

2. IMMEDIATE RESPONSE ACTIONS AND NOTIFICATION PROCEDURES

This section of the GOSRP provides the general procedures to be followed at the time of an incident. The section is distinctively marked by a RED tab and provides steps for initial response in the form of user-friendly checklists and flow diagrams. Detailed, area-specific checklists and decision guides will be formulated in a similar section of the ASOSRPs.

Immediate actions to be considered and taken by facility personnel are provided in the following checklists and are summarized in the flow diagram in Figure 2-1.

Any employees observing a spill should take the following emergency actions:

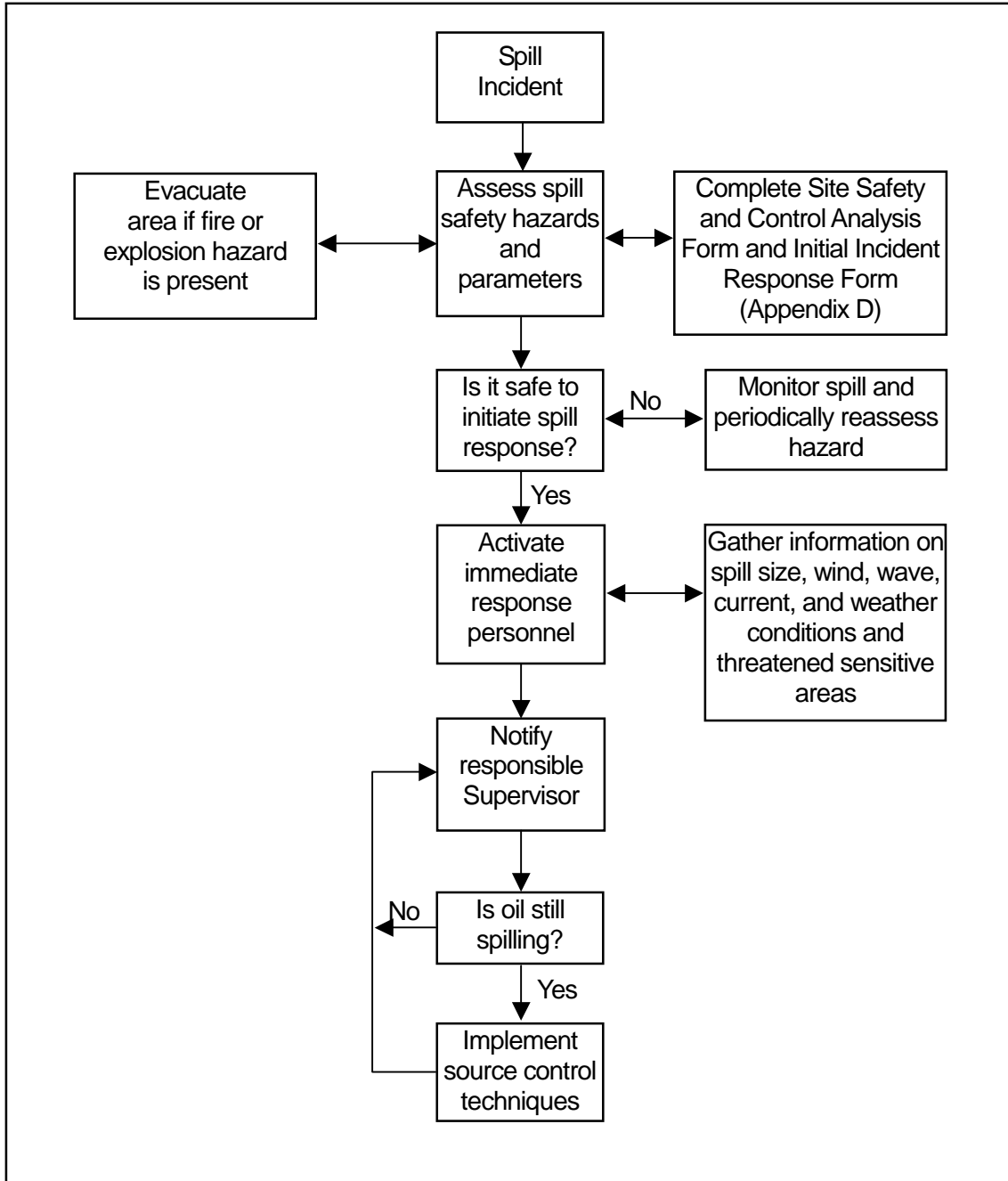
The order of these actions will depend on the situation.

