

Spill Prevention Control and Countermeasure Plan (SPCC Plan)

For

Nabors Well Services Co.

**Workover Department Plan
Production Department Plan
Special Services Department Plan**

Currently Dispatched from:

**Rosedale Highway Rig Operations Facility
James Road Rig Operations Facility
Special Services Rig Operations Facility
Bakersfield, California**

**Rancho Dominguez Rig Operations Facility
Ventura Rig Operations Facility
Santa Maria Rig Operations Facility**

**Original Date of Plan: August, 2006
Revised Plan Dated: September 20, 2010**

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**Professional Engineer's Review
Spill Prevention Control and Countermeasures (SPCC) Plan
September 2010**

CERTIFICATION

I hereby certify that, being familiar with the provisions of 40 CFR, Part 112, and this SPCC Plan has been prepared in accordance with good engineering practices for **Nabors Well Services Co.**, Workover Department, Production Department, and Special Services Department, that operates land-based rigs and Special Services equipment at various temporary workover and production locations.

Engineer: Nicholas Petronio

Signature: N. Petronio

Date: SEPTEMBER 21, 2010

Registration Number: 45479

State: TEXAS

Notice

The statements in this document are intended solely as guidance. This document is not intended and cannot be relied upon to create rights, substantive or procedural, enforceable by any party in litigation with the United States.



PLAN REVIEW CERTIFICATION

A review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, **Nabors Well Services Co. (NWSC)** will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event for the workover and production locations, and (2) if such technology has been field proven at the time of the review. At any time the workover and production location design, construction, operation, or maintenance occurs which materially affects the workover or production location's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines, **NWSC** will amend this SPCC Plan within six months.

Any technical amendment to the SPCC Plan shall be certified by a Professional Engineer. Small administrative changes, such as names and phone numbers, are not required to be certified by a Professional Engineer.

The District Manager or authorized representative shall review the plan at least once every five (5) years and indicate below that the plan was reviewed.

Review Dates

Signature and Title

1. _____
2. _____
3. _____
4. _____

MANAGEMENT APPROVAL

Nabors Well Services Co (NWSC) is committed to the prevention of discharges of oil into the environment and into or upon the navigable waters of the United States or adjoining shorelines. **NWSC** will maintain the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of this Spill Prevention Control and Countermeasure Plan for the **NWSC** Workover Department, Production Department and its Special Services Department. **NWSC** will provide the necessary equipment and manpower to safely and expeditiously contain and control any harmful quantity of oil that is discharged.

DAVID WERNER
Print Name

James Thomas
Print Name

[Signature]
VP General Manager

James Thomas
Regulatory Affairs Manager

1.0 GENERAL PROVISIONS

1.1 Facility Information

This Spill Prevention Control and Countermeasure Plan (SPCC) was developed to prevent oil spills from occurring and to perform safe, efficient, and timely response in the event of a spill or leak from **Nabors Well Services Co. (NWSC)** equipment working at future remote onshore oil producing companies' leases. **NWSC** is in the business of supplying mobile workover rigs and other mobile special services equipment to onshore oil producing companies. **NWSC** knows the basic attributes of each mobile workover rig and mobile special services equipment, but the work requires multiple configuration of components which cannot be detailed in the SPCC Plan. A typical onshore rig configuration used by **NWSC** is illustrated in Attachment A to this Plan.

Owner Name: **Nabors Well Services Ltd.**
515 W. Greens Road, Suite 1170
Houston, Texas 77067-4599
(281) 874-0035

Operator Name: **Nabors Well Services Co**
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Bakersfield, California 93308
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The responsible **NWSC** employee at the equipment location for spill prevention is the Rig Supervisor or the Equipment Operator of the special services equipment.

1.2 Introduction

The Spill Prevention Control and Countermeasure Plan (SPCC) was developed to provide procedures and equipment for preventing and responding to spills or accidental discharges of oil products and hazardous substances into the waters and adjacent waters of the United States. This SPCC plan also includes a description of countermeasures to mitigate such discharges should they occur. An SPCC Plan applies to all facilities of a non-transportation nature engaged in oil operations (workover, producing, gathering, storing, etc. of oil and oil products), that could reasonably be expected to discharge oil in harmful quantities into or upon the navigable waters of the United States or adjoining shorelines.

On July 17, 2002, the Environmental Protection Agency (EPA) issued a final rule amending the Oil Pollution Prevention regulation promulgated under the authority of the Federal Water Pollution Control Act (Clean Water Act) of 1972. On November 20, 2008, the EPA adopted new amendments to 40 CFR part 112. The act required the Administrator of the EPA and other Federal, State, and interstate agencies to enter into programs designed to prevent, reduce or eliminate pollution of the navigable waters of the United States by oil products emanating from non-transportation related onshore and offshore facilities. The regulation promulgated under the amendment of this act is found in Title 40 of the Code of Federal Regulations, Part 112 (40 CFR, Part 112), and is entitled "Oil Pollution Prevention".

This SPCC Plan was developed by **NWSC** to establish procedures, methods and other requirements to prevent the discharge of oil from non-transportation related onshore and offshore facilities into or upon the navigable waters of the United States or adjoining shorelines or waters in connection with activities under the Outer Continental Shelf Land Act. The regulations require that the Plan be maintained at an appropriate place near or at the facility. Because of the transient nature of **NWSC** workover and production locations, this SPCC Plan shall be maintained at each

rig operations facility immediately upon location construction when the threshold quantity of oil products is exceeded.

The operator of a facility for which the SPCC Plan is required must maintain a complete copy of the plan at the facility if the facility is normally attended at least four hours per day. The SPCC Plan must be made available to the EPA Regional Administrator and state personnel for on-site review anytime during normal working hours.

1.2.1 Plan Amendments

The owner/operator is required to review and to amend the SPCC Plan at least once every five (5) years and if such a review indicates more effective control and prevention technology (and if such technology has been proven) will significantly reduce the likelihood of a spill event. Any technical or structural amendment to the SPCC Plan shall be certified by a Professional Engineer. Small administrative changes, such as names and phone numbers, are not required to be certified by a Professional Engineer. Any amendments to the plan must be implemented no later than six months following preparation of the amendment. The owner/operator is required to amend the SPCC Plan for the following reasons:

- When there are changes in facility design, construction, operation, or maintenance that materially affects the potential for an oil discharge as described in 40 CFR 112.1 (b).
- When required by the EPA Regional Administrator after review of the SPCC Plan, submitted because of a spill event.

