



EXTENDED DURATION INCIDENT MANAGEMENT



Purpose

The purpose of this document is to assist the emergency response team to schedule changeouts and provide proper relief into a repeatable system for incidents that continue beyond the initial response, it is not a mandatory component of the Validus Emergency Response Guide.

This document may be used during an emergency formally declared or classified under the Emergency Response Guide.

Operational events may use incident command principles and similar staffing practices without activating this document or changing the event's classification."

Scope

This document applies to all Validus Energy worksites and employees.

Process

Activate the ERG first for emergency classification, initial notifications, position descriptions, incident-specific response actions, and the initial Incident Action Plan.

Use this document when the incident is expected to span a shift, require more than one operational period, or create a fatigue, logistics, documentation, or continuity risk.

Responsibilities

Leadership	Commit to, follow, and reinforce the requirements set forth in this document as needed. Provide sufficient resources for implementation.
Supervisors	Ensure Validus employees have the knowledge and skills to follow this document. Verify employees follow the work/rest schedules as assigned.
EHS	Support the Emergency Manager and Incident Commander
Validus Employees	Complete training and adhere to the requirements set forth in this document.

Definitions

Operational period is the time scheduled for executing a specific set of actions in the approved IAP. Twelve hours is the default for sustained operations.

Duty period is all work time, including prior company work, travel between assigned locations, briefing, turnover, paperwork, and post-shift decontamination.

Changeout is the planned replacement of an individual, crew, equipment set, or command function by a qualified and briefed relief resource.

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Transfer of command is the documented process by which command authority moves to a qualified replacement after a briefing and organization-wide announcement.

Rehabilitation A controlled rest, cooling/warming, hydration, nourishment, medical monitoring, and PPE recovery process before reassignment.

Activation and Escalation

The Incident Commander (IC) and Emergency Manager (EM) may activate this plan when any one of the following is present or reasonably expected:

- Response operations will continue beyond 8 hours or through a normal crew change.
- The incident requires a second operational period or overnight operations.
- A Level 2 or Level 3 emergency requires continuing field and EOC coordination.
- The response requires multiple agencies, contractors, specialized teams, or a sustained staging area.
- Critical personnel have already worked enough hours so that safe continuity cannot be maintained through the next planned objective.
- The incident creates ongoing public, environmental, well-control, fire, security, medical, spill-response, or business-continuity consequences.

Timeline

Time	Required action	Primary owner
Immediately	Declare extended operations, begin tracking work hours, and set the end time for the current operational period.	IC / Safety
Within 30 min	Notify the Emergency Manager, identify command relief, and assign Planning and Logistics roles.	IC / EM
Within 2 hours	Prepare a 24-hour staffing and shift-change plan. Notify Team B and essential vendors.	Planning / Logistics
Within 4 hours	Confirm lodging, meals, transportation, sanitation, lighting, fuel, communications, PPE, and equipment.	Logistics
By hour 6	Confirm the arrival times and qualifications of personnel relieving the first shift.	Planning
By hour 8	Issue objectives and a schedule for the next operational period. Determine if a third rotation is necessary.	IC / Planning
By hour 10	Begin relief personnel check-in, site orientation, and role briefings.	Staging / Supervisors
By hour 12	Complete the shift change or document an approved temporary exception.	IC / Safety
At 24 hours	Reassess the emergency level, staffing, objectives, community impacts, and recovery plan.	IC / EM

Note:

The ERG lists events lasting more than one day as a Level 3 example. At the 24-hour mark, the IC and EM shall document the emergency-level reassessment and communicate any change.

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Sustained Command and Organization

During an extended duration response, the ERG Incident Command System remains in effect.

Positions may be combined, but sustained operations require enough depth to maintain span of control, planning discipline, and relief. (See Appendix 1 for the staffing plan assignment table)

Minimum ICS Staffing for an Extended Event

Function	Minimum sustained expectation	Relief depth
Incident Command	IC plus Deputy or named relief IC	Two qualified people initially; three by 24 hours
Operations	Operations Chief supported by field supervisors	Qualified relief for every shift
Safety	Safety Officer with stop-work authority	Continuous coverage with a full handoff
Planning	Planning lead responsible for status, plans, staffing, and forecasts	Day and night coverage
Logistics	Logistics lead responsible for personnel needs, equipment, facilities, meals, lodging, and transportation	Day and night coverage
EOC / Emergency Management	Emergency Manager supported by EHS, Legal, Operations, Security, Communications, IT, and a scribe as needed	Primary and backup assigned for each active role
Finance / Administration	Support for costs, timekeeping, purchasing, contracts, claims, and records	Daily coverage or continuous coverage during heavy purchasing

Span of control

- The IC will assign additional supervisors before anyone has more than seven direct reports.
- Anyone filling two roles may have only one field assignment and must give up a role if the workload becomes unsafe.
- Every active position must have a qualified backup and planned relief time listed on the staffing roster.
- The outgoing person remains responsible until the replacement accepts the role and the change is communicated.

Staffing

- Use 5:30 a.m.–5:30 p.m. and 5:30 p.m.–5:30 a.m. duty windows for shift changes at 6:00 a.m. and 6:00 p.m. The 30-minute overlap supports a safe handoff.
- Support staff shifts may be staggered only when coverage and communication are maintained. The IC, Operations Chief, and Safety Officer require a specific handoff plan.
- Keep crews together when practical. For specialized teams, retain one rested and qualified person to support continuity when safe.
- Personnel coming from their normal job are not considered rested. All earlier work hours count toward their duty limit.