- Ensure safety of personnel in area.
- Stop flow at the source, if safe to do so.
- Eliminate sources of ignition if spill is flammable.
- Notify supervisor of the spill.
- Contain spill if safe to do so.

The Emergency Response Team Leader will initiate the following actions:

- Evacuate area as necessary and confirm that injured personnel, if any, have been attended.
- Confirm identification of spilled material and check the Material Safety Data Sheets (MSDS) emergency procedures.
- Confirm that personnel have been assigned to stop the flow of spilling product and secure leaks if it can be done safely.
- Assess the spill threat, site safety, and parameters such as spill volume, extent and direction of movement.
- Initiate actions to notify government agencies including local authorities of area affected or at immediate threat.
- Establish Exclusion Zone and Safe Work Areas.
- Initiate containment efforts.
- Complete notifications for emergency call-out, as discussed in Section 2.3.1, including government agencies.

Figure 2-1. Emergency Spill Response Process



2.1. Emergency Checklists

2.1.1. Piping Connections

- Stop transfer.
- Ensure safety of personnel in area.
- Eliminate sources of ignition within the immediate area.
- Ensure discharge containment area is holding all spilled oil.
- Notify Supervisor of spill.
- Retighten bolts, drain the hose and renew gasket, or replace faulty hose.
- Pump spilled oil into portable containers for disposal.
- Collect and wipe up residue with sorbents and clean sweep.
- If not immediately contained, secure area and obtain assistance from the Emergency Response Team (ERT).
- Do not re-start transfer until leakage has been stopped.

2.1.2. Pipeline Checklist — Transportation

- Shut down pumping system and isolate pipeline by closing valves.
- Ensure safety of personnel in area.
- Eliminate sources of ignition within the immediate area.
- Cordon off area to prevent personnel or traffic from entering into and spreading oil.
- Notify Supervisor of spill.
- Use sorbents, clean sweep, boom or earth berms to contain spread of spill.
- If not immediately contained, secure area and obtain assistance from the ERT.
- Do not resume normal operations until repairs are made.

2.1.3. Rail Car & Tank Truck Checklist

- Stop fuel transfer (to or from truck or tank car).
- Ensure safety of personnel in area.
- Eliminate sources of ignition within the immediate area.
- Isolate fuel transfer line by closing all valves or using blind flanges.
- Ensure all drain lines to the exterior of secondary containment are closed.
- Cordon off area to prevent personnel or traffic from entering into and spreading oil.
- Notify Supervisor of spill.
- Use sorbents to contain small spill — otherwise secure area and obtain assistance from the ERT.

2.1.4. Crude Oil Storage Tank Checklist

- Stop all transfers (to or from tank).
- Ensure safety of personnel in area.
- Eliminate potential sources of ignition within the immediate area.
- Ensure all drain lines to the exterior of secondary containment are closed.
- Notify Supervisor of spill.
- Cordon off area to prevent personnel or traffic from entering into and spreading oil.
- If possible, transfer tank contents to another tank to lower liquid level below leak.
- Use sorbents to contain small spill — otherwise secure area and obtain assistance from the ERT.

