ConocoPhillips

EXHIBIT - 06

WASTE MANAGMENT PLAN

"FLUID DISPOSAL PLAN"

FIELDWIDE -NIOBRARA-

Table of Contents

Authority and Revisions

The Niobrara Waste Management Guide has been prepared by ConocoPhillips Company (COP). It is authorized for use by staff and contract personnel at COP facilities in the Niobrara.

The goal is to provide practical, accurate, and consistent guidelines that ensure compliance with applicable regulations and company policies. It is not expected that everyone is to become regulatory experts. However, the expectation is to use tools such as this document, and its associated training program, to make sound decisions in the workplace. Most importantly, contacting the supervisor and interfacing with RBU HSER is expected if there are any questions about waste management, waste minimization, or recycling.

This document will be periodically reviewed and revised as needed to reflect changing regulations, policies, and practices. The review team will solicit input and feedback from each operating area. Suggestions for changes, clarifications, or additions are welcome.

1 Introduction

The "Niobrara Waste Management Guide" provides guidelines and minimum requirements for waste management according to the Waste Management Corporate Standard, the Lower 48 HSE Management System, as well as state and federal laws. The guide is designed to reduce the impact of company operations on the environment and maintain compliance with company policy and regulatory requirements for waste management.

1.1 Description of Guide

This Waste Guide identifies waste management requirements for common wastes generated by the Niobrara operations (operations). It has been written with a field perspective, to provide guidance for field, staff personnel and contractors who handle and dispose of common waste materials.

This Guide:

- Supports regulatory compliance and protection of the environment;
- Provides the basis for handling and disposing of common E&P wastes at the asset;
- Is a basis for training of field personnel;
- Is consistent with applicable ConocoPhillips policies and procedures;

The Guide will not provide guidance on all waste handling issues but is designed to cover the common waste issues and waste streams identified for operations. Non-routine waste handling situations should be referred to the RBU Environmental Coordinator**.**

Individual waste guidance for handling and disposal of specific wastes encountered by operations is provided at the end of this document in Appendix ii.

The following information is provided for individual waste material:

- Practical Description of Waste
- Waste Category
- Waste Characterization
- Handling Practices
- Waste Minimization and recycling information
- Disposal Practices
- Transportation
- Recordkeeping and documentation

1.2 Responsibilities

Waste management should be included in the planning process for all projects and activities. Inadequate waste management planning, such as management of waste on-site or where to dispose of waste, can have costly consequences. Company personnel are responsible for the proper identification, handling and storage of wastes, both at the facility and throughout the shipment process. Waste can only be disposed of at approved disposal or recycling facilities. Contractors are an integral and essential part of ConocoPhillips operations and are under direct management of COP. Contractors and third parties may not bring any waste materials generated outside field boundaries into COP facilities for disposal, recycling, or beneficial reuse without prior written approval. Similarly, contractors and third parties must take waste materials generated on COP facilities off site for disposal. In general, the waste generated by contractors, in the course of

performing their work, such as partially empty or empty paint cans, aerosol containers, used oil, chemicals, sand blasting material, etc., must be removed and disposed of by the contractor.

1.3 Rules and Regulations

Information contained in this Guide is based primarily on regulations and policies of the U.S. Environmental Protection Agency (EPA), the U.S. Bureau of Land Management (BLM), Colorado Department of Public Health and Environment (CDPHE), and the Colorado Oil and Gas Conservation Commission (COGCC).

The EPA enforces regulations at a Federal level. These regulations include the following waste regulations: the Resource Conservation and Recovery Act (RCRA) *(codified at 40 C.F.R. 239 – 299),* which oversees the management of hazardous wastes, the Exemptions of Oil and Gas Exploration and Production Wastes, and the proper management of Oil and Gas Exploration and Production hazardous waste *(40 C.F.R. 261.4 (b) (5*)). Regulations governing hazardous wastes are in 40 CFR beginning at part 260.

