



COLORADO OIL AND GAS CONSERVATION COMMISSION

EMERGENCY RESPONSE PLAN

Document Control:

Created and Finalized Date:	January 13, 2015
Last Updated Date:	January 13, 2015
Last Updated By:	Dave Kulmann
Review Cycle:	Yearly Review
Systems Used:	COGCC Databases, State's WebEOC
Document Owner:	Dave Kulmann

I. Purpose and Scope

A. Purpose

The purpose of this plan is to define the actions and roles necessary to provide a coordinated emergency response within the Colorado Oil and Gas Conservation Commission "Commission". The plan will establish roles within the Commission during and following an emergency. The plan will also define communication mechanisms, timing, and contacts. Finally, the plan will provide checklists in the appendix to use during an emergency to help guide the Commission's actions. The plan provides for a systemic integration of emergency resources when activated and does not replace other state, county, or local emergency operations plans or procedures.

B. Scope

The plan applies to emergencies in the state of Colorado that impact oil and gas operations. Emergencies can range from statewide issues to local issues and may include events such as floods, fires, tornados, severe thunderstorms, high water, drought, high winds, and accidents. Emergencies can include formal emergencies declared by the Governor or local government or can include significant events impacting oil and gas operations that the Commission Director declares as an emergency thereby implementing this plan.

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II. Roles during an Emergency

A. Commission's General Roles during an Emergency

During an emergency that impacts oil and gas operations, the role of the Commission is as follows:

- Direct oil and gas operators to take actions as required to protect the public health, safety, and welfare along with the environment and wildlife from oil and gas impacts.
- Gather information from operators, internal Commission resources, local jurisdictions, and state and federal agencies on status of oil and gas operations impacted and actions being taken.
- Disseminate information to impacted local jurisdictions, state agencies, and federal agencies as directed below.
- Provide expertise and advice regarding oil and gas operations as required.

The Commission does not act as first responders or in a search and rescue role. Those functions are within the scope of local emergency responders.

A full commission structure organizational chart is listed in Appendix C. The below highlights key roles.

B. Commission Director

The Commission Director will perform the below tasks during an emergency. Any of the below tasks may be delegated to the Deputy Director as required.

- Officially declares this plan activated and sends a notice to oil and gas operators, local jurisdictions, state agencies, and federal agencies of such declaration.
- Ensures all areas of oil and gas impact are included in a state or local emergency declaration.
- Identifies and formally assigns a Commission's Department Operation Center (DOC) coordinator for the emergency.
- Identifies and formally assigns Commission Emergency Coordinators (CECs).
- Establishes media protocols and approves all releases to the media with Department of Natural Resources' Public Information Officer (DNR PIO).
- Approves appropriate Commission technical staff to assist.
- Receives all requests for Commission assistance from state and federal agencies and assesses with DOC Coordinator.

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- Leads all communication with Governor's office and with the Executive Director's office.
- Ensures continuation of Commission day to day business.

C. Department Operation Center Coordinator

The Commission will select, and appropriately train, at least four Commission employees to perform the duties of Department Operation Center (DOC) Coordinator and once an emergency is declared one person will be selected as the DOC Coordinator for the duration of that emergency. The DOC Coordinator will lead the efforts of the emergency related to oil and gas operations and will report directly to the Commission Director for the duration of the emergency. The following are the key roles of the DOC Coordinator:

- Maintains overall control and coordination of COGCC responsibilities during the emergency.
- Ensures that the Information Lead communicates data to local jurisdictions, state agencies, and federal agencies per regular schedules.
- Directs staff working the emergency ensuring all required information is gathered by staff working under the Field Operations Lead and Information Lead.
- Reviews all recommended releases of data (media, public, notice to operators).
- Updates Commission Director, Deputy Director, DNR PIO and others as required.
- Updates the Governor as required.
- Updates other state agencies and federal agencies as required.
- Ensures staff is provided with necessary health and safety equipment and all required supplies.
- Works with technical staff to develop and approve operational plan.
- Creates a job safety assessment for the specific event and reviews with all Commission staff working the emergency prior to mobilization.

D. Field Operations Lead

When deemed safe and after the job safety assessment, Commission Field Inspectors and Environmental Staff will travel to impacted oil and gas locations to gather data and assess the situation and issues present on location. All data gathered will be input into the Commission database and used as part of the daily reports sent to local jurisdictions, state agencies, and federal agencies.

