



COGCC form INSTRUCTIONS

Form 2A and FIU Operations Safety Management Program Plan

OPERATIONS SAFETY MANAGEMENT PROGRAM PLAN

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Rule 304.c.(7).

An operations safety management program consistent with the requirements of Rule 602.d.

Rule 602.d.

Operators will establish and maintain a written operations safety management program for all Oil and Gas Operations. The operations safety management program will establish operational practices and procedures for safety and will include at a minimum a:

- (1) Change management program; and
- (2) Pre-Startup safety program for all new and existing Oil and Gas Locations.

Definitions:

Change: means any change in physical means of operation, method of operation, equipment or procedure.

Process: means any activity involving plumbing, repairing, constructing, repurposing or major modifications to oil and gas equipment. This equipment may include, but is not limited to, surface wellhead equipment, flowlines, pipelines, process piping, compressors, separation equipment and tanks.

Purpose of the Plan:

The intention of these rules, and the resulting written Operations Safety Management Program Plan attached to a Form 2A, is to describe how the Operator will prevent potential threats to Public Health, Safety, Welfare and the Environment (PSHWE) from changes made by an Operator at Oil and Gas Locations and Facilities. The Colorado Oil and Gas Conservation Commission (COGCC) believes proper proactive planning, execution, and documentation of changes to processes and equipment will decrease

OPERATIONS SAFETY MANAGEMENT PROGRAM GUIDANCE

the amount of accidents, uncontrolled releases and undesirable events, for both the short term and long term at Oil and Gas Locations and Facilities. Additionally, having a prescribed procedure to follow each time an operational process has been changed or modified or a piece of equipment is placed into operation or removed will help ensure no details have been overlooked that could be detrimental to the overall process or equipment function. The prevention of these unwanted outcomes will assist in protecting the public and the environment.

Operators will operate and maintain all Locations and Facilities in a safe manner. The Operations Safety Management Program written plan must include a list of best management practices (BMPs) describing what the operator will do to comply with these rules. Operators will train their employees in the safe conduct of all job responsibilities, including safe operation and location of all equipment. An Operator will ensure that all contractors, subcontractors, and persons directly under the Operator's control on an Oil and Gas Location or at an Oil and Gas Facility receive adequate training and are aware of the hazards presented by the Operator's Oil and Gas Operations.

The purpose of the Operations Safety Management Program is to provide COGCC with information concerning how an Operator plans, executes, and documents changes to any equipment and/or operational processes at Oil and Gas Locations. The Operations Safety Management Program ensures that there is a prescribed procedure to follow each time a piece of equipment is placed into operation or removed, and when an operational process has been modified or changed. The Operations Safety Management Program has, at a minimum, two key components:

- Change Management Program (CMP): describes how an Operator records changes to technology, equipment, and procedures; and changes to facilities that affect a process.
- Pre-Startup Safety Review (PSSR): describes how the safety and technical review inspection is conducted prior to startup of any new or modified equipment or process at an Oil and Gas Location.

The Operations Safety Management Program is required for all new, amended, and refile Form 2As with equipment. The Form 2A lists numerous types of equipment required to conduct operational processes at the proposed Oil and Gas Location. The Operations Safety Management Plan should describe the program for changing the

OPERATIONS SAFETY MANAGEMENT PROGRAM GUIDANCE

equipment or operational processes and how any new equipment or process is reviewed and considered safe prior to being implemented at the Oil and Gas Location or Facility.

Requirements of the Plan:

The Operations Safety Management Program Plan explains how the Operator will comply with Rule 602.d. This Rule addresses changes made at an Oil and Gas Location or Facility regarding equipment, processes or procedures at start up or anytime equipment or processes are placed into or returned to operation. The CMP and PSSR components help ensure that changes to a process do not inadvertently introduce new hazards or unknowingly increase risk of existing hazards.

The Operations Safety Management Program Plan should document how the operator has developed, implemented and maintains the following minimum requirements for each of the two key components of the program, the CMP and the PSSR.

- 1) Change Management Program (CMP) is a written document that addresses:
 - a) How an Operator records changes to technology, equipment, and procedures; and changes to facilities that affect a process, and identifies:
 - i) where the records are stored;
 - ii) how long records are kept;.
 - iii) how soon after a COGCC request the records can be provided; and
 - iv) how often the records are updated.
 - b) The following must be documented for any change to technology, equipment, and procedures; and changes to facilities that affect a process:
 - i) identify the basis for the proposed change and why it is needed;
 - ii) identify the potential impacts to Public Health, Safety, Welfare, and the Environment:
 - (1) that may occur from implementing the change; or
 - (2) that may occur from not implementing the change;
 - iii) the level at which employees are allowed to approve changes;
 - iv) identify if the change is permanent or temporary; and
 - v) if the change is temporary, provide an estimate of how long the equipment or process will be in service.
- 2) Pre-Startup Safety Review (PSSR)
 - a) Provide a written description of the safety, technical review, and inspection that is conducted prior to startup of any new or modified equipment or process at an Oil and Gas Location or Facility.

OPERATIONS SAFETY MANAGEMENT PROGRAM GUIDANCE

- i) The description may be broad to cover multiple types of equipment and/or processes to capture the general inspection process implemented prior to conducting startup of any new equipment. If an Operator chooses, this section may contain multiple specific PSSRs grouped by equipment and/or process type (tanks, flowlines, etc).
- ii) The PSSR will include a checklist to document how the pre-startup review is conducted. The checklist may be broad to cover multiple types of equipment and/or processes to capture the general inspection process implemented prior to conducting startup of any new equipment. If an Operator chooses, multiple equipment and/or process specific checklists may be provided as examples.

General Notes

The Operations Safety Management Program Plan is not intended to be an Operator's complete procedure of how changing of equipment and/or processes occurs, but merely to identify that there is such a procedure in place, that such changes are documented, and a general overview of how the Operator maintains the procedure. It is not intended to be an Operator's Site Health and Safety Plan (HASP).

COGCC understands that not all Operators may be able to support a formal program. This is usually due to the size of the company. However, Operators can develop a process where documentation such as work orders, work invoices, parts invoices can be maintained for review as needed.

The key points of the Change Management Program are: 1) to document why the change is necessary, 2) to identify if it will impact Public Health, Safety, Welfare, or the Environment, and 3) to ensure the decision being made by the proper staff.