Unless an extension of time has been granted by the EPA Regional Administrator, the operator must submit the SPCC Plan with any amendments to the EPA and appropriate state agencies when a facility has:

- Discharged more than one thousand (1000) US gallons (approximately 24 barrels) of oil products into navigable waters in a single discharge as described in 40 CFR 112.1(b); or
- Discharged more than 42 US gallons of oil in each of two discharges as described in 40 CFR 112.1 (b), occurring within any twelve month period.

Within sixty (60) days of a discharge as described above, the operator must submit the following information to the EPA Regional Administrator:

1. Name of the facility;
2. Name of the owner/operator of the facility;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action measures and countermeasures taken, including a description of equipment repairs and replacements;
6. An adequate description of the facility, including maps, flow diagrams, and topographic maps, as necessary;
7. The cause of the discharge, including a failure analysis of the system or the subsystem in which failure occurred. The failure analysis should examine and explain the nature of the failure that caused the spill.
8. A description of additional preventive countermeasures taken or considered to minimize the possibility of recurrence; and
9. Any other information required by the EPA Regional Administrator that is pertinent to the plan or discharge.

A complete copy of all information provided to Regional Administrator must also be forwarded to the state agency in charge of oil pollution control.

1.3 Purpose

This SPCC Plan was developed to detail procedures and equipment required for preventing and responding to spills or accidental discharge of oil products into adjacent navigable waters during future onshore workover and production operations by **NWSC**. This plan also includes countermeasure activities designed to provide safe, effective measures to mitigate such discharges should they occur. **NWSC** has several hundred equipment units and rigs that operate each day at different workover and production locations. **NWSC** activities performed by these equipment units and rigs will require the equipment to remain on each workover and production locations from one to five days. These workover and production locations are located on oil producing companies' leases.

This SPCC Plan may also be used as a reference and guidance tool for the facility. It can be referenced frequently for the following purposes:

- As a guide for training new employees (and review for existing employees) on techniques for mitigating oil spills.
- As a reference for oil storage and containment system information.
- As a resource during emergency situations.

1.4 Definitions

Discharge: includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying or dumping of oil (40 CFR 112.2). The term shall not include any discharge of oil which is authorized by a permit issued pursuant to Section 13 of the River and Harbor Act of 1899 (33 U.S.C. 407).

Harmful Quantities: include those discharges which violate applicable water quality standards or cause film, sheen, or discoloration of the surface of the water, or cause sludge or emission to be deposited beneath the surface of the water.

Navigable Waters: includes waters declared navigable by a Federal agency or court, tributaries of navigable waters, and interstate lakes, river and streams from which shellfish are taken and sold in interstate commerce, or which are utilized by interstate travelers for recreational or other purposes, as well as territorial seas. In general, every body of water or continuous stream should be considered navigable.

Oil: refers to any kind or form of oil including (but not limited to) petroleum, fuel, oil, sludge, synthetic oils, minerals oils, oil refuse and oil mixed with wastes other than dredged spoil. (40 CFR 112.2)

Oil-filled operational equipment: means equipment that includes an oil storage container in which the oil is present solely to support the function of the apparatus or device. Examples of oil-filled operational equipment includes, but are not limited to, hydraulic systems, lubricating systems, gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.

Oil Spill Removal Organization (OSRO): means an entity contracted by an owner or operator to provide spill-response equipment and/or manpower, in the event of an oil or hazardous substance spill.

Produced Water: includes liquids and suspended particulate matter that is obtained by processing fluids brought to the surface in conjunction with the recovery of oil and gas from underground geologic formations, with underground storage of hydrocarbons, or with solution mining of brine.

More definitions can be found in 40 CFR 112.2.

2.0 SPILL PREVENTION CONTROL AND COUNTERMEASURES

2.1 Storage Tanks (*See Attachment A for Rig-Specific Information*)

Attachment A includes a diagram depicting a typical layout of a **NWSC** onshore workover and production rig. The layout, capacities of the tanks, and equipment required on location depicted in the figure may vary somewhat at each location; however, the type of product stored in each tank remains the same.

Storage tanks normally used at each **NWSC** workover and production location are located on the equipment unit and contain materials subject to SPCC regulatory requirements are listed as follows:

- Diesel fuel storage tanks on the workover or production rig ranges from 100 to 220-gallons diesel tank. These are typically steel-walled, round, and closed-top construction.
- Diesel fuel storage tanks on equipment being used at the location – the power swivel has a 50-gallon diesel tank, the generator has a 50-gallon diesel tank, the mud pump has a 120-gallon diesel tank, coil tubing units 240-gallon, cement pump trucks 120-gallon, vacuum trucks 120-gallon, bulk trucks 120-gallon and the foamer has a 500-gallon diesel tanks. These are typically steel-walled, round, and closed-top construction.
- Hydraulic oil storage tanks on the equipment being used at the location includes: rigs 100-220-gallons, foamers 40-100-gallons, coil tubing units 150-gallons, power swivels 35-gallons and mud pumps 50-gallons.
- 15-40 WT oil storage tanks on the equipment being used at the location includes: rigs 10-gallons, foamers 10-gallons and mud pumps 10-gallons.
- 10 WT oil storage tanks on the equipment being used at the location includes: rigs 10-gallons, foamers 10-gallons and mud pumps 10-gallons.
- 80-90 WT gear oil storage tanks on the equipment being used at the location includes: rigs 10-gallons, foamers 10-gallons and mud pumps 10-gallons.
- Transmission oil storage tanks on the equipment being used at the location includes: rigs 10-gallons, foamers 10-gallons and mud pumps 10-gallons.
- Air compressor oil storage tanks on the foamers ranges from 12 to 50-gallons.

Each tank is monitored while filling, and rig employees perform daily visual tank inspections for leaks.

2.2 Potential Releases

Potential releases consist of the following in decreasing order of magnitude:

- Well blowout (rare event), volume unpredictable and can consist of produced hydrocarbons, brine and gas.
- Catastrophic failure of mud storage tanks (primarily consisting of water and well fluids). Worst-case maximum release is 100-barrels.
- Catastrophic failure of fuel storage tank (diesel, maximum release of 300 gallons).