2.1.5. Gasoline Tank Checklist

- Stop all transfers (to or from tank).
- Ensure safety of personnel in area.
- Eliminate all sources of ignition within the immediate area.
- Ensure all drain lines to the exterior of secondary containment are closed.
- Notify Supervisor and Fire Brigade of spill.
- Establish Exclusion Zone and site control to prevent personnel or traffic from entering area.
- If possible, transfer tank contents to another tank to lower liquid level below leak.
- Use sorbents to contain small spill — otherwise secure area and obtain assistance from the ERT and Fire Brigade.

2.1.6. FSO Offtake Transfer Hose Checklist

- Shut down transfer system and isolate line by closing valves.
- Ensure safety of personnel in area.
- Eliminate potential sources of ignition within the immediate area, as much as possible.
- Notify Supervisor of spill.
- Locate apparent source and assess spill size.
- Secure area and obtain assistance from the ERT.
- Do not resume operations until repairs are made.

2.1.7. FSO Hull Failure Checklist

- Stop all transfers (to or from vessel).
- Ensure safety of personnel on vessel.
- Identify location of hull failure and affected tanks.
- Initiate vessel evacuation procedures, if necessary.
- Notify Supervisor of spill.
- Consult with Loading Operator on vessel stability and capability to transfer oil from affected tanks to other slack tanks.
- If no slack space is available, pump water into affected tank(s) to float oil and create water bottom.
- Secure area and obtain assistance from the ERT.

2.2. Steps for Immediate Response Actions

Immediate response actions are listed in the above checklists. After completion of the checklists, responding personnel are to complete the activities listed in Tables 2-1 and 2-2, as applicable. These actions are dependent on whether the incident is a:

- Tier 1 spill — handled by the appropriate Facility ERT,
- Tier 2 spill — requires response from multiple Tier 1 ERTs and possibly regional OSR Cooperatives (e.g., CNA), or
- Tier 3 spill — requires Tier 2 response and outside assistance from ECI and possibly international oil spill cooperatives (e.g., OSRL).

Table 2-1. Actions for Tier 1 Spills

| Step | Action |
|------|---------------------------------------------------------------------------------|
| 1 | Establish spill control and response command |
| 2 | Document the initial spill assessment by completing the Incident Briefing Forms |
| 3 | Complete Tier 1 Notification Procedures |
| 4 | Request facility reconnaissance and/or aerial survey, if needed |
| 5 | Activate ERT and oil spill response equipment (Section 11.2), as needed |

Table 2-2. Actions for Tier 2 and Tier 3 Spills

| Step | Action |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Implement all the steps listed above in the Tier 1 response table |
| 2 | Activate the Tier 2 or Tier 3 notification procedures <ul style="list-style-type: none"> • Notify Occurrence Notification Center • Notify Headquarters, as appropriate • Place on stand-by or activate oil spill response cooperatives (Tier 2) • Call the ECI European/Africa Core Team (Tier 3) |
| 3 | Implement the appropriate Incident Command Structure (see Section 3) |
| 4 | Instruct each response team member to review role checklists (Appendix C) |
| 5 | Document response activities by completing Incident Action Forms (Appendix D) |
| 6 | Activate surveillance and tracking (see Section 5) |
| 7 | Develop incident response assignments and implement |

