation vehicle that will transport them to the collection site. Any contractor employee in the named group who has entered the owner’s facility, or started his/her work shift, and who leaves after being notified or refuses to be tested, shall be reported as a ‘refusal to test.’

Collection and testing protocols of wall-to-wall tests will be processed as any other test within the policy. The test results will be reported to the owner’s designated representative and the contractor employee’s current employer.

An individual who tests positive on an owner initiated or wall-to-wall test or is otherwise classified ‘Inactive’ from a refusal to test (Section 7.1), shall be ineligible for entry onto owner sites.

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## 5.6 Post-Accident/Incident Testing

If there is a reasonable possibility that drug and/or alcohol use may have been a contributing factor to an accident, contractor employees must submit to post-accident/incident testing for any of the following reasons:

- a) The contractor employee is involved either in a work-related accident that results in one or more recordable injuries, as defined by the Occupational Safety and Health Administration (OSHA), or an incident that causes damage to the environment or to an owner’s property, or both; or
- b) The contractor employee is involved in an incident (including near misses) in which safety rules and regulations may have been violated.

After an accident/incident, the contractor representative or owner representative shall make the determination to test. After submitting to testing, the contractor employee will have an ‘Active’ status pending test results. However, access may be restricted at the participating owner’s site.

Post-accident/incident tests shall be conducted immediately or as soon as reasonably possible, after an accident or incident occurring on owner sites. The requirement for substance testing following an accident shall not delay necessary medical attention for the injury. Only employees whose acts could have caused or contributed to the accident will be tested unless otherwise required by applicable federal, state, and/or local law. All such tests will be conducted as soon as possible after the company learns of the accident but after any necessary emergency assistance has been provided. Drug/alcohol testing under this section will be applied in a neutral fashion, to foster a safe work environment, and will only be undertaken to identify drug/alcohol use in the recent past. Testing under this section will not be undertaken to retaliate against contractor employees for reporting workplace injuries.

Any contractor employee involved in an accident must refrain from alcohol consumption for eight hours following the accident or until a post-accident alcohol test can be administered, whichever occurs first.

In the event that the test cannot be conducted in the aforementioned time period because the individual has been removed from the owner’s site or is unable to be transported to the collection site, the DER shall call ASAP Drug Solutions, Inc. immediately so that a collector can be dispatched promptly for on-site collection. If a post-accident/incident test is not performed within 32 hours of the accident, the DER shall provide ASAP Drug Solutions, Inc. with a written explanation for the missed test. Such explanation shall be made available to the owner’s representative upon request.

If a required post-accident/incident test was performed by state or local law enforcement authorities instead of ASAP Drug Solutions, Inc., results may be obtained and used in accordance with applicable laws.

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An individual who tests positive on a post-accident/incident test, or is otherwise classified ‘Inactive’ from a refusal to test (Section 7.1), shall be ineligible for entry onto owner sites.

**5.7 Other**

When a contractor employee is tested for reasons other than those spelled out in the above provisions of this policy, ASAP Drug Solutions, Inc. will report the test as ‘Other’. Such reasons may include testing of an ‘Active’ APCCP consortium member who has been required to take a pre-employment test by a contractor company prior to being hired or a post-accident/incident test in which the authorization form does not indicate the reason for the test.

In all cases, a test reported as ‘other’ shall have been conducted in accordance with APCCP procedures. Such tests shall be considered valid tests under this policy.

CONSEQUENCES OF TESTING POSITIVE OR REFUSING TO TEST –  
 Compliance with the APCCP Policy is a condition of entry onto owner sites. Any individual who tests positive on a test or is otherwise classified as ‘Inactive’ from a ‘Refusal to Test’ (Section 7.1), is not eligible for entry onto owner sites.

**6.0 PROBLEMS IN DRUG TESTING**

**6.1 Refusal to Test**

Any contractor applicant or employee who refuses to submit to testing shall be designated ‘Inactive’ and be ineligible for entry onto owner sites.