- Minor spill associated with fuel transfer operation. NWSC personnel are present at all times during the transfer operation. Estimated worst-case maximum discharge is less than 40 gallons.
- Minor spills associated with workover operations, production operations, critical connections of hoses and piping, and fluid pumps. Estimated worst-case maximum discharge is less than 1 barrel.

2.3 Spill Prevention Procedures and Containment Procedures

In accordance with SPCC requirements, the following general spill prevention and containment procedures are in place at each **NWSC** onshore workover or production rig:

- The **NWSC** rig supervisor will perform an assessment of each well location before starting operations. This orientation will include studying the slope of the location, deter the flow of fluids if a potential releases occurs, study the surrounding areas, and study the adjacent waters and navigable waters. The assessment will ensure compliance with prevention procedures listed in the SPCC Plan. Most well locations are graded to slope all discharged materials away from any navigable waterway. If the **NWSC** rig supervisor believes that the positioning of **NWSC** equipment could result in a damaging discharge, he is required to report his findings to the oil producing company supervisor.
- A well blowout represents the worst-case discharge. During workover operations and during most production operations, a blowout prevention (BOP) assembly is installed which is capable of controlling any wellhead pressure that may be encountered. When in place, all **NWSC** well control systems and BOP equipment are inspected each day to ensure compliance. If the NWSC rig supervisor believes that the well control systems or BOP equipment can not control the wellhead pressure, he is required to report his findings to the oil producing company supervisor. The oil producing company will make decisions to ensure compliance with federal and state regulatory agency requirements.
- Primary containment consists of above-ground steel mud tanks and steel storage tanks that are located on each equipment unit. **NWSC** equipment operators are continually inspecting the equipment during operations for possible leaks and spills.
- In the event that an abnormal or accidental spill occurs which is greater than the containment (such as during heavy rains or well blowout), **NWSC** has developed a procedure to notify the oil producing company supervisor and to utilize any earth moving equipment which is currently operating on the lease to build additional dirt dikes to contain the spill.

2.3.1 Preventive Maintenance Program

NWSC has developed a preventive maintenance program to provide our customers with well maintained, safe and reliable equipment. The preventive maintenance program includes, but not limited to, delegating maintenance responsibilities, accountability for maintenance, tracking of maintenance response time, reduction in unplanned maintenance, reduction in downtime, standardization of maintenance, extended life of the equipment, improve safe operation of the equipment, documentation and a maintenance history on each asset. **NWSC** has developed a software application called myMaintenance to ensure compliance with the preventive maintenance program, scheduling maintenance, automatically generating work orders, seed procedures, tracking maintenance response times and developing a maintenance history on **NWSC** equipment.

- The main element of the preventive maintenance program is daily inspections of the equipment. Each day the rig supervisors, crew chiefs, equipment operators or the equipment crew workers will inspect the equipment and complete the NWS Daily Rig Maintenance Log (the log) which lists any deficiencies found. The log is signed by all the crew workers and approved by the rig supervisor. The log is sent to the dispatching office

and the data is entered in myMaintenance each day. MyMaintenance will automatically generate work orders and send the work orders to the equipment coordinators for scheduling.

- The inspection includes, but not limited to, the following: traveling blocks, carrier, drawworks, derricks, engines, transmission, hoses, chains, belts, guards, hubodometer, batteries, air compressors, decals, brake systems, lights and gauges.
- All of **NWSC** equipment is lubricated by **NWSC's** lube trucks. This lubrication process is performed either every 7 weeks or every 90 days depending on the type of equipment. During the lubrication process, the mechanic will perform a detailed inspection of the equipment which includes, but is not limited to, the following: check the OilVac system, batteries, transmission, engines, radiators, spark arrestors, hydraulic systems, drop boxes, jacks, fans, guards, air compressors, power steering, decals, air winches, chains, suspension, brake assemblies, king pins, tie rods, ball joints, main drum bearings, clutches, traveling blocks, raising rams, scoping rams, sheaves, anti-fall devices, gauges, cooling systems, charging systems, under carriage, derricks and derrick lights. Special attention is given to hoses, fittings and filters to reduce potential releases. In addition, special attention is given to the emergency air intake shutdown system and the system is checked to make sure shutdown will kill the equipment.

2.3.2 NWSC Lubrication Program

One of the sources of a potential release could occur during the lubrication of **NWSC** equipment. **NWSC** developed a lubrication program that employs the OilVac System. The OilVac is a self-contained automatic lubrication fill system that is used to service five major components: the transmission, the engine, the hydraulic system the right angle drive, and the drop box. The OilVac system uses pressure to dispense fluid from the tanks on the equipment to the components. The system is hard-piped and this greatly reduces exposure to the environment the amount of fluids dispensed. This protects the components filled by the system from exposure to the abrasion and corrosion caused by contaminated fluids, resulting in longer life of these components.

- During the service procedure, spent fluid is pumped from the equipment using pressure to the waste tank on the service truck and hauled off the work site. The service truck will return to the dispatching yard and waste oil is collected in a waste oil tank. The oil is disposed using a certified waste hauler once every six weeks.
- During the service procedure, replacement fluid is pumped using the same pressurized system to fill the components and the storage tanks on the equipment.
- During the lubrication process, the mechanic will perform a detailed inspection of the equipment which includes, but is not limited to, the following: check the OilVac system, batteries, transmission, engines, radiators, spark arrestors, hydraulic systems, drop boxes, jacks, fans, guards, air compressors, power steering, decals, air winches, chains, suspension, brake assemblies, king pins, tie rods, ball joints, main drum bearings, clutches, traveling blocks, raising rams, scoping rams, sheaves, anti-fall devices, gauges, cooling systems, charging systems, under carriage, derricks and derrick lights. Special attention is given to hoses, fittings and filters to reduce potential releases. In addition, special attention is given to the emergency air intake shutdown system and the system is checked to make sure shutdown will kill the equipment.
- The pressurized system will reduce potential releases during the lubrication process.

2.3.3 Material Transfer

NWSC mobile workover rigs and mobile special services equipment is operated at remote onshore well sites belonging to oil producing companies. **NWSC** is required to deliver diesel fuel to these remote sites. Diesel fuel is delivered to the workover or production location by **NWSC** tool trucks or other **NWSC** equipment. Spill prevention during deliveries is primarily the responsibility of

NWSC employees. **NWSC** is providing the procedures and countermeasures to mitigate the spill or accidental discharge of hazardous substances during the transfer process.

