



WASTE MANAGEMENT PROGRAM



Purpose

The Waste Management Program establishes a company-wide framework for the identification, handling, storage, transportation, recycling, and disposal of waste. This program supports Validus Energy's efforts to comply with environmental regulations and protect the environment.

Scope

This program applies to all field offices, well sites, pads, tank batteries, production facilities, midstream facilities under Validus Energy's control. It governs waste streams generated on Validus Energy worksites.

Process

Identify and manage all waste streams according to state and federal requirements.

Promote waste reduction, reuse, and recycling wherever it is feasible.

Ensure compliance with **RCRA, EPA, DOT**, state and local requirements.

Standardize waste, handling practices, documentation and vendor usage.

Minimize environmental impacts from waste generation and disposal.

Responsibilities

Supervisors	Ensure employees understand the details of the Waste Management Plan and verify that contractors who handle waste streams are on the Approved Vendor List (AVL) prior to the disposal of waste.
EHS	Facilitate annual training for Validus Employees and conduct audits and regulatory reporting as required. Oversee the waste Manifest documentation and tracking process.
Validus Employees	Complete training and adhere to the requirements of this Waste Management Program and utilize provided waste disposal sites and procedures.

Definitions

Hazardous Waste	Discarded material that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may pose a substantial or potential threat to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Is a solid waste that is listed in 40 CFR Part
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261 Subpart D in F, K, P or U lists or is a characteristic waste as defined in Subpart C Part 261.

Non-Hazardous Waste Discarded material that does not meet the criteria to be classified as **Hazardous Waste** under federal or state regulations.

Regulated Waste Discarded material that is subject to specific handling, storage, transportation, and disposal requirements under federal, state, or local laws and regulations.

Manifest A shipping document that tracks the movement of **Regulated Waste** from the point of generation to its final disposal or treatment facility.

RCRA Resource Conservation and Recovery Act

EPA Environmental Protection Agency

DOT Department of Transportation

Policies

Validus Provided Waste Disposal Locations

Waste disposal locations with disposal containers will be provided for use by Validus Employees only. These containers are meant for empty aerosol containers, oily rags and absorbents, oil impacted gloves and used filters that do not meet the definition of **Hazardous Waste**.

All Validus Employees are responsible for maintaining the disposal locations and ensuring proper use of the sites as follows:

1. Contract workers are required to collect and dispose of their own waste generated on Validus locations following their own waste management programs and policies.
2. Use labeled, closed, and compatible containers for appropriate waste types.
3. Store waste containers in secondary containment as necessary.
4. Segregate waste.
5. If you suspect discarded material contains **Hazardous Waste**, contact EHS.
6. Keep waste drum lids closed and secure waste storage areas against weather, wildlife, and unauthorized access.
7. For disposal of chemicals and used chemical totes, contact EHS or the Validus Chemical Program manager.



Management of Impacted Materials

Oil impacted soils and liquids must be managed separately and are not approved for disposal at Validus managed waste disposal locations with the exception of Validus-owned saltwater disposal locations approved to process and inject waste fluids.

All Validus Employees are responsible for ensuring proper treatment and disposal of impacted soils and liquids according to the Incident Management Policy and as follows:

1. Only fresh water that accumulates in berms may be discharged on pad. Validus Employees are responsible for completing the appropriate documentation for each discharge.
2. All spills and releases from primary containment shall be reported to EHS and managed as required.
3. Only approved contractors shall be used to treat onsite and/or dispose of oil impacted materials.

Waste Classification Transportation and Disposal

- Only use approved and licensed waste haulers and disposal facilities.
- If you have questions about waste classification, including classification of a Regulated Waste or Hazardous Waste, contact EHS.
- Required Waste Manifests will be generated as necessary and kept electronically for audit purposes.

Training

- New field personnel receive waste handling training during onboarding.
- Annual waste management refresher training is required for all field personnel.
- Specialized training will be provided as necessary.

Inspections, Recordkeeping and Reporting

- Field waste disposal locations shall be inspected periodically, with necessary corrective actions completed as soon as feasible.
- Waste profiles, Manifests, disposal receipts, and inspection logs will be kept electronically for a minimum of three (3) years.
- Federal or state reports shall be filed as required.



Program Review and Updates

This Waste Management Program will be reviewed annually. Updates will be communicated to all relevant field personnel and contractors.



Appendix A:

Vendor Name: Rose Rock Environmental Services, LLC

Service Type: Waste Transportation, Disposal, and Documentation

Approved For: Non-Hazardous Waste streams generated from upstream oil and gas operations including, but not limited to:

- Used absorbents (diapers, pads, rags)
- Oily solids and contaminated soils
- Produced water residuals
- Used oil and dehy filters

Contact Information:

- Primary Contact: Jonathan Behymer, President
- Phone: (405) 883-1069 – Office

Additional Notes:

- Vendor is responsible for providing manifests, waste profiling, and monthly disposal reports.
- All pickups must be scheduled at least 24 hours in advance.
- Ensure drums are properly labeled and staged in accordance with site-specific guidelines before transport.






Incident Management

Final Audit Report

2025-08-21

Created:	2025-08-14
By:	Jennifer Shea (jennifers@validus-energy.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAo6mdt583Z2JBeClqGb23M5xTi0mHdg8g

"Incident Management" History

-  Document created by Jennifer Shea (jennifers@validus-energy.com)
2025-08-14 - 3:08:45 PM GMT
-  Document emailed to Donald Amos (dona@validus-energy.com) for signature
2025-08-14 - 3:08:48 PM GMT
-  Email viewed by Donald Amos (dona@validus-energy.com)
2025-08-21 - 3:18:20 PM GMT
-  Document e-signed by Donald Amos (dona@validus-energy.com)
Signature Date: 2025-08-21 - 3:18:44 PM GMT - Time Source: server
-  Agreement completed.
2025-08-21 - 3:18:44 PM GMT