Any of the following shall constitute a ‘refusal to test’:

- a. Failure to report for testing, within a reasonable time after notification, as determined by the DER, after being directed to do so. For pre-access and random testing, the contractor employee must report for testing immediately;
- b. Failure to remain at the testing site until the testing process is complete;
- c. Failure to provide a specimen for any test required under this policy;
- d. Failure to permit a directly observed or monitored collection, if required and allowed under applicable federal, state, or local law;
- e. Failure or declining to take a second test when directed by the DER or collector;
- f. Failure to provide a sufficient amount of specimen (e.g., urine or saliva) when directed, unless it has been determined, through a medical evaluation, that there was an adequate medical explanation for the failure;
- g. Failure to undergo medical examination or evaluation for the inability to provide an adequate specimen, or a claim of a legitimate medical explanation in a validity testing situation, as directed by the MRO or medical examiner in the verification process;

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- h. Failure to cooperate with any part of the testing process (e.g. refusing to empty pockets when directed, or disrupting the collection process);
- i. If the MRO verifies that the test specimen has been adulterated or substituted;

When a contractor employee refuses to participate in the part of the testing process in which:

- the DER is involved—the DER documents this on the ‘Refusal to Test’ form and notifies ASAP Drug Solutions, Inc.;
- the collector is involved—the collector documents this refusal in the custody and control form, and notifies the DER and ASAP Drug Solutions, Inc.;
- the physician performing the ‘shy bladder’ condition is involved—the physician notifies the MRO who will notify the DER and ASAP Drug Solutions, Inc.

Notification of refusal should be done immediately by telephone followed by secure fax.

**6.2 Procedures in Insufficient Amount of Urine for a Drug Test**

When the contractor applicant or employee provides an insufficient volume of urine (less than 30 ml.) for a single-specimen urinalysis drug test, ‘shy bladder’ procedures (in accordance with 49 CFR Part 40 §193) will be initiated by the collection site. The individual will be asked to drink up to 40 oz. of fluid over a three-hour period. The individual must remain at the collection site and will be monitored during this waiting time. Refusing to attempt to provide a new urine specimen or leaving the collection site before the collection is complete constitutes a refusal to test. If the individual is unable to provide a sufficient specimen after three (3) hours, the DER shall be notified and the individual will be asked to obtain, within five (5) working days, an evaluation from a licensed physician, acceptable to the MRO, for failure to provide a sufficient specimen. If no valid medical reason is determined for the inability to provide a sufficient amount of urine, the individual is deemed to have refused to test.

**6.3 Procedures in Inability to Provide Enough Saliva or Breath to Permit a Valid Alcohol Test**

When the contractor applicant or employee is unable to provide a sufficient saliva or breath specimen after at least two (2) attempts, the DER will be notified. The individual will be asked to obtain, within five (5) working days, an evaluation from a licensed physician, acceptable to ASAP Drug Solutions, Inc., concerning his/her inability to provide enough saliva or breath. If no valid medical reason is determined, the individual is deemed to have refused to test.

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**6.4 Directly Observed Urine Collections**

A directly observed urine collection, in which the observer (witness) is in the bathroom while the individual urinates, shall be conducted, where allowed by applicable federal, state, or local law, if:

- A urine specimen is provided that was out of temperature range;
- Action is observed indicating an attempt to tamper with the specimen at the collection site;
- The specimen appears to have been tampered with;
- The MRO instructs the DER to send the individual in for an observed collection.

Declining an observed collection when it is required or permitted is considered a refusal to test.

**6.5 Dilute Specimens**

A contractor employee with a reported negative dilute test will be subject to one additional retest. A positive dilute test result will be considered a positive test. The DER, upon notification of the ‘dilute’ negative result, will direct the employee to retest. The contractor employee must immediately proceed to the designated collection site for collection of a second specimen. A positive test result from this retest, or ‘refusal to test’ will result classified as ‘Inactive’ from a ‘Refusal to Test’ (Section 7.1), is not eligible for entry onto owner sites. The second test (recollection), if performed, becomes the test of record for all purposes.

For pre-enrollment testing, the contractor applicant’s status remains ‘Not-on-file’ until results of the retest have been verified by the MRO. For all other tests, the contractor employee’s status remains ‘Active’ based on the initial negative, pending results of the retest.