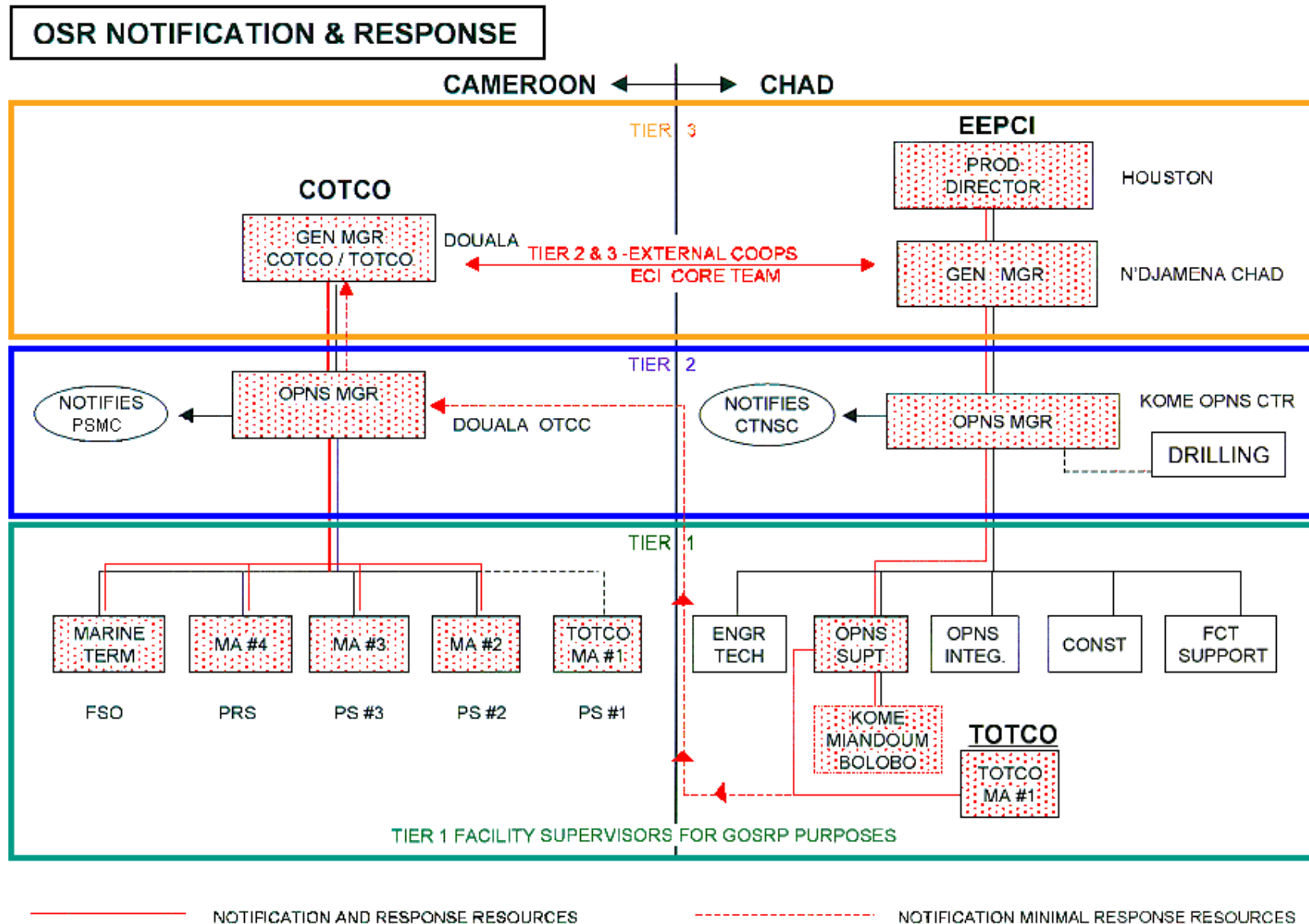
2.3. Notification and Regulatory Reporting

The flow chart in Figure 2-2 overviews the incident notification and reporting requirements. The Initial Briefing Form, IBF 200 (Appendix D) lists the first information to be provided to the responding organization's headquarters and to appropriate government agencies. It is mandatory that this form be used to file the initial report of the incident.

Names and contact information of the ERT personnel, EEPIC Emergency Management Team (EMT), and other affected organizations will be included in annexes to this section once the organization is mobilized and operational (approximately six months prior to start-up). Access to the telephone numbers in these annexes will be limited to the personnel potentially involved in the notification process. An electronic version of these lists will be maintained and updated by the appropriate in-country response organization.

The guidelines provided in the following are not intended to replace good judgment. Notification should occur for significant events not specifically covered in these flowcharts.