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The Field Operations Lead will take direction from the DOC Coordinator during the emergency and will perform the following:

- Manages the direction of field inspectors, Environmental Staff, and Engineering Staff working the incident.
- Works with DOC Coordinator and Information Lead to determine areas of concern and responsibilities.
- Dispatches Field Inspectors and Environmental Staff to inspect locations as required after job safety assessment is performed.
- Receives information from Field Inspectors and Environmental Staff and ensures the data is input accurately into Commission databases timely and coordinates with Information Lead.
- Coordinates with the local incident command center to ensure knowledge sharing.

E. Information Lead

The Information Lead will take direction from the DOC Coordinator during the emergency and will perform the following functions:

- Oversees management of all incoming data.
 - CECs for local governments and operators.
 - Field Operations Lead for all internally gathered data.
 - Takes the lead with other state and federal agencies related to information.
- Verifies incoming data is accurate and complete with no duplication.
- Ensures data from operators and Field Operations Lead is received timely and communicated out to local jurisdictions, state agencies, and federal agencies per regular schedules.
- Provides GIS and mapping expertise to develop timely and accurate maps.
- Coordinates with the state and local GIS damage assessment teams.
- Maintains records of all data received.

F. Commission Emergency Coordinators

The Commission will select, and appropriately train, at least six Commission employees to become Commission Emergency Coordinators (“CEC”). During an emergency, a subset of these CECs will be selected to fulfill this role with assigned geographical areas. Their names and phone numbers will be posted on the Commission website and sent out to Operators via a Notice to Operators. CECs will report to the Information Lead during the emergency.

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During the emergency, all contact, communication, questions, and provided information to and from the Commission with local government emergency coordinators and operators within that geographic area will go through these CECs.

CECs will receive the required data daily from operators via spreadsheets and will import that data into the Commission database.

One CEC will house inside the local government's emergency operations center if requested.

G. Finance Officer

The Finance Officer will take direction from the DOC Coordinator during the emergency and will perform the following:

- Works directly with the DOC Coordinator to determine financial needs and requirements.
- Maintains financial records regarding event expenses.
- Prepares purchase orders and works with Hearings and Enforcement group to develop orders in cases where Environmental Emergency Response Fund monies will be used.
- Provides information on expense coding to Field Team Lead.

III. Information Gathering Requirements

A. Required Information from Operators

Table 1 lists the information that the Commission will require from impacted Operators during an official emergency or significant event impacting oil and gas operations. This information must be provided to the Commission daily by 10:00AM starting when the Commission declares this until such time that the Commission declares it over. If significant changes occur on a day after the report is submitted an updated filing for that day should occur after discussion with the assigned CEC.

Table 1 lists the required fields for this daily report. Each location/well will be one row in the spreadsheet template. Information must be provided by Commission facility number for facilities and API number for wells. If no Commission facility number exists, Operators must use the closest API number and note that in the "Additional Comments" field.

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Table 1 Required Information From Operators

Required Field	Values	Pre Populate
Date of Report	Date and time report is submitted	
Facility Name/Well Name	Text	Y
Location Number/Well API Number	Number	Y
Facility Type	Well, Tank, Separator	
Township and Range	Text	Y
Section	Text	Y
Quarter Quarter	Text	Y
Operator Name	Text	Y
Contact Name and Phone	Text	
Drilling or Completion Activity in Progress	Yes, No	
Location Status	Shut in, Producing, Secured, Activity Stopped, Back Online	
Date of Above Activity Status	Date	
Known Spills	Yes, No	
Estimated Spill Quantity	Number in barrels / Unknown	
Known Equipment Damage	Yes, No	
Damage Level	Tier 1, Tier 2, Tier 3, Tier 4	
County	Drop down of 64 Counties	Y
Municipality (If applicable)	Text or Drop Down	
Change From Last Submitted Report	Yes, No	
Additional Comments / Steps Taken	Text	

These daily reports from operators will be kept confidential until the emergency is declared over. All spill numbers will be considered estimates until the emergency is declared over and final numbers are provided.