**6.6 Re-analysis (Retest of the Original Drug Test Specimen)**

A contractor employee may make a request in writing to the MRO for a retest of his/her original specimen, within two (2) weeks of being notified of a positive drug test or refusal to test because of adulteration or substitution. The retest may be performed by the same or a second laboratory selected by the employee from a list provided by the MRO of at least two other DHHS-certified laboratories. The contractor employee’s status remains ‘Inactive’ until results of the retest have been reported. Depending on contractor company policy, the contractor employee must pay for the retest.

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## 6.7 Alternate Specimens

Alternate specimens are authorized when:

- (i) An employee has
  - A legitimate medical explanation for, or a permanent medical condition resulting in, an inability to provide a urine specimen for drug testing, or a breath sample for evidential breath testing.
  - Two consecutive invalid test results for the same reason, with the second test collected under direct observation.
  
- (ii) The MRO has determined that an alternate specimen test is indicated.

Hair testing following chain-of-custody procedures is the recommended alternate specimen for drug testing. On a case by case basis, oral fluid drug testing is authorized.

Blood collection, following chain-of-custody procedures is the recommended alternate specimen for alcohol testing.

Declining an alternate specimen collection when it is required or permitted is considered a 'refusal to test'.

Payment for the evaluation will be borne by the Contractor company unless his/her employer's drug policy specifies otherwise.

## 7.0 OTHER APCCP PROGRAM PROCEDURES

### 7.1 Drug or Alcohol Test Not Completed

In the APCCP Policy, tests consist of both an alcohol and a drug test, excluding pre-employment and pre-access testing. In the event that a test or any part of a test is not completed, the contractor employee has 72 hours from the time of the original test to complete the test. A contractor employee failing to complete the test within 72 hours must retake both a drug and an alcohol test.

### 7.2 Multiple Positive Tests within a 48-Hour Period

Regardless of the number of drug and alcohol tests administered to a contractor employee within a 48-hour period, repeated positives for the same substance will be considered a single positive. The contractor employee will be designated 'Inactive' and will be ineligible to enter owners' sites.

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### 7.3 Responsibilities

**7.3.1 ASAP Drug Solutions, Inc.**, as the service agent, has the responsibility of administering the APCCP Drug and Alcohol Program. Its functions include, but are not limited to:

- Operating the random testing program;
- Assisting with all other testing functions through contracting with collection sites, laboratories, MROs, and SAPs; and
- Maintaining the APCCP database and providing drug and alcohol test information/statistics to owners and contractor employers.

#### 7.3.2 Contractor Company – Designated Employer Representative (DER)

Participating contractor companies are responsible for assigning at least one responsible contractor employee, the designated employer representative (DER), to act on behalf of the contractor in all matters related to this policy.

DER duties include but are not limited to the following:

1. Implementing and enforcing the APCCP Drug and Alcohol Policy for the contractor company.
2. Educating contractor employees about the APCCP Drug and Alcohol Policy, providing them with a copy or a summary of the policy, and making available a copy for review at the contractor company.
3. Enrolling new contractor employees and submitting the 'Authorization & Consent/New Employee Membership Form' before the contractor employee is tested.
4. Sending contractor employees for testing with the completed and signed authorization and appropriate chain-of-custody and alcohol forms.
5. Receiving test information and instructing the contractor employee to contact the MRO, if the MRO has determined that an interview is required.
6. Ensuring that contractor employees who have tested positive on a drug test and/or tested with an alcohol concentration of 0.01 or higher, or refused to be tested, do not enter or perform work on owner sites
7. Maintaining contractor pool membership by regularly 'activating' and 'deactivating' employees.
8. Submitting the 'Refusal to Test' forms when a contractor applicant or employee has 'refused to test.' (Section 7.1)
9. Ensuring that all company information provided to ASAP Drug Solutions, Inc. is correct and current.
10. Maintaining confidentiality and security of employee records.
11. Ensuring that a secure fax is available for the receipt of confidential data.
12. Maintaining efficient communication by having e-mail capabilities.