- All the **NWSC** tool trucks are equipped with automatic shutoff nozzles to prevent overfill of the tanks.
- Before the transfer process starts, a **NWSC** employee ensures that the equipment has sufficient capacity in the storage tank to accommodate the transfer.
- Before the transfer process starts, a **NWSC** employee ensures that fuel being transferred is the correct product.
- Before the transfer process starts, a **NWSC** employee will inspect the equipment to make sure that all connections are secure.
- A **NWSC** employee will be in attendance at all times while transferring fuel. If a leak or spill occurs, the transfer process can be stopped immediately.
- A **NWSC** employee will monitor the fueling area for safe and proper operations.
- A **NWSC** employee will take immediate action to correct any deficiencies in the transfer process.
- A **NWSC** employee will secure the diesel fueling nozzle and hose on the tool completion of fuel transfer.

2.3.4 Security

Most **NWSC** land-based workover or production rigs are generally not accessible to the general public. Most of the customers' leases are fully fenced and the entrance gates are locked and/or guarded. Adequate lighting is provided by **NWSC** equipment at all times to allow safe fuel transfer operations and identification of spills during dark hours of operation. **NWSC** has developed the procedure to have most fuel transfer operations take place during normal daylight hours, and if fuel transfers do occur during darkness, **NWSC's** procedures utilize two **NWSC** employees at each end of the fuel transfer hose to prevent any discharge.

2.3.5 Inspections

Tanks, valves, lines, and other ancillary equipment associated with liquid storage are inspected every morning by the **NWSC** rig employees before starting workover or production activities. The Rig Supervisor performs inspections during workover or production activities to identify any discharges. All of the inspection detailed in the preventive maintenance program and the lubrication program section are performed on a regularly schedule timetable. Any problems identified during inspection will be immediately reported to the Rig Supervisor. Leaks or spills from tank walls, piping, or other equipment components are immediately reported to the area manager by the Rig Supervisor, and the maintenance department will repair the problems as soon as possible to minimize the potential damages for the spills and leaks.

2.3.6 Temporary Spill Prevention Procedures Amendments

Throughout the State of California, there are several ecologically sensitive areas. Some of these sensitive areas are adjacent to **NWSC's** customers' leases. These sensitive areas may require additional spill prevention controls and countermeasures to prevent accidental discharges into adjacent waters or other structures.

In the event that **NWSC** services are required in one of these ecologically sensitive areas, **NWSC** and its customer will develop a Temporary Spill Prevention Procedure Amendment to address the prevention controls and countermeasures required to work in these sensitive areas. The amendment will be a written document outlining the additional requirements. The Temporary Amendments will be made a part of the **NWSC** SPCC Plan and the rig supervisor will keep a copy on location at all times. While working at the sensitive areas, **NWSC** will ensure compliance to the

additional requirements. At the completion of the working in the sensitive areas, **NWSC** will remove the Temporary Spill Prevention Procedures Amendments from the SPCC Plan.

3.0 SPILL RESPONSE

This section describes response protocols to be followed in the event of an oil discharge. Depending on the volume and characteristics of the materials released, the spill will be categorized as either a "Minor Spill" or "Major Spill" (major spill is considered catastrophic and requires immediate implementation of emergency response procedures).

NWSC is in the business of supplying workover or production rigs and other special service equipment to onshore oil producing companies. NWSC employees are contracted by the oil producing companies and receive instructions from the oil producing companies' supervisors. In the event of an oil spill or emergency, the NWSC rig supervisor will report the release to the oil producing companies' supervisors and comply with the emergency contingency and SPCC plans that the oil producing companies have developed for their production facility.

The Spill Response Flowchart (Attachment B) is provided as a visual tool to aid in performing procedural steps to respond to an oil spill of any magnitude. Use of the flowchart will help workover and production employees perform response actions in the proper sequence should a spill event occur.

3.1 Minor Spills

A minor spill generally involves the discharge of five (5) gallons (or less) of oil and does not pose a significant risk of harm to human health or the environment. These spills usually result from drips at connections, bucket spills, leaks from equipment, etc., and can be easily contained and disposed of by **NWSC** employees with onsite equipment. Disposable spill response materials will be containerized and kept onsite until proper disposal by an authorized removal/disposal organization. The following steps should be taken in the event of a minor spill:

- Does the spill pose imminent threat to safety?
- Stop the source if the spill is ongoing and if it is safe to do so.
- Extinguish any ignition sources.
- Immediately notify the Rig Supervisor.
- Contain the spill using onsite materials and equipment.
- Place debris in properly labeled environmental containers.
- Complete the Spill Incident Form (Attachment C) and send to the Regulatory Affairs Manager.

3.2 Major (Catastrophic) Spills

A major (catastrophic) spill would consist of a well blowout and represents a spill emergency. The provisions for spill containment and removal listed below should be performed **ONLY IF THERE IS NO HEALTH OR SAFETY DANGER**. The following steps should be taken in the event of a major spill:

If BOP is not engaged

- If the BOP is not engaged, all personnel should evacuate the spill area and move to a distance away from the spill.
- Immediately notify the Rig Supervisor.
- Call for medical assistance if personnel are injured.
- Contact the Customer's Management Team and **NWSC's** Management Team.

- If the customer has an SPCC Plan for the lease, **NWSC** employees will contact the customer's management team to receive instructions from the customer's supervisors. **NWSC** employees will comply with the emergency contingency and SPCC Plans that the customer has developed for their production facility.
- Notification of the event to the governmental agencies will be performed by the customer's management team.
- If the customer does not have an SPCC Plan for the lease, **NWSC** employees will contact the customer's management team to receive instructions. **NWSC's** management team will make the required notification to the governmental agencies.
- If possible, **NWSC** employees will contain the spill using onsite materials and equipment. If not possible, contact the OSCC for the area (Attachment D) or the OSCC that was selected by the customer.
- Complete the **Spill Incident Form** (Attachment C) and send to the Regulatory Affairs Manager.