B. Commission Information Gathering

The Commission will gather data independent from Operators through Commission Field Inspectors, Environmental Staff, conversations with local jurisdictions, federal agencies local emergency responders, and through remote sensing operations such as satellite imaging and aerial photography. Critical and relevant information gathered by the Commission will be communicated to local jurisdictions, state agencies, and federal agencies as directed below.

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IV. Communication Requirements

A. Communication with Local Jurisdictions

The Commission will provide the information listed below to impacted County Local Government emergency coordinators at least once a day during the emergency via the state's Web EOC system and through email:

- Operator provided information listed above.
- Information on Commission inspector work performed within their jurisdiction.
- Reports filed by Commission inspectors within their jurisdiction.
- Coordination efforts related to GIS mapping.
- Known significant upcoming events or activities.

Information could then be sent from the County emergency coordinators to other districts such as fire districts, as required and as determined by the County emergency coordinators.

CECs will also gather status and potential threat information from local emergency coordinators and the Commission will disseminate such information to state and federal agencies as needed.

All County local government emergency authorities are documented on the Colorado Emergency Management's website located below. These contacts will be used by the Commission during an emergency to communicate information.

<http://www.coemergency.com/p/local-info-sources.html>

Furthermore, Commission staff will build and maintain relationships with many of the County emergency authorities. These relationships will be maintained through the following:

- Quarterly e-mails and semiannual phone conversations.
- Annual face to face meetings between these contacts and CECs.
- CECs attending local emergency coordinator regularly scheduled meetings.
- CECs and COGCC staff attending monthly Regional Field Managers' meetings.
- CECs and COGCC staff attending multi-agency coordination (MAC) meetings.
- COGCC management attending the annual Colorado emergency management conference and annual LEPC conference.
- Participation in joint table top exercises.

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B. Communication with State and Federal Agencies

The Regional Field Managers, within the State's Division of Homeland Security & Emergency Management, help local governments to achieve their emergency management goals by providing technical assistance with respect to strategic planning, emergency plan development, community preparedness, disaster recovery, hazard mitigation and training and exercise support. The state has nine regions as depicted in appendix E and listed below. The Commission staff will focus on building and maintaining relationships with these Regional Field Managers.

Area	Name	Phone	e-Mail
North Central Region	Cory Stark	720-852-6618	Cory.stark@state.co.us
South Central Region	Paul Eller	303-870-6893	Paul.eller@state.co.us
Southwest Region and Tribal Nations	Trevor Denney	970-247-7674	Trevor.denney@state.co.us
San Luis Valley Region	David Osborn	719-587-5213	David.osburn@state.co.us
West Region	Drew Petersen	970-633-0201	Drew.petersen@state.co.us
South and Southeast Regions	Riley Frazee	719-510-2388	Riley.frazee@state.co.us
Northeast Region	Kevin Kuretich	970-867-4300	Kevin.kuretich@state.co.us
Northwest Region	Chuck Vale	970-846-3912	Chuck.vale@state.co.us

<http://dhsem.state.co.us/emergency-management/field-services>

In addition, below are the other state and federal agencies that the Commission will communicate with during an emergency impacting oil and gas operations.

Agency	Name	Phone	e-Mail
DNR PIO	Todd Hartman	303-866-3311 x 8665	Todd.hartman@state.co.us
CDPHE Office of Emergency Preparedness and Response			
Department of Public Safety			
Colorado Parks and Wildlife	Gary Thorson	303-291-7227	Gary.thorson@state.co.us
BLM Colorado State Office	Barry Oelrich	719-214-1915	boelrich@blm.gov
EPA Region 8	Barb Nisley	303-312-6558	Nisley.barb@epa.gov
Southern Ute Indian Tribe	Kathi Gurule	970-563-0100 x 2449	kgurule@southern-ute.nsn.us

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The below is information that the Commission will provide to these State and Federal Government contacts at least once a day in the afternoon during the emergency via the state's Web EOC system and through email:

- Operator provided information listed above.
- Information on Commission inspector work performed statewide.
- Known significant upcoming events or activities.
- Information provided to the Commission from Local Governments and other State or Federal agencies.

