

## **POLICY**

E & B Oilfield Services, Inc. has adopted this policy for Subcontractor Management from industry standards and best practices.

## **RESPONSIBILITIES**

Danny Abegglen is the assigned Company Supervisor responsible for ensuring the following procedures, practices, and rules are implemented and enforced.

## **PROCEDURES**

### **Prequalification**

Danny Abegglen will ensure that all prospective subcontractors be pre-qualified through the review of their safety programs, safety training documents, and safety statistics. Proposed subcontractors will complete and submit a Contractors Prequalification Form from which a Subcontractor/Supplier Quality Rating Report will be completed. The Contractor's Prequalification Form must be complete and all requested attachments provided.

### **Selection**

Danny Abegglen will utilize acceptable safety matrixes to be used as a criteria for selecting subcontractors and will be based upon several considerations including but not limited to:

- Prior working relationships
- Quality Rating Report scores such as: TRIR, EMR, DART
- Audits of current work in progress
- Availability of contractors in the area

The contractor that receives the best overall review will be forwarded to the Owner's representative for review and approval.

### **Pre-Job**

The selected subcontractor will provide a training matrix with individual employee names and the areas of completed training for employees. The subcontractor will also identify Competent Persons and the areas of their competency. The subcontractor will be included in pre-job meetings or kick-off meetings, and safety orientations.

### **On-Site**

The subcontractor will notify E & B Oilfield Services, Inc. Site Safety a minimum of 24 hours prior to the arrival of new employees on-site so that arrangements can be made to provide the required orientations. Employees must meet all of the requirements of the Site Safety Plan, including the training and orientation.

The Subcontractor will be required to meet all hazard analysis requirements and request the safe work permits as required by this plan. The subcontractor will be included in the audits and inspections on-site and are expected to immediately correct any "At Risk" behaviors or hazards identified that are within the subcontractor's scope of work and ability to correct. Employees of subcontractors have the right to refuse any work they deem to be hazardous.

All subcontractors will be included in tailgate safety meetings, job safety analysis or hazard assessments, and on-the-job safety inspections.

The subcontractor will be required to adjust their "Safe Work Practices" in order to prevent excessive Near Hits and/or Near Misses. If the subcontractor is unable to perform their scope of work without "At Risk" behavior or creating hazardous working conditions on the site, the subcontractor's working element will be required to leave the site until an abatement plan can be prepared and agreed upon.

### **Post-Contract**

Upon completion of the work, a post-job subcontractor safety performance review and evaluation will be completed to determine the safety performance of the subcontractor and provide reference for future job consideration.

### Management of Change

E & B Oilfield Services, Inc. will conduct a hazard assessment when a change occurs in the construction plan or external influences impact the manner in which the work will be conducted. This includes, but is not limited to:

- Changes in policy or objectives
- Operating licenses and permits, legal, and regulatory requirements
- Changes in procedures, practices, and rules
- Changes to controlled documentation
- Work processes or methods
- Any change other than exact replacement in kind to equipment, processes, hardware, or software
- Changes to operating boundaries; e.g. operating envelopes
- Temporary changes that specify the period of time a change will be in effect

The management of change process covers all activities including the initial request, implementation, review, and closure of a change. Proposed changes will be managed by Danny Abegglen and forwarded to the Owner's management for approval or disapproval.

The following items will be included in the management of change proposal:

- Technical basis for the change
- Impact of the change on the health and safety of personnel
- Impact of change on the supplied tools and equipment
- Necessary modifications to existing or new operating procedures
- Methodology used to analyze the impact of the change



**OPEN LETTER TO ALL SUBCONTRACTORS**

Date: \_\_\_\_\_

Greetings Prospective Subcontractor:

As part of E & B Oilfield Services, Inc.'s continuing commitment to safety, we are assessing our potential subcontractors' compliance with all applicable safety requirements. Enclosed are the materials you will need to complete this process, including a questionnaire that will assist us in assessing your safety programs. We are asking all subcontractors "Invited to Bid" to complete the attached questionnaire. The matrix included in this package is designed to assist you in determining which programs are applicable to your operations.