If BOP is engaged

- Stop the source if the spill is ongoing **ONLY IF IT IS SAFE TO DO SO.**
- Extinguish any ignition sources.
- Immediately notify the Rig Supervisor.
- Contact the Customer's Management Team and **NWSC's** Management Team.
- If the customer has an SPCC Plan for the lease, **NWSC** employees will contact the customer's management team to receive instructions from the customer's supervisors. **NWSC** employees will comply with the emergency contingency and SPCC Plans that the customer has developed for their production facility.
- Notification of the event to the governmental agencies will be performed by the customer's management team.
- If the customer does not have an SPCC Plan for the lease, **NWSC** employees will contact the customer's management team to receive instructions. **NWSC's** management team will make the required notification to the governmental agencies.
- If possible, **NWSC** employees will contain the spill using onsite materials and equipment. If not possible, contact the OSCC for the area (Attachment D) or the OSCC that was selected by the customer.
- Complete the **Spill Incident Form** (Attachment C) and send to the Regulatory Affairs Manager.

In some cases, a failure of **NWSC** mud pump tanks or fuel tanks could result in a spill. Depending on the volume of oil discharged, these types of spills can generally be contained with onsite equipment. Very large spills may require the services of a qualified OSCC (see Attachment D). In the event of a tank failure, the following steps should be taken:

- Stop the source if the spill is ongoing **ONLY IF IT IS SAFE TO DO SO.**
- Extinguish any ignition sources.
- Immediately notify the Rig Supervisor.
- Contact the Customer's Management Team and **NWSC's** Management Team.
- If the customer has an SPCC Plan for the lease, **NWSC** employees will contact the customer's management team to receive instructions from the customer's supervisors. **NWSC** employees will comply with the emergency contingency and SPCC Plans that the customer has developed for their production facility.
- Notification of the event to the governmental agencies will be performed by the customer's management team.

- If the Customer does not have a SPCC Plan for the lease, **NWSC** employee will contact the customer's management team to receive instructions. **NWSC's** management team will make the required notification to the governmental agencies.
- If possible, **NWSC** employees will contain the spill using onsite materials and equipment. If not possible, contact the OSCC for the area (Attachment D) or the OSCC that was selected by the customer.
- Complete the Spill Incident Form (Attachment C) and send to the Regulatory Affairs Manager.

3.3 Waste Disposal

Waste material from minor spills will be containerized in a suitable impervious environmental drum, bag, etc. until removal by a licensed disposal company.

Waste generated from catastrophic or certain major spills will require immediate removal and disposal by an OSCC.

All waste disposals will be coordinated with oil producing company's supervisor to make sure that **NWSC** complies with the requirements of all federal and state agencies and the oil producing companies. The major reason for this coordinated effort is some agency reporting may be made by the oil producing company.

3.4 Notification and Reporting

The Rig Supervisor is responsible for completing the Spill Incident Form (Attachment C) for all spill events. This form includes the date, time, material, and quantity of oil released. The facility should maintain a copy of this form as long as the facility is in operation. A copy of this form should be forwarded to the **NWSC's** Safety Manager and **NWSC's** Regulatory Affairs Manager.

For major spill events, the Spill Incident Form should be provided to the customer's management team, the EPA Regional Administrator and the appropriate state regulatory agency as required by federal SPCC regulations. Some states utilize their own version of the spill report form.

The Rig Supervisor is responsible for initiation of the notification chain of the Customer's Management Team and **NWSC's** Management Team as indicated in the **NWSC** Customer & Internal Contact Flowchart (Attachment E). The **NWSC** Management Team contact phone numbers are found on Attachment F.

Notification of the event to the governmental agencies will be performed by the customer's management team. Upon customer request or refusal, the required notification will be performed by **NWSC's** management team. Attachment G is a list of governmental agencies in the state of California that require notification.

3.5 Field Workover and Production Locations

NWSC is in the business of supplying workover and production rigs to onshore oil producing companies. **NWSC** employees are contracted by the oil companies and receive instructions from the oil company's supervisors. In the event of an oil spill or emergency, the **NWSC** employees will report the release to the oil company supervisor and comply with the emergency contingency and SPCC Plan that the oil company has developed for their production facility.

4.0 TRAINING

Swift and efficient response during a spill event is essential for maintaining control of emergency situations. **NWSC** holds facility personnel responsible for compliance with the requirements of this SPCC Plan to participate in periodic training that teaches performance of their duties in such a way as to prevent the discharge of harmful quantities of oil and other hazardous substances.

4.1 Requirements

All **NWSC** workover and production employees are required to receive training on **NWSC** SPCC Plan. All **NWSC** workover and production employees are required to have an adequate understanding of the following:

- Inspection, operation, and maintenance of equipment to prevent oil discharges.
- Discharge procedure protocols.
- Applicable pollution control laws, rules, and regulations.
- General facility operations.
- The contents of the facility SPCC Plan.
- Spill notification and record keeping.

4.2 Other NWSC Training

All **NWSC** workover and production employees are required to participate in several training curriculums which include, but are not limited to, the following: hazard communication, flammable and combustible materials, first aid/CPR, hazardous materials, portable fire extinguisher use, respiratory protection, storm water pollution prevention, emergency response, chemical spills, endangered species protection, field hazards, fire safety, MSDS, confined space, battery handling, personal protective equipment and a hazard awareness level class.

4.3 Well Control and Blowout Prevention Training

All **NWSC** workover, production and drilling employees are required to complete well control and blowout prevention training. The well control and blowout prevention classes are accredited by IADC, API or MMS. All of the **NWSC** employees are required to attend refresher classes on a pre-determined schedule. Listed below are the classes and the employees required to take them.

- IADC WellCAP – every 2 years – 30 hour class –Offshore drilling/workover/production managers, safety professionals, supervisors, drillers, derrick workers.
- IADC Introductory Well Control – 5 years – 8 hour class – Offshore drilling/workover/production crew workers, crane operators, electricians, mechanics and roustabouts
- IADC WellCAP – every 2 years – 20 hour class – Onshore drilling managers, safety professionals, supervisors and drillers.
- IADC Introductory Well Control – 5 years – 8 hour class – Onshore drilling and workover crew workers.
- API Well Control – every 2 years – 16 hour class – Onshore production, onshore workover and onshore completion supervisors, crew chiefs, relief crew chiefs, coiled tubing supervisors and operators, fishing operations superintendents, fishing tool specialists, vacuum truck operators, cement pump operators, high pressure pump truck operators, and foam unit operators.
- API Fundamental Well Control – every 2 years – 8 hour class – Onshore production, onshore workover and completion crew workers, coiled tubing workers, vacuum truck workers, cement pump workers, high pressure pump truck workers and foam unit workers.

4.4 Person Accountable For Discharge Prevention

The Rig Supervisor is the designated person accountable for oil spill prevention and discharge control at each **NWSC** onshore workover and production rig. The Rig Supervisor is the designated person to report spills or discharges directly to the customer's management team and to **NWSC** management team.