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V. Appendices

A. Beginning of an Emergency Checklist

Date Emergency Declared:	
Date Emergency Officially Ended:	

Item	Responsibility	Date and Time Completed
Has a DOC Coordinator been appointed?	Commission Director	
Has a CEC been assigned to each impacted area and communicated out to all impacted parties including local jurisdictions, state agencies, and operators and posted on the website?	Commission Director	
Has the media protocol been established?	Commission Director	
Has appropriate Commission Technical Staff (Engineering, GIS, Environmental) been assigned to assist with gathering required information?	Commission Director	
Has a formal notice been sent out to all operators regarding a declared emergency and to reiterate the reporting requirements and timing?	Commission Director	
Has the internal reporting system been tested to ensure it is working appropriately?	Commission Director	
Has an assessment been done on whether additional health and safety equipment or vaccinations are required for Commission staff per the safety checklist?	DOC Coordinator	
Has the interface with the state's WebEOC program been verified?	Director or DOC Coordinator	
Have all local emergency coordinators been contacted to establish initial communication, determine status of their emergency operations center, and determine protocols?	CEC	
Has the state's WebEOC protocol been confirmed with the local emergency coordinators?	CEC	
Has it been established whether the local jurisdictions want the CEC housed locally?	CEC	

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B. Commission Database Requirements

The Commission will develop an eForm to help facilitate rapid and easy input of Operator information listed in section III.A into the Commission's database.

The following will occur related to updating the Commission's database to facilitate data gathering:

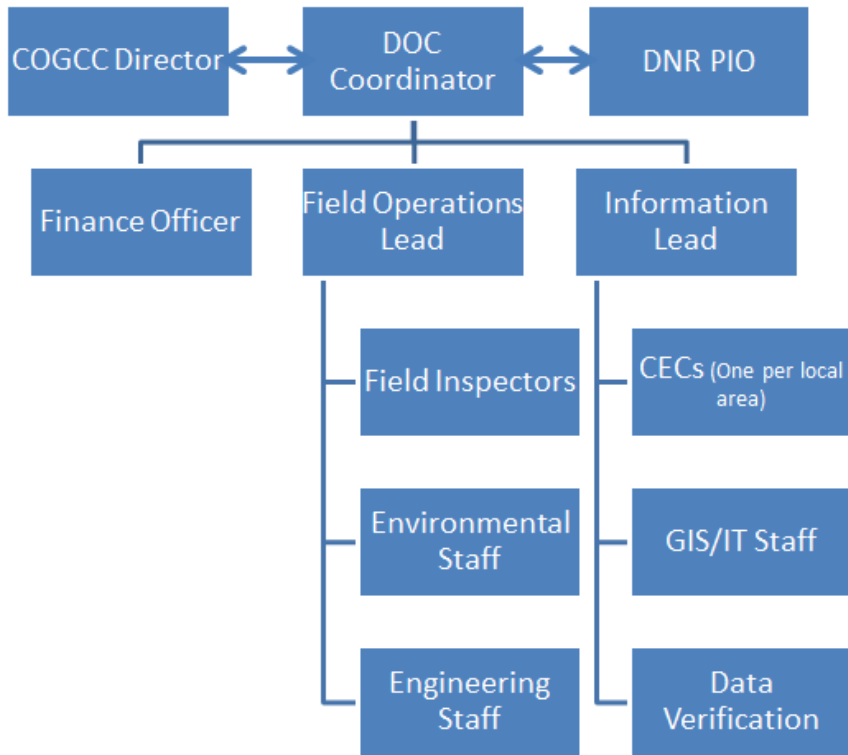
- Develop an emergency reporting spreadsheet template that includes the fields listed in section III.A above.
- Allow Operators to download this spreadsheet template from the eForm system. Operators should be allowed the following download options:
 - Download a blank spreadsheet template.
 - Download a spreadsheet template with basic information pre-populated for a list of provided location numbers/well numbers.
 - Download a spreadsheet template with the basic information pre-populated for all of the Operator's locations within selected townships and sections.
 - Download a spreadsheet template with the basic information pre-populated for all of the Operator's locations within a Commission defined impact area.
- Operators will send the data back to the CECs who will load the data from the spreadsheets into the COGCC database.
- Operators should include all impacted locations in the daily report even if the status did not change. The field titled "Change from Last Submitted Report" will be used to pull out daily changes.
- Develop a report that will only pull the latest submittal for all Operators.