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**8.0 DRUG AND ALCOHOL TESTING PROCEDURES**

Collection site and clinical laboratory personnel shall maintain the confidentiality of drug testing information and chain-of-custody documentation. They shall also protect the security and integrity of test specimens. All procedures involved in the collection, handling, and testing of the specimens will mirror Federal Mandatory Guidelines (49 C.F.R. Part 40) where applicable, unless otherwise specified in this policy. Such guidelines provide for collections under direct observation and monitored collections under certain circumstances.

**8.1 Collection Site**

Urine collections and alcohol tests will be conducted at facilities provided by the owners, ASAP Drug Solutions, Inc., or at third party collection sites which have been contracted by ASAP Drug Solutions, Inc. All urine collections and alcohol testing will be conducted by trained personnel using Department of Transportation (DOT) protocol from 49 CFR Part 40 and in accordance with this policy.

**8.1.1** The protocol for urine collections shall conform to the split urine specimen collection protocol (49 CFR Part 40).

**8.1.2** The protocol for alcohol testing shall conform to 49 CFR Part 40 – (Appendix 4.)

**8.2 Drug Testing Laboratory**

Analysis of test will be performed by laboratories with both a Substance Abuse and Mental Health Services Administration, United States Department of Health and Human Services (SAMHSA/DHHS) and a College of American Pathologists: Forensic Urine Drug Testing certification/accreditation and according to the requirements of such certification/accreditations. The laboratory reports all drug test results to the MRO.

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**9.0 MEDICAL REVIEW OFFICER AND THE VERIFICATION PROCESS**

The Medical Review Officer (MRO) is responsible for reviewing and interpreting all drug test results; and shall determine whether there is a legitimate medical explanation for each confirmed positive, adulterated, substituted, or invalid drug test result from the laboratory.

Unless otherwise specified, MRO procedures for verification of test results under the APCCP Policy will mirror Department of Transportation procedures.

**Verification procedure and contractor employee status:**

Upon receiving a report from the laboratory indicating a non-negative test result, the MRO will notify the DER of the need to contact the donor (contractor employee). Test results will not be discussed with the DER prior to the MRO verification interview. During the verification process, the contractor employee shall be designated ‘Inactive-Pending’. Neither the verification process nor the status shall imply use of illegal drugs.

The DER is responsible for removing the contractor employee from the work-site and having him/her immediately contact the MRO, using procedures that protect, as much as possible, the confidentiality of the MRO’s request and interview. If the MRO verifies a negative result, the contractor employee will be designated ‘Active’ and be able to return to the work-site. If additional information is needed, the employee’s status remains ‘Inactive-Pending’ pending final verification by the MRO. If the test is verified as positive, the contractor employee will be designated ‘Inactive’.

Test results may be verified by the MRO without an interview when:

1. The contractor employee refuses to discuss the test results with the MRO,
2. More than 72 hours have passed since the DER has contacted and notified the contractor employee of the need to contact the MRO, or
3. The DER has not been able to contact the contractor employee for five (5) days in spite of reasonable and documented efforts to do so.

**MRO’s reporting of test results:**

The MRO shall report all test results through ASAP Drug Solutions, Inc., acting as an intermediary. In addition, the MRO shall report verified positive test results, ‘refusal to test’, and other non-negative test determinations to both the Company DER and ASAP Drug Solutions, Inc.

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**10.0 RECORDKEEPING PROCEDURES AND RELEASE OF INFORMATION**

**10.1 Record Retention**

**Records in hard-copy format**

The following records shall be kept for at least five (5) years:

- i) Drug test records with a positive test result or ‘refusal to test’ determination.
- ii) Alcohol test records with alcohol concentration of 0.01 or higher.

The following records shall be kept for at least one (1) year:

- i) Drug test records with a negative test result.
- ii) Alcohol test records with alcohol concentration of less than 0.01.

**Records in electronic format:**

Results of all tests shall be stored in electronic format for at least seven (7) years. Records shall be archived in non-rewritable format. The database remains the property of ASAP Drug Solutions, Inc.

**10.2 General Confidentiality Rules**

ASAP Drug Solutions, Inc. and the DER shall ensure that all test records remain confidential and that measures have been established to assure confidentiality during transmission and storage of test records, and security in electronic databases. The DER must provide a secure fax number to which confidential test results can be sent.