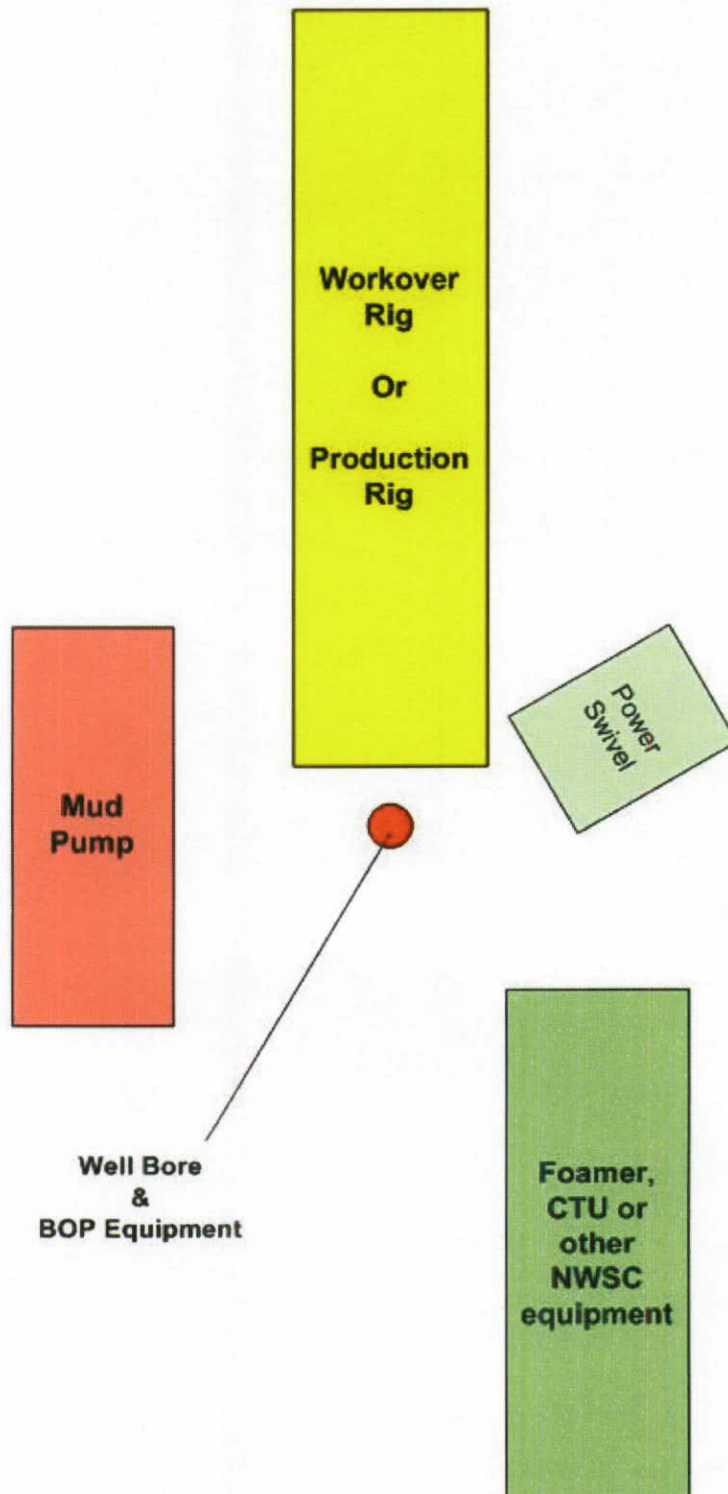
5.0 Spill Response Equipment

Proper safety equipment should be available in order to protect personnel and provide containment of materials in the event of a spill. The following materials and items have been made a part of spill prevention kit that is kept on-site at all times. The number, contents and location of spill response kits may vary at each location due to site-specific features of each rig location. **NWSC** personnel should be familiar with the location, contents and use of spill response equipment. Spill response equipment should be easily accessible to all personnel:

- Fire extinguishers
- Self-Contained Breathing Apparatus (SCBA)
- 30 gallon Metal DOT Drum
- Absorbent 25# Bag
- Booms/Socks (3)
- Universal Pads (25)
- Plastic Bags (5)
- Steel Putty
- HD Rubber Gloves (2)
- Coated Tyvek
- Shovel
- Broom
- Duct Tape (2)
- Goggles (1)
- Labels
- Emergency Response Guide

The spill kit should specify the number of each item to be kept on site to identify when restocking is necessary.