Additionally, the below are the definitions of the four tiers related to damage level.

- Tier 1 – Spill has occurred or equipment is no longer operational without repairs.
- Tier 2 – Spill is likely in the near future if not repaired or equipment is no longer operating to the effectiveness required.
- Tier 3 – Moderate damage with no spill risk and equipment can still operate as required.
- Tier 4 – No damage or unaffected.

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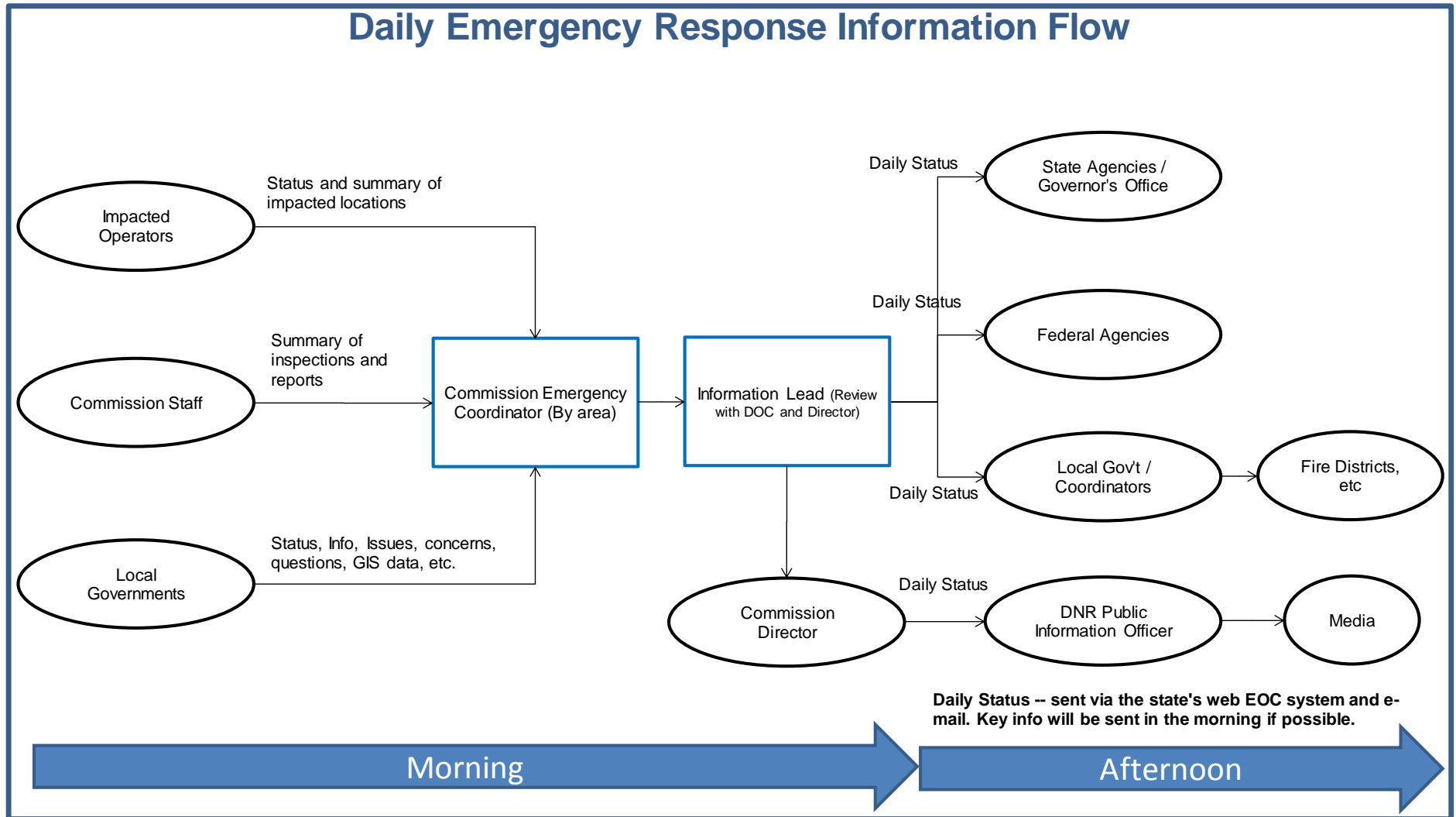
C. Commission Structure during an Emergency