Figure 2-2. Incident Notification and Reporting Requirement



2.3.1. Notifications

The Facility supervisors are initially tasked to supervise the initial spill response and are responsible for notifying the appropriate Operations Manager (or his designee). The appropriate Operations Manager(s) shall be immediately notified of every incident that could possibly be reportable, have legal compliance or liability issues, or be of potential public affairs concern.

When reporting an incident, the caller should be prepared to answer the following questions:

- What is the source of the spill? (pipeline, hose, tank, etc.)
- What type of hydrocarbon has been discharged? (crude, diesel, gasoline)
- Where is the spill? (Country, pipeline milepost, nearby population, etc.)
- When was the spill detected? (day, hour, minute)
- Who is involved? (Field or maintenance crew, area ERT, on-lookers, etc.)
- How much has spilled? (barrels, gallons, area covered, etc.)
- What is the spill movement? (contained, on-land, in river, etc.)

Tier 1 Notification

- All initial notifications are made to the appropriate Supervisor (MA, FSO, or OFDA)
- Supervisors are responsible for notifying their Operations Manager. All Cameroon MA Supervisors must notify the Operations Manager, Douala, of a spill. The MA-1 Supervisor will notify Operations Managers both in Douala and Komé. The OFDA Supervisor notifies only the Komé Operations Manager.
- Operations Managers will notify the General Managers and appropriate agencies: National Committee for Technical Monitoring and Supervision (CTNSC) in Chad and Pipeline Steering and Monitoring Committee (PSMC) in Cameroon.

Tier 2 and 3 Notification

Operations Managers will notify their respective General Manager of any spill incident that requires Tier 2 or 3 response. A Tier 2 or 3 spill in Cameroon will entail notification to the COTCO/TOTCO General Manager in Douala. In Chad, a Tier 2 or 3 spill in MA-1 will be notified to both the COTCO/TOTCO General Manager, Douala, and the EEPCI General Manager, N'Djaména. A Tier 2 or 3 spill within the OFDA will entail notification only to the EEPCI General Manager. The latter individual will notify the Production Director (Houston) of all Tier 2 or 3 spills.

- The COTCO/TOTCO General Manager is responsible for notifying and mobilizing any Mutual Aid assistance in region and/or Oil Spill Response Cooperatives (e.g., CNA).
- The EEPCI General Manager will facilitate activation of international spill resources, such as ECI, OSRL, and Technical Advisors.
- The EEPCI General Manager shall notify the Production Director for any spill that is, or threatens to become, a Tier 2 or 3 spill.

Incident Notification

- If a spill is complicated by other external events, these situations are deemed incidents. Incidents are classified by level of severity and potential losses. Table 2-3 provides a description of the four *Incident Levels* used for the Project.
- If there are additional incident factors (e.g. fire and potential financial loss) involved in an incident, the highest incident level should be used to determine notification.
- Incidents classified as Level 1 or above may require implementation of the Houston-based Emergency Response Plan (CMS Procedure 2-5).
- There are two channels for *incident* notification: the Executive and the Public Affairs Channel. For a Level 2/3 incident, immediate notification is required; for a Level 1 incident notification can occur on the next business day. Level 0 Lost Time Incidents are to be reported on the next business day.

2.3.2. Reporting Requirements

Reporting to Government Agencies

Reports of spills, spill response activities planned and undertaken, and post-spill evaluation must be provided to the appropriate in-country oversight agencies:

In Chad: CTNSC

In Cameroon: PSMC

Reporting to ECI by EEPIC

IRAS Reporting

IRAS (Incident Reporting and Analysis System) is a corporate-wide PC database program. The following incidents must be reported to ECI through IRAS:

- All incidents classified as ECI level 0 and above (Table 2-3).
- All medical treatment incidents (MTIs) and related work incidents (RWIs).
- High learning value incidents and near misses: near misses with a potential severity Level 1 or higher, incidents not otherwise reportable with a potential severity Level 1 or higher and any actual event or near miss with significant lessons to be shared.