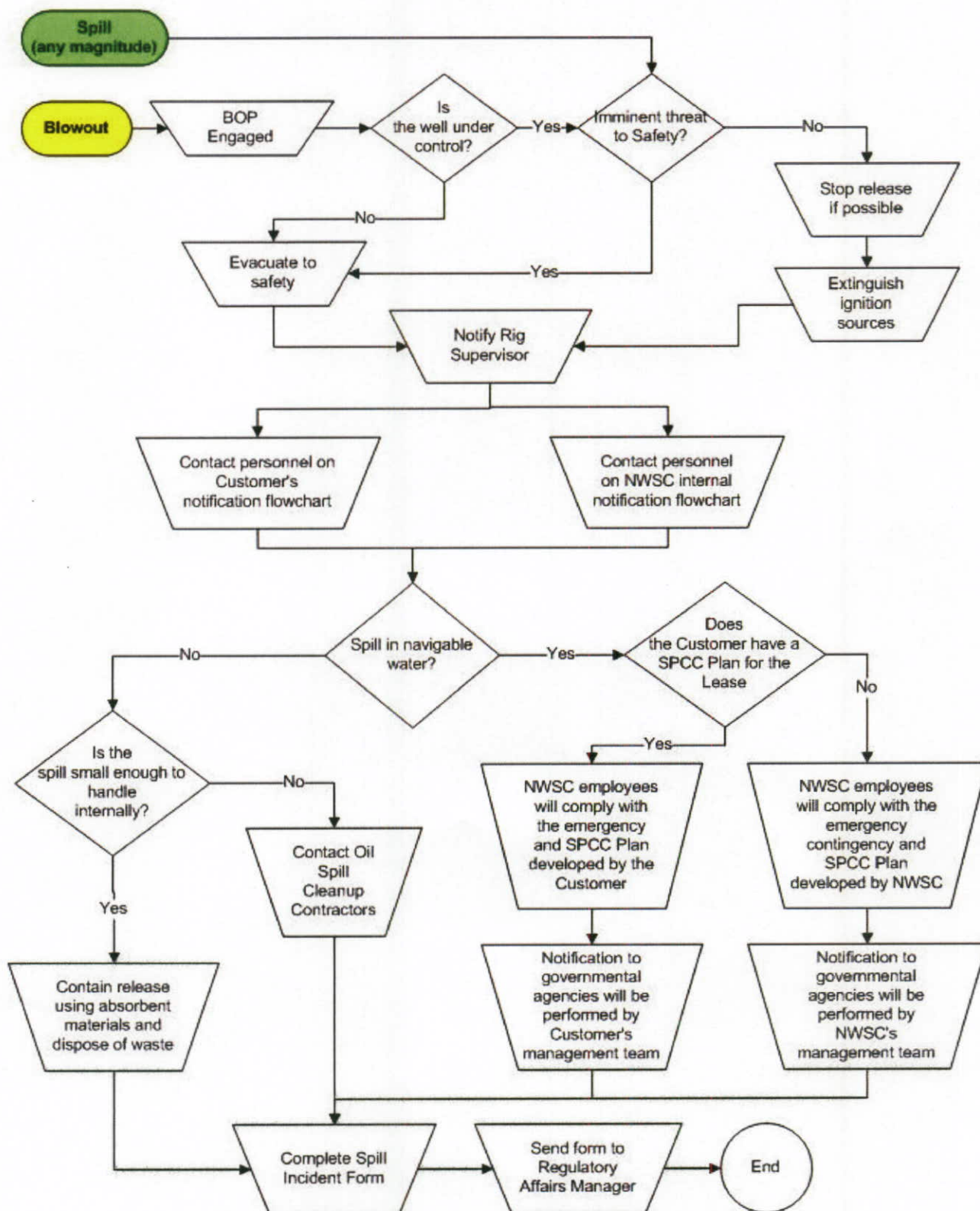
Attachment A Typical Rig Site Footprint



Attachment B

Workover and Production Rig Operations

Emergency Procedures Spill Response Flowchart



**Attachment C
SPILL INCIDENT FORM**

1. Reporter Information:

Name _____

Title _____

Address _____

Telephone Number _____

2. Site Information

Rig Number _____

Location _____

Telephone Number _____

Cause of release _____

Type of material released _____

Time of release _____

Amount of material released _____

Extent of injuries/illnesses (if known) _____

Possible hazards of human health/environment _____

Body of water _____

Action taken or proposed to contain release _____

Other organization notified _____

Rig Supervisor Signature _____

Date _____

Attachment D
OIL SPILL CLEANUP CONTRACTOR (OSCC)

Advanced Cleanup Technologies, Inc

Bakersfield, CA 93308
661-392-7765

Advanced Cleanup Technologies, Inc

Rancho Dominguez, CA 94510
310-763-1423
800-334-2284

Clean Seas LLC

Carpinteria, CA 93013-2000
805-684-3838

Clean Harbors Environmental

Los Angeles, CA 90058
323-277-2500
800-645-8265

Clean Water I

Long Beach, CA 90813
562-436-9994

Consolidated Waste Industries, Inc.

Montclair, CA 91763
909-625-6645
800-788-2167

DECON Environmental

Hayward, CA 94545
510-732-6444

Ecology Control Industries

Ventura, CA 93001
805-648-5123

Hole-Shot Construction & Environmental, Inc

Bakersfield, CA 93308
661-589-5970

MSRC

Long Beach, CA 90802-6247
562-432-1415

Metson Marine

Ventura, CA 93003
805-658-2628

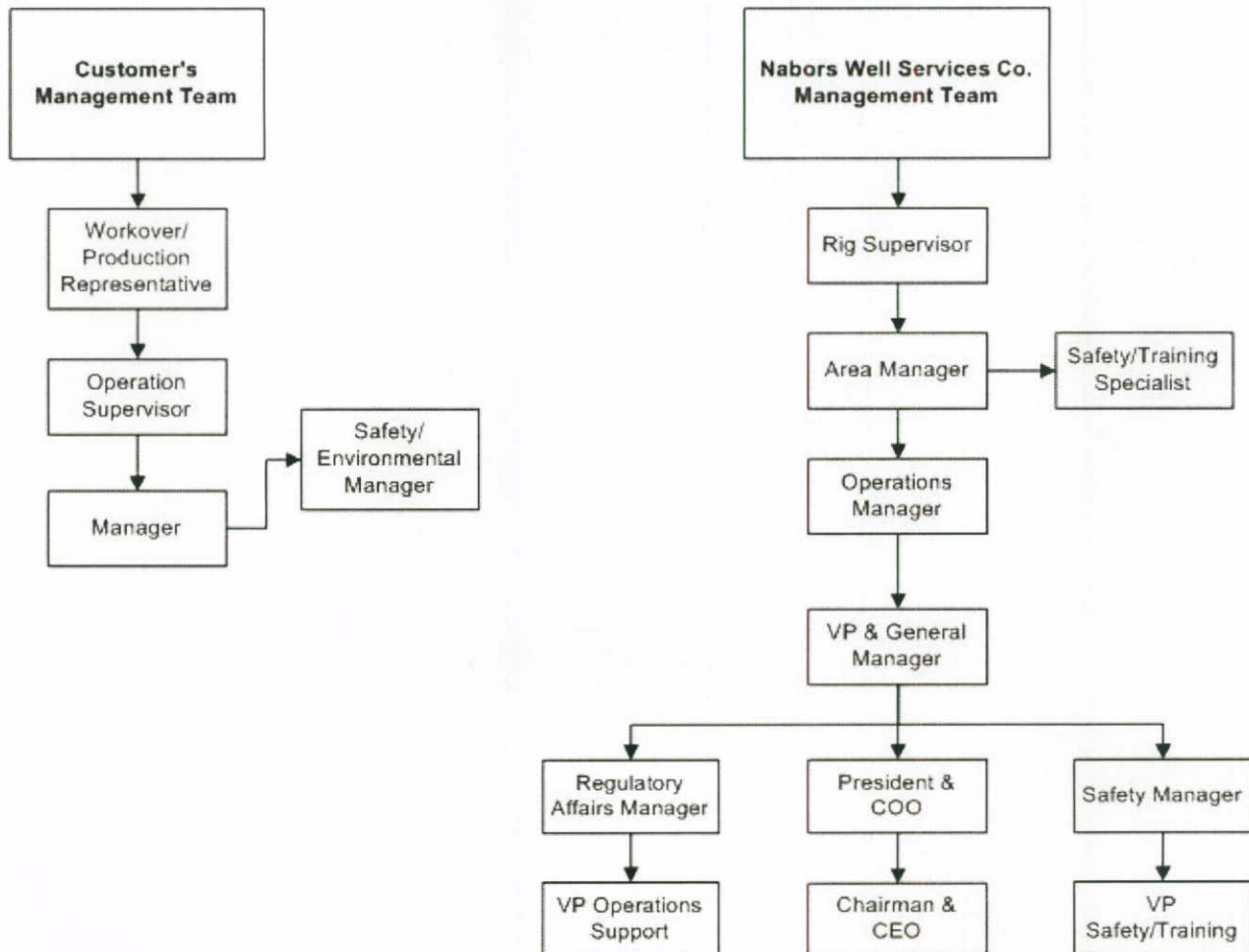
MP Environmental Services, Inc.