Test results of contractor applicants and employees will be disclosed only to the DER of the contractor employer under which the individual tested. The statuses, but not the individual test results of a contractor employee, are made available to DERs of other contractor members of the APCCP and to designated owner representatives for verification of eligibility to work, according to the provisions of the APCCP program.

Information regarding individual test results or rehabilitation records will be released only upon the written consent of the individual or, regardless of consent, to the representative/s of any local, state or federal agency with regulatory authority; upon request by subpoena; or other legal process such as a court order. The confidentiality provisions of this section are waived if compelled by legal proceedings (e.g., grievance, arbitration or other civil or criminal administrative proceeding, lawsuit, etc.) brought by or on behalf of an individual, involving a status or the results of a test.

Statistical data of the APCCP, which contain no individual identifying information, as well as anti-drug plans or policies related to drug testing and rehabilitation under the APCCP policy, will be made available to APC for the purpose of auditing compliance and effectiveness of this policy. APC, at their discretion, may make

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APCCP statistical data that do not contain personal identifying information available to other production plant owners.

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**11.0 EDUCATION AND TRAINING**

**11.1 Designated Employer Representative (DER) Training**

The DER should schedule DER Training through ASAP Drug Solutions, Inc. DER training records (including name, date of training) will be maintained by ASAP Drug Solutions, Inc. and the contractor.

**11.2 Supervisor Training**

Each participating contractor shall provide supervisor training regarding this policy. Training of supervisors on the recognition of performance indicators of probable drug use and the effects and consequences of substance abuse to personal health, safety, and the workplace shall be included. It is required that each contractor company supervisor making reasonable cause determinations, receive at least sixty (60) minutes of training on the specific, contemporaneous, physical, behavioral and performance indicators of probable drug and alcohol use. Records of supervisors trained (including name, date, instructor, and training content) shall be maintained by the contractor.

**11.3 Contractor Employee Training**

Upon initial entry to the APCCP Consortium, contractor companies shall review with each contractor employee this policy and any additional substance abuse policy requirements of the particular work site. Documentation of the review shall be maintained.

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**12.0 PROGRAM REVIEW, AUDIT, OWNERSHIP, AND LEGAL COMPLIANCE**

This program may be modified at any time. Contractors shall be notified of any modification before implementation.

The policies, procedures, and protocols of ASAP Drug Solutions, Inc. and records, without individual identifying information, are available for confidential audit by APCCP, and contractors. The APCCP Policy and drug and alcohol testing program database remain the property of APCCP.

The APCCP will be administered in compliance with all applicable state, local, and federal laws. The APCCP program document is intended to comply with all applicable laws. In the event of a nonconformity with applicable law, the APCCP program shall be deemed to be reformed to comply with the applicable legal requirement.

**13.0 COSTS**

**13.1 Contractor Employer Costs**

Contractors will be responsible for the following charges:

- Annual data management.
- Contractors must submit the employer information sheet, company member agreement, and pay the annual membership fee prior to establishing an account with ASAP Drug Solutions. If a Contractor cancels membership before the year is up and then decides to become a member again, a re-activation/annual processing fee will be charged.
- Contractor employee set-up.
- Specimen collection.
- Drug and alcohol testing and administration.
- Direct costs associated with testing which arise from the contractor employer/employee relationship (e.g., wages, travel expenses, etc.).

Contractors may recover the following costs from the individual depending on the contractor company’s drug and alcohol policy:

- Re-analysis of the test specimen for drugs.
- Additional examinations or studies by a MRO-approved referral physician to determine whether a legitimate medical explanation exists for the inability to provide a saliva, breath, or a urine sample; or test results involving adulteration or substitution.

**13.2 Contractor Employee Costs – Re-analysis and**

Contractor employees will be responsible for costs associated with re-analysis when conducted at the contractor employee’s request.

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**Appendix 1: General Definitions of Terms in Drug and Alcohol Testing**

**Canceled Test** – A drug or alcohol test that has a problem identified that cannot or has not been corrected. A canceled test is neither a positive nor a negative test.

