



CONFINED SPACES

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Purpose

This program outlines how Validus Energy will meet the requirements outlined in OSHA's **Permit Required Confined Space** standard. (1910.146)

Scope

This program applies to all worksites operated by Validus Energy.

Process

Validus Energy employees shall not enter any permit-required confined spaces.

Note: Supervisors may enter a previously designated permit-required space for inspection if the space has been reclassified as a **non-permit space** using the permit space reclassification form found on the forms page of Validus.Energy.

Only approved contractors may conduct permit-required space entry.

Contractors must have a program that meets the requirements of 1910.146 and fully complete a permit prior to entering the space.

A rescue team must be present for the duration of the permit-required confined space entry.

Following the work, a copy of the completed permit must be sent to EHS@validus-energy.com.

Responsibilities

Leadership	Commit to, follow, and reinforce the requirements set forth in this program. Provide sufficient resources for implementation.
Supervisors	Ensure Validus employees have the knowledge and skills to follow this program. Ensure no Validus Energy employee enters a permit-required confined space.
EHS	Provide guidance on confined spaces and acceptable entry conditions. Monitor compliance with this program through an audit process.
Validus Employees	Complete training and adhere to the requirements set forth in this program. Do not attempt to enter a permit-required confined space.



Definitions

Acceptable Entry Conditions- the conditions that must exist in a Confined Space to allow Entry and to ensure that Workers involved with a **Confined Space** Entry can safely enter, and work, within the space.

Confined Space(s):

- A space that is large enough and so configured that Workers can enter and perform assigned work.
- Has limited or restricted means for Entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of Entry), and
- Is not designed for continuous occupancy.

Engulfing- the surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

Entry- the action by which a person passes through an opening into a Confined Space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the Entrant's body breaks the plane of an opening into the space.

Hazardous Atmosphere- an atmosphere that may expose Workers to the risk of death, incapacitation, and impairment of ability to self-rescue (that is, escape unaided from a Confined Space), injury, or acute illness from one or more of the following causes:

- Flammable gas, vapor, or mist more than 10 percent of its lower flammable limit (LFL), (0% is normal).
- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent, (20.9 % is normal).
- Any other atmospheric condition that is Immediately Dangerous to Life or Health. (Ex.- H2S 10%, 0% is normal).
- Note: For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Safety Data Sheets that comply with the Hazard Communication Standard, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.
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Immediately Dangerous to Life or Health (IDLH)- any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a Confined Space.

Non-Permit Confined Space- A Confined Space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

Oxygen Deficient Atmosphere- an atmosphere containing less than 19.5 percent oxygen by volume.



Permit Required Confined Space- a Confined Space that has one or more of the following characteristics:

- Contains or has the potential to contain a Hazardous Atmosphere.
- Contains material that has the potential for Engulfing an Entrant.
- Has an internal configuration such that an Entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section.
- Contains any other recognized serious safety or health hazard.

Permit(s)- the employer's written procedure for preparing and issuing Permits for Entry and for returning the Confined Space to service following termination of Entry.

Rescue Service(s)- personnel designated to rescue Workers from Permit-Required Confined Spaces.

Policies

An evaluation of potential spaces shall be conducted using the flowchart in Appendix 1.

Note: Examples of potential permit-required confined spaces are: Storage tanks, frac tanks, flow pits, mud pits, compressor coolers, crank cases, cooling towers, fan shrouds and production equipment (e.g. heater treater, separator, etc.)

All permit-required confined spaces shall be secured.

Marking

All permit-required confined spaces shall be marked with signs or stickers placed on or near the entry point.

The graphic shall be:



Reclassification

A permit required space may be reclassified as a non-permit-required space if all hazards within the space are eliminated.

Each reclassification requires a completed permit space reclassification form found on the forms page of Validus.Energy.

The reclassification form must be approved by an Operations Leader and an EHS Representative prior to entry.



Training

Employees shall receive awareness level training that contains at a minimum the following:

- Definitions of confined and permit-required confined spaces
- The requirements of the Validus Energy confined space program
- When reclassification is acceptable
- How to complete the reclassification

Employees will be retrained:

- Whenever there is a change in Confined Space operations that presents a hazard for which the employee has not been trained.
- Whenever the Supervisor has reason to believe there are inadequacies in the Workers knowledge or use of these procedures.

Review

This program will be reviewed at least annually by the EHS Department.



Appendix 1

Confined Space Classification Flowchart