Position Changeout

Position	Relief trigger	Changeout requirement
Incident Commander	At 12 total duty hours or earlier if necessary	Face-to-face transfer, written briefing, and announcement to all active functions
Operations Chief	At 12 total duty hours or earlier if necessary	Review current work, hazards, personnel, control points, resources, and pending decisions
Safety Officer	Continuous coverage; no gap while hazardous operations continue	Review hazards, air monitoring, injuries, PPE, fatigue concerns, and stop-work items
Planning Chief	At 12 hours or before the next planning cycle begins	Transfer the current plan, situation status, resource status, forecasts, and incomplete documents
Logistics Chief	At 12 hours or earlier if order backlog cannot be controlled	Transfer open requests, vendor status, arrival times, lodging, meals, transportation, equipment, and purchasing needs
Field crews	At 12 hours maximum scheduled duty; earlier if necessary	Confirm personnel, inspect equipment, tailgate meeting to review the PJSA, and complete a supervisor handoff

Note:

If relief will not arrive before a duty limit, notify Planning, Logistics, and Safety.

Recommended Maximum Work Hour Limits.

- Normal target - No more than 12 total duty hours in a rolling 24-hour period for emergency assignments.
- Protected time off - At least 10 consecutive hours off between duty periods; 12 hours is preferred when travel or sleep conditions reduce recovery.
- Extended duty - More than 12 hours requires IC and Safety Officer approval, a documented reason, a named relief time, and removal from unnecessary driving or high-risk work. (Appendix II)
- Safety-critical ceiling - At 14 total duty hours, remove the person from driving, equipment operation, hot-zone entry, energy isolation, lifting/rigging, line breaking, and independent command decisions.
- Absolute ceiling - No work beyond 16 total duty hours except an immediate life-saving action when no safer option exists. Relieve the person as soon as the immediate threat is controlled.
- Consecutive duty - At least one full 24-hour rest period every 7 days. Plan relief earlier when necessary.

Fatigue Monitoring

- Supervisors should check personnel for signs of fatigue at check-in, at least every four hours, before safety-critical work, after a significant upset, and before release to drive
- No person who reports fatigue shall be directed to drive.
- A person at or above 14 total duty hours shall not drive a company vehicle or personally drive from the assignment. Utilize ride sharing services or other means of transportation.

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Recovery, Demobilization, and Closeout

Transition

Emergency response ends only when the IC determines that immediate threats are controlled and responsibility can move to a defined recovery organization.

Recovery may begin while some response functions remain active.

Expected Transition Actions

- Define the safe operating condition and verify it through inspection, monitoring, testing, or engineering review.
- Identify remaining environmental cleanup, waste, sampling, repair, security, landowner, regulatory, and community commitments.
- Assign a Recovery Manager and transfer open objectives, authority, resources, records, and reporting expectations.
- Maintain fatigue, contractor, traffic, and PJSA controls during cleanup and restoration.
- Separate incident preservation/investigation needs from repair work and obtain authorization before disturbing evidence.

Demobilization

Planning develops the demobilization plan; Operations identifies resources no longer needed; Logistics coordinates inspection, return, transport, and property restoration; Safety verifies exposure/injury follow-up and travel fitness.

Closeout

- The IC ends or transitions the response and communicates the effective time.
- The Emergency Manager schedules a hotwash and a formal review with Validus personnel, contractors, and first responders.
- EHS and leadership begin the investigation phase and preserve evidence and records.
- Finance reconciles authorizations, contracts, invoices, labor hours, claims, and estimated costs.



Appendix 1

Staffing Plan



Day __

Role	Initial Assignment	Duty start	Duty Finished	Relief person	Duty start	Duty Finished
Incident Commander						
Deputy IC						
Operations Chief						
Safety Officer						
Planning Chief						
Logistics Chief						
Emergency Manager						
PIO						
Liaison Officer						
Staging Leader						
Finance/Admin						
EOC Scribe						

Day __

Role	Initial Assignment	Duty start	Duty Finished	Relief person	Duty start	Duty Finished
Incident Commander						
Deputy IC						
Operations Chief						
Safety Officer						
Planning Chief						
Logistics Chief						
Emergency Manager						
PIO						
Liaison Officer						
Staging Leader						
Finance/Admin						
EOC Scribe						

Print additional copies as needed

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Appendix 2

Temporary Extended-Duty Exception Form



Temporary Extended Duty Exception Form

This form is required when duty will exceed 12 consecutive hours. Incident Commander and Safety Officer approval, a documented reason, a named relief time, and removal from unnecessary driving or high-risk work are required.

Personnel and assignment

Employee name: _____ Role or unit: _____
Incident or event: _____ Operational period: _____
Duty start date and time: _____ 12-hour limit date and time: _____

Documented reason for exception

Reason extended duty is operationally necessary. (Include why the work cannot be deferred or reassigned)

Relief plan and work restrictions

Named relief person: _____ Employee release no later than: _____
Person confirming relief: _____ Expected handover time: _____
Transportation and rest plan: _____ Maximum total duty hours: _____

Approval (Both approvals are required and are valid only through the named relief time.)

Incident Commander

Name: _____
Decision: ☐ Approved ☐ Denied
Signature: _____
Date and time: _____

Safety Officer

Name: _____
Decision: ☐ Approved ☐ Denied
Signature: _____
Date and time: _____

Closeout

Actual relief date and time: _____ Actual total duty hours: _____
Restrictions maintained through release: ☐ Yes ☐ No Safety concerns observed: ☐ No ☐ Yes
Comments or follow-up actions: _____



Change Log

[illegible]