Only staff assigned to the incident are included in this organizational chart

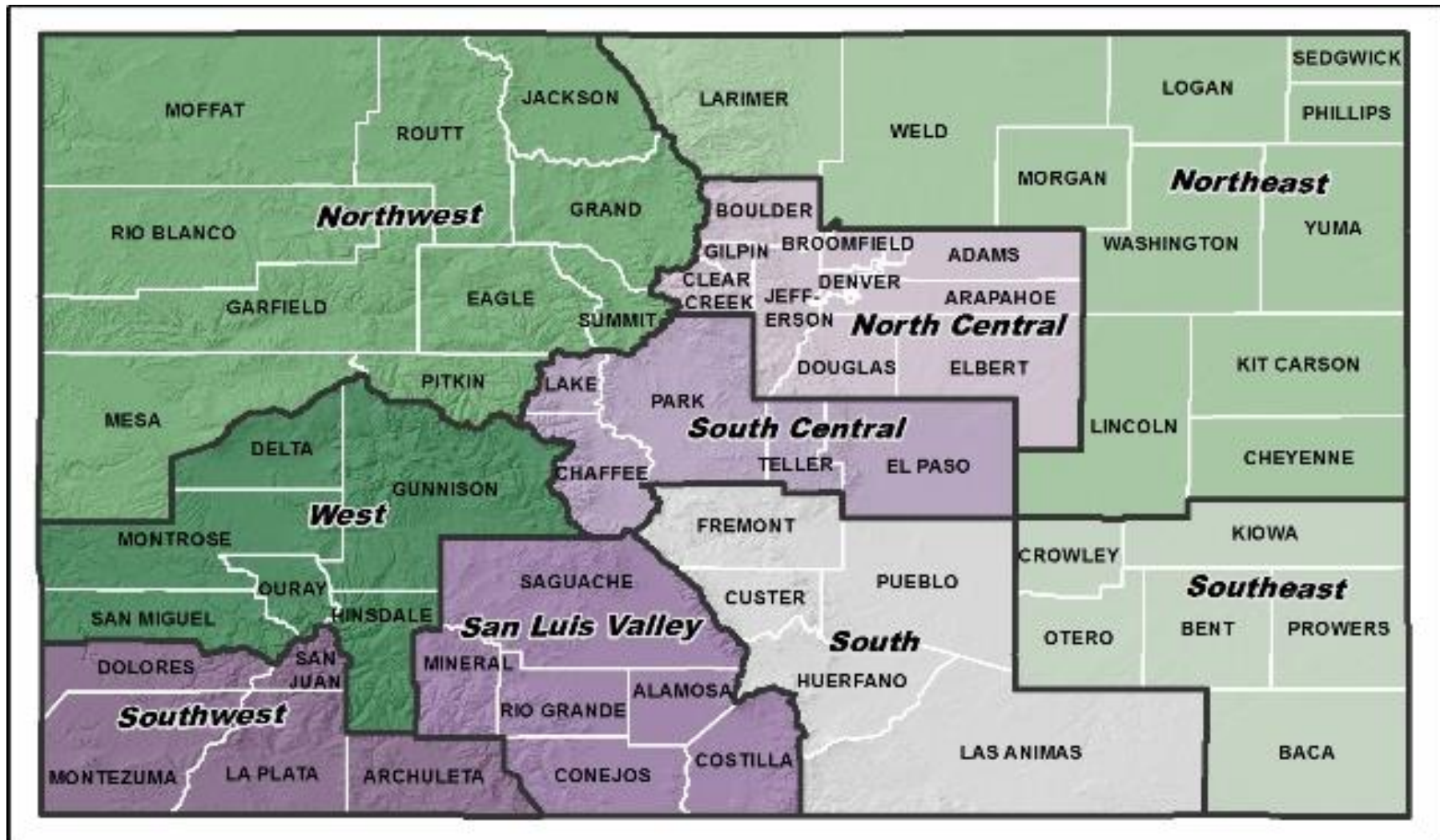
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D. Daily Information Flow during an Emergency



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E. Map of Colorado's Regional Emergency Field Offices



<http://dhsem.state.co.us/emergency-management/field-services>