2.2 Materials Handling and Spill Prevention Procedures and Practices

Materials Handling and Spill Prevention Procedures and Practices implemented for material handling and spill prevention of materials used, stored, or disposed of that could result in discharges causing pollution of surface waters. These procedures or practices are as follows:

During drilling and work over operations Timber Creek Operating drilling contractors are responsible for Spill Prevention Control and Countermeasures (SPCC) plans for each drilling location if necessary. Once the location is in production, Timber Creek Operating implements SPCC planning through an in-house system if needed. Timber Creek Operating personnel are trained on the requirements of the SPCC Plan and spill response during new hire training and then annually thereafter. If a spill occurs during drilling or work over activities, contractors are instructed to notify a Timber Creek Operating Supervisor immediately. If the spill or leak can safely be contained from migrating, employees/contractors are instructed to do so. The spill should be contained and resources for spill cleanup employed. Responsibility for agency notifications depends on spill volume and reportable quantities and will be reported by local EHS staff.

- Exempt, Non-exempt wastes and petroleum products used during drilling and workover operations on location should be limited to fuel, lubricants, drilling fluids and other approved chemicals. Safety Data Sheets (SDS's) for the materials will be maintained on site by the drilling contractor during drilling and work over operations.

The following will be the methods for preventing storm water contamination from materials used on site.

- Fuel storage tanks stored on the project site shall have some form of secondary containment.
- Dry drilling materials will be stored on pallets and covered to avoid contact with precipitation, storm water and wind. Liquid drilling materials or equipment lubricants will be stored on pallets in some form of secondary containment such as temporary soil berms.
- Wastes generated from materials imported to the construction site will be removed and disposed in a timely fashion, including sanitary sewage facilities (typically portable). No wastes or imported materials will be buried, dumped or discharged on site.
- Sanitary facilities will be located away from drainage areas, inlets and areas of high traffic. Portable sanitary sewage facilities will be secured to portable trailers or otherwise stabilized to prevent discharge as a result of being blown or knocked over. Sanitary sewage waste will be properly disposed of by a licensed and approved sanitary/septic waste hauler.
- In case of a hydrocarbon leak or spill, containment strategies will be implemented to control the release. Containment strategies will include, but are not limited to, utilization of spill kits, creation of diversion ditches and containment berms and removal of free liquid by vacuum truck. Hydrocarbon contaminated soils will be properly managed and

remediated to prevent contact with storm water until removed for proper disposal. The proposed BMP's implemented for erosion and sediment control will aid in the retention of spills or leaks. The use of secondary containment and inspections of equipment for leaks will also reduce the likelihood of spills or leaks.

- In case of a dry drilling material release, the affected soil will be removed and temporarily stored in a sealed container to prevent contact with storm water until removed for proper disposal. If a release occurs, prompt cleanup is required to minimize any commingling of waste materials with storm water runoff.