Bakersfield, CA 93308
800-458-3086
661-393-1151

Attachment E

Customer & Internal Contact Flowchart

The following represents the general order and responsibility for notification with the customer's management team and with the NWSC corporate structure. Some or all of the personnel listed may be notified, depending on the magnitude of the spill. If a listed contact is unavailable, then attempt to reach the next customer and NWSC contact in the chain of command. Please have as many facts as possible when reporting the release or blowout.



Attachment F

NWSC Contact Phone Numbers for personnel listed on Internal Contact Flowchart.

Dispatch

Rancho Dominguez	310-637-7074
Ventura Onshore	805-648-2731
Ventura Offshore	805-641-0390
Santa Maria	805-928-4353
Kern River	661-392-7660
Rosedale	661-589-3970
Special Services	661-588-6140

NWSC Employees

Operations Superintendent	William Buterbaugh	310-420-9048
Operations Superintendent	Richard Windes	805-207-5510
Area Manager	Troy Auge	661-343-0488
Area Manager	Ron Haire	805-207-5511
Area Manager	Terry Heinz	661-201-5093
Area Manager	George Lusk	661-201-8690
Area Manager	Tim Koppi	661-201-8671
Area Manager	Jeff Rowland	661-343-0482
Area Manager	Vince Smith	661-201-8670
Area Manager	Dennis Wang	310-420-8980
Sr. Operations Manager	Greg Tremain	661-201-7403
Sr. Operations Manager	Joe Deford	661-201-5990
Sr. Operations Manager	Johnny Sanchez	414-731-0261
Safety Manager	Robert Jones	661-343-3894
Regulatory Affair Mgr	James Thomas	661-747-7573
Director Business Dev.	Alan Pounds	661-343-0475
VP & General Manager	Dave Werner	661-747-7606

Attachment G
FEDERAL AND STATE REGULATORY CONTACTS

Federal

EPA National Response Center (800) 424-8802

Regional

EPA Regional 9 (Arizona, California, Nevada) (800) 300-2193

EPA Regional 10 (Oregon, Washington, Idaho) (800) 258-5990

State of California

State Office of Emergency Services (800) 852-7550

West Coast Oil Spill Hotline (800) 645-7911

California Fish and Game Office of Spill Prevention & Response (888) 334-2258

Local Agencies

Kern County

Kern County Environmental Health (661) 861-3636

Kern County Fire Department (661) 324-6551

Fresno County

Fresno County Environmental Health (559) 445-3357

Ventura County

Ventura County Environmental Health (805) 654-2813

Ventura County Fire Department (805) 339-4300

Los Angeles County

Los Angeles County Environmental Health (213) 563-4070

Harbor Patrol (310) 592-5869

Coast Guard Search & Rescue (310) 215-2112

Local Air Districts

Amador County APCD

Jackson, CA (209) 257-0112

Antelope Valley AQMD

Lancaster, CA (661) 723-8070

Bay Area AQMD

San Francisco, CA (415) 749-5000

Butte County AQMD

Chico, CA (530) 891-2882

Calaveras County APCD

San Andreas, CA (209) 754-6504

Colusa County APCD

Colusa, CA (530) 458-0590

El Dorado County APCD

Placerville, CA (530) 621-6662

Feather River AQMD

Marysville, CA (530) 634-7659

Glenn County APCD

Willows, CA (530) 934-6500

Great Basin Unified APCD

Bishop, CA (760) 872-8211

Imperial County APCD

El Centro, CA (760) 482-4606

Kern County APCD Easterly portion of Kern County	(661) 862-5250
Lake County AQMD Lakeport, CA	(707) 263-7000
Lassen County APCD Susanville, CA	(530) 251-8110
Mariposa County APCD Mariposa, CA	(209) 966-2220
Mendocino County AQMD Ukiah, CA	(707) 463-4354
Modoc County APCD Alturas, CA	(530) 233-6419
Mojave Desert AQMD Victorville, CA	(760) 245-1661
Monterey Bay Unified APCD Monterey, CA	(831) 647-9411
North Coast Unified AQMD Eureka, CA	(707) 443-3093
Northern Sierra AQMD Grass Valley, CA	(530) 274-9360
Northern Sonoma County APCD Healdsburg, CA	(707) 433-5911
Placer County APCD Auburn, CA	(530) 889-7130
Sacramento Metro AQMD Sacramento, CA	(916) 874-4800
San Diego County APCD San Diego, CA	(858) 586-2600
San Joaquin Valley Unified APCD Fresno, CA	(559) 230-6000
Bakersfield, CA	(661) 326-6900
Modesto, CA	(209) 557-6400
San Luis Obispo County APCD San Luis Obispo, CA	(805) 781-5912
Santa Barbara County APCD Goleta, CA	(805) 961-8800
Shasta County AQMD Redding, CA	(530) 225-5789
Siskiyou County APCD Yreka, CA	(530) 841-4029
South Coast AQMD Diamond Bar, CA	(909) 396-2000
Tehama County APCD Red Bluff, CA	(530) 527-3717
Tuolumne County APCD Columbia, CA	(209) 533-5693
Ventura County APCD Ventura, CA	(805) 645-1400
Yolo-Solana AQMD Davis, CA	(530) 757-3650