Please contact me \_\_\_\_\_ or \_\_\_\_\_ with any questions or concerns.

I am in and out of the office so please leave me a voice mail and I will get back to you when I return.

Please forward the completed forms and attach a copy of your safety manual by: \_\_\_\_\_

TO:

Company \_\_\_\_\_

Attn: \_\_\_\_\_

Address \_\_\_\_\_

City/State/Zip \_\_\_\_\_

Phone \_\_\_\_\_

Fax \_\_\_\_\_

Email \_\_\_\_\_

Regards,

\_\_\_\_\_  
Construction Manager



**SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 1 OF 4)**

Company Name		Number of Employees		Date	
Address					
City		State		ZIP	
Telephone #	( )	Fax #		( )	
Form Completed By					
Officer Name and Signature					
Please describe the services that your Company provides					
				YES	NO
1. Has your Company received any inspections from a regulatory agency in the last three (3) years?				<input type="checkbox"/>	<input type="checkbox"/>
If yes, provide details					
2. Has your Company received any citations from a regulatory agency during the last three (3) years?				<input type="checkbox"/>	<input type="checkbox"/>
3. Does your Company have regularly scheduled, documented employee safety meetings? (Tailgate/Toolbox)				<input type="checkbox"/>	<input type="checkbox"/>
If yes, how often					
What is covered at safety meetings?					
4. Does your Company perform equipment checks on all equipment?				<input type="checkbox"/>	<input type="checkbox"/>
If yes, are records maintained?				<input type="checkbox"/>	<input type="checkbox"/>
5. Does your Company perform Job Hazard Analysis (JHA)?				<input type="checkbox"/>	<input type="checkbox"/>





**SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 2 OF 4)**

6. Does your Company provide and require employees to use the following Personal Protective Equipment (PPE)?						
Hard Hats				<input type="checkbox"/>	<input type="checkbox"/>	
Safety Shoes/Boots				<input type="checkbox"/>	<input type="checkbox"/>	
Eye and Face Protection				<input type="checkbox"/>	<input type="checkbox"/>	
Hand Protection				<input type="checkbox"/>	<input type="checkbox"/>	
Hearing Protection				<input type="checkbox"/>	<input type="checkbox"/>	
Fall Protection				<input type="checkbox"/>	<input type="checkbox"/>	
Respiratory Protection				<input type="checkbox"/>	<input type="checkbox"/>	
7. In addition to regulatory required Personal Protective Equipment, what other PPE is required or supplied?						
If any, please list						
8. Indicate the circumstances in which your Company's employees may be subject to alcohol/drug screening						
<input type="checkbox"/>	Never	<input type="checkbox"/>	Reasonable Cause/ Suspicion	<input type="checkbox"/>	Periodic	
<input type="checkbox"/>	Random	<input type="checkbox"/>	Post-Accident	<input type="checkbox"/>	Follow-Up	
<input type="checkbox"/>	Return to Duty	<input type="checkbox"/>	Other			
Do you have a documented Substance Abuse Prevention Program available for review?					<input type="checkbox"/>	<input type="checkbox"/>
9. Does your Company have a policy requiring written accident/incident reports (injuries, property damage, etc.)?					<input type="checkbox"/>	<input type="checkbox"/>
10. Does your Company document, investigate, and discuss "Near Miss Incidents"?					<input type="checkbox"/>	<input type="checkbox"/>



**SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 3 OF 4)**

11. Please respond to all items below with YES, NO, or N/A (not applicable). Do not leave any items unanswered.				
OSHA Programs/Training	Program Written and Documented?	Training Conducted By (In-House or Outsourced)	Frequency of Employee Training	Documented Individual Employee Training?
OSHA Programs				
Confined Spaces				
Electrical Safety (qualified)				
Electrical Safety (non-qualified)				
Excavation and Shoring				
Fire Protection and Prevention				
Fall Protection				
First Aid/CPR				
HAZCOM				
Heat Stress Prevention				
Lifting/Mobile Equipment				
Lockout/Tagout				
Noise/Hearing Conservation				
PPE				
Respiratory				
Scaffolds/Ladders				
Trenching/Shoring				
Welding, Cutting, and Hot Work				



**SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 4 OF 4)**

12. Please provide any additional information on other industry-specific programs or training, including written procedures, which your Company provides to employees	
13. Does your Company have a Safety and Health Program with clearly written safety policy that is endorsed and enforced by upper management?	<input type="checkbox"/> <input type="checkbox"/>
14. Does your Company perform documented safety audits/reviews?	<input type="checkbox"/> <input type="checkbox"/>
15. Who in your Company is responsible for coordinating your health, safety, and environmental program?	
16. If your Company has more than ten (10) employees, please attach with this questionnaire your Company's OSHA 300 Log for the last three (3) years.	
17. Does your Company use subcontractors?	<input type="checkbox"/> <input type="checkbox"/>
If yes, explain	
Are your Subcontractor's written safety programs and procedures available for review?	<input type="checkbox"/> <input type="checkbox"/>
18. Are all documents and records pertaining to this questionnaire available for audit?	<input type="checkbox"/> <input type="checkbox"/>
If no, explain	
19. Please attach your current/completed Health and Safety Program along with other written safety programs for review. A disk or CD-ROM is acceptable.	
Comments	



**SAFETY CONTRACT**

Following are Safety Requirements as stated in your subcontract agreement: Subcontractor agrees to comply with prevailing safety regulations, whether OSHA, Contractor Policies, Owner Policies, or otherwise imposed while working on the project. Subcontractor also agrees to be bound by any rule or regulation needed during the course of the project. Subcontractor further agrees:

- To provide a safe work area to all his employees by providing, and requiring the use of, the required Personal Protective Equipment such as: hard hats, safety glasses, respirators, dust masks, face shields, etc.
- Subcontractor's employees shall wear long or short sleeve shirts, long pants, and sturdy work shoes, boots, or when required, steel-toed boots
- To provide this Contractor with proper documentation on employee training for specific tools and equipment such as powder actuated tools, air guns (nail guns), forklifts, scaffolding, scissors lifts, boom lifts, and any safety plan applicable to their scope of work
- Be responsible for implementing and administering their safety program and must provide a copy of said program to this Contractor including a Job Hazard Analysis (inspections) and documentation on weekly job site safety meetings with its employees
- To implement daily hazard recognition for its employees by using a Pre-Task Planner form for their daily scope of work
- To provide its employees with safe tools and equipment and to safely perform the work under this agreement with high regard for the safety of its employees and others
- To provide a designated person for a weekly contractor safety coordination meeting

Subcontractor shall:

- Immediately report to this Contractor in writing and remedy any accidents/illness, near misses, or unsafe conditions brought to its attention or discovered by subcontractor employees, involving its work and/or posing a danger to persons or property
- Not permit its employees at the project to use publicly audible radios or to wear headsets except as are used for job site communications
- Prior to bringing on site a substance or material for which a Safety Data Sheet (SDS) is required by federal, state, and local regulations, subcontractor shall provide said SDS to Contractor

This Contractor is a Drug-free Company and provides such a workplace for its employees.

Subcontractor shall provide this Contractor, prior to beginning scope of work, with current documentation of subcontractor's drug testing policy or program (i.e. pre-hire and random testing). The subcontractor will conduct random drug testing for all of their employees throughout the course of the project. All subcontractors' employees shall attend a Project Safety Orientation on the first day of work on the job site.

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Subcontractor Name

Signature

Title

Date