CMS Procedure 2-5, Appendix 2-4.7 lists ECI requirements related to reporting timing and associated documents.

Table 2-3. Incident Classifications

| MAJOR LEVEL 2/3 | LEVEL 1 | LEVEL 0 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Work related fatalities • Major fires/explosions • Potential loss > \$20M US • Oil spill exceeds affiliate's cleanup capability • Gas/Vapor Release: <ul style="list-style-type: none"> – On-Site: requires site/public evacuation – Off-Site: toxic or requires public evacuation • Probable extensive publicity in International or major US News, public evacuation, or major damage <p>Extensive government action</p> | <ul style="list-style-type: none"> • Multiple Lost Time Incidents • Fires/Explosions • Potential loss \$1M – \$20M US • Oil spill within affiliate's cleanup capability: <ul style="list-style-type: none"> – In Water : > 1 bbl – On Land : > 600 bbls on-site ≥ 10 bbl off-site • Gas/Vapor Release: <ul style="list-style-type: none"> – On-Site : toxic – Off-Site : ≥ 5 kg – non-toxic, contained/handled locally • Well control incident > 24 hours <p>Probable in-country media coverage, moderate public inconvenience or govt. involvement</p> | <ul style="list-style-type: none"> • Single Lost Time Incident • Minor fires/explosions • Potential loss \$25K – \$1M US • Oil spill within affiliate's cleanup capability: <ul style="list-style-type: none"> – In Water: < 1 bbl – On Land: ≥ 10 bbl • Gas/Vapor Release: <ul style="list-style-type: none"> – On-Site: ≥ 5 kg hydrocarbon (non-toxic) – Off-Site: < 5 kg hydrocarbon (non-toxic) • Well control incident ≤24 hours <p>Incident with minimal public disruption or govt. involvement</p> |

ANNEX 2-A. EEPIC Emergency Contact List*

| | Name | Phone |
|---------------------------|------|-------|
| GENERAL MANAGER | | WORK |
| | | HOME |
| | | PAGER |
| OPERATIONS MGR. | | WORK |
| | | HOME |
| | | PAGER |
| OPERATIONS SUPERINTENDANT | | WORK |
| | | HOME |
| | | PAGER |
| KOME FIELD SUPERVISOR | | WORK |
| | | HOME |
| | | PAGER |
| MIANDOUM FIELD SUPERVISOR | | WORK |
| | | HOME |
| | | PAGER |
| BOLOBO FIELD SUPERVISOR | | WORK |
| | | HOME |
| | | PAGER |
| COTCO/TOTCO GENERAL MGR. | | WORK |
| | | HOME |
| | | PAGER |
| PRODUCTION DIRECTOR | | WORK |
| | | HOME |
| | | PAGER |

* Example list — actual to be provided at time of organization mobilization.

ANNEX 2-B. COTCO/TOTCO Emergency Contact List*

| | NAME | PHONE |
|-------------------------------|------|-------|
| GENERAL MANAGER | | WORK |
| | | HOME |
| | | PAGER |
| OPERATIONS MGR. | | WORK |
| | | HOME |
| | | PAGER |
| MARINE TERMINAL SUPERVISOR | | WORK |
| | | HOME |
| | | PAGER |
| MA-1 SUPERVISOR | | WORK |
| | | HOME |
| | | PAGER |
| MA-2 SUPERVISOR | | WORK |
| | | HOME |
| | | PAGER |
| MA-3 SUPERVISOR | | WORK |
| | | HOME |
| | | PAGER |
| MA-4 SUPERVISOR | | WORK |
| | | HOME |
| | | PAGER |
| EEPCI GENERAL MANAGER | | WORK |
| | | HOME |
| | | PAGER |
| PRODUCTION DIRECTOR | | WORK |
| | | HOME |
| | | PAGER |

* Example list — actual to be provided at time of organization mobilization.