**Collection site** – A place designated by the employer where individuals present themselves for the purpose of providing a urine specimen for a drug test.

**Collector** – A person who instructs and assists individuals at a collection site and who receives and makes an initial inspection of the urine specimen provided by those individuals, and who initiates and completes the CCF.

**Confirmation (or confirmatory) Test** – In drug testing, a second analytical procedure to identify and quantify the presence of a specific drug or metabolite. In alcohol testing, a second test following a screening test with a result of 0.01 or higher that provides quantitative data of alcohol concentration.

**Custody and Control Form (CCF)** – Procedures to account for the integrity of each urine or blood specimen by tracking its handling and storage from point of specimen collection to final disposition of the specimen. With respect to drug testing, these procedures shall require that an appropriate drug testing custody form (CCF) be used from time of collection to receipt by the laboratory and that upon receipt by the laboratory, an appropriate laboratory chain of custody form account(s) for the sample within the laboratory.

**Dilute specimen** – A specimen with creatinine and specific gravity values that are lower than expected for human urine.

**Donor** – An employee or job applicant who provides a specimen for drug and alcohol testing.

**EBT (or Evidential Breath Testing Device)** – A device approved by the National Highway Traffic Safety Administration (NTSA) for the evidential testing of breath at the 0.01 alcohol concentrations.

**Medical Review Officer (MRO)** – A licensed physician who is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program; and evaluating medical explanations for drug test results.

**Specimen** – In drug testing, urine that has been provided by a donor for a drug test. The entire sample is contained in a single specimen bottle.

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**Appendix 2: Drug and Alcohol Panel**

Type of Drug or Metabolite	Initial test [EMIT](ng/mL)	Confirmation test [GC/MS](ng/mL)
Amphetamines:	300	
Amphetamine		250
Methamphetamine		250
MDMA		250
MDA		250
MDEA		250
Barbiturates	300	100
Benzodiazepines	300	100
Cocaine metabolites	150	100
Opiates:	300	
Morphine		100
Codeine		100
Hydromorphone		100
Hydrocodone		100
Oxycodone		100
Oxymorphone		100
6-acetylmorphine (6-AM) – 10ng/mL only when the specimen contains morphine at a concentration greater than or equal to 2000 ng/mL		
Marijuana metabolites	20	10
Phencyclidine (PCP)	25	25
Methadone	300	100
Methaqualone	300	200
Propoxyphene	300	200
Alcohol	.01% (alcohol screening device ASD or EBT)	.01% (evidential breath testing device EBT)
A confirmed alcohol concentration of <b>0.01 or higher</b> is a positive test. The employee must be immediately removed from owner sites,		

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**Appendix 3: Steps for Conducting Reasonable Suspicion/For Cause Evaluations and Testing**

If a contractor employee appears intoxicated or under the influence of drugs or alcohol, take the following steps:

- 1) Remove the contractor employee from the work assignment. If there was an accident, treat injuries first.
- 2) Secure management witness, if possible. If bargaining unit is represented, a steward may be notified.
- 3) Observe behavior and look for physical and mental signs of drug abuse.
- 4) Ask the contractor employee for an explanation of the behavior/signs.
- 5) Determine if there is the possibility of a medical emergency. When in doubt, call a medic or ambulance. (Medication reactions and physical illness may mimic signs of impairment and intoxication.).
- 6) If there are facts, physical signs, symptoms, and a pattern of behavior that would lead a trained supervisor to reasonably suspect that the condition may be caused by a prohibited substance, request a SUBSTANCE TEST. The next level supervisor should authorize the test.
- 7) Accompany the contractor employee to the drug test collection site. Continue to observe the contractor employee, making sure that he/she is not experiencing any other reactions. Do not let the contractor employee drive home.
- 8) DOCUMENT your observations as soon as possible. Be objective, factual and specific. Have a witness collaborate findings, if possible.
- 9) Treat the incident discretely and confidentially. Information should be given only on a need-to-know basis. Implement the program uniformly.

I have read the above policy and understand the procedures and conditions associated with Anadarko Petroleum Company

Employee printed name: \_\_\_\_\_

Employee signature \_\_\_\_\_

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
 Date

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