The Colorado Department of Public Health and Environment, the Hazardous Material and Waste Management Division (HMWMD) protects the health and environment of Colorado by ensuring proper management of solid and hazardous waste. The MHWMD encompasses: Hazardous Waste Permitting and Corrective Actions, Inspection and Compliance, Orphan Sites, Solid Waste, Storage Tanks, and the Voluntary Remediation Program.

The Colorado Oil and Gas Conservation Commission (COGCC) 900 series rule outlines practices for managing E&P wastes, including pits, spill response and reporting, produced water, drilling fluids, and oily waste.

Typically, when dealing with waste in a unitized area the CDPHE has primary jurisdiction. There is a Memorandum of Agreement (MOA) between the CDPHE and COGCC with the purpose of defining and clarifying the roles and responsibilities of the two agencies. For example, crude oil spill reporting and remediation would fall under the jurisdiction of the COGCC, diesel spill response and remediation would fall under the jurisdiction of the CDPHE.

This document identifies applicable waste regulations, policies and requirements on the management practices for common waste streams that could be generated by ConocoPhillips operations. Since the laws governing waste are regulated by numerous agencies and are somewhat complex, it would be difficult to address every waste and situation in this document. Please consult the Environmental Coordinator when an unfamiliar waste situation arises or if there is a new waste to be managed. The Coordinator should also be contacted if there are changes to an existing waste stream or if an alternative waste disposal option is needed. This will help ensure that regulatory requirements are reviewed, and compliance is maintained.

Since waste disposal, recycling, and reuse activities are subject to complex environmental laws, violations of these laws may lead to enforcement actions. Criminal or civil enforcement may be directed against individuals performing waste disposal or reuse operations and/or their supervisors. In addition, civil enforcement actions may also be directed against ConocoPhillips Company. Be sure you understand the waste disposal requirements before disposing of waste materials.

1.4 When a waste is E&P Exempt

Under RCRA, certain wastes generated by the oil and gas exploration and production industry are given a special treatment (exempt) status from hazardous waste regulations. A useful reference for this exemption is EPA Publication Exemption of Oil and Gas Exploration and Production Wastes from Federal Hazardous Waste Regulations *(http://www.epa.gov/osw/nonhaz/industrial/special/oil/oil-gas.pdf)*.

Under no circumstances should Exempt or Non-Exempt Waste be commingled with known hazardous waste. Consult with BU or Asset Environmental Representatives on questions concerning disposal.

1.4.1 Exempt Wastes

Certain E&P wastes are exempt from RCRA requirements due to the low toxicity and high volume generated from processes unique to the oil and gas drilling and production industry.

The E&P waste exemption is for drilling fluids, produced water, and other wastes associated with oil and gas exploration, development, and production. Associated wastes include fluids that come in contact with the oil and gas production stream during the removal of produced water or other contaminants from the crude oil.

All fluids are contained and there shall be no discharge of fluids with the exception of unimpacted stormwater per the Federal SPCC regulations.

SPCC regulations are addressed by the use of a field wide plan, amended by each location as an appendix. These site specific appendices are created after construction and available per the SPCC Federal rule within 6 months of construction completion.

Use the specific Waste Guidelines (Appendix ii) at the end of this document to determine if a specific waste is exempt or contact the Environmental Coordinator.

RCRA E&P exempt wastes are not regulated as hazardous waste regardless of their composition or properties, but caution should be taken when those wastes exhibit hazardous characteristics such as reactivity or ignitability. These wastes must still be handled and disposed in compliance with waste regulations even though they are technically classified as being 'exempt' from regulation as hazardous waste.

1.4.2 Non-Exempt Wastes

Some wastes generated by operations are not exempt from federal hazardous waste regulations. For example, **new or unused leftover** products, such as acids, methanol, diesel, drilling mud, and cement, are not RCRA E&P exempt. Non-exempt waste must be evaluated to determine whether it is either hazardous or non-hazardous before transportation and disposal of the material takes place. To complete this determination, testing or process knowledge may be required.

Non-Exempt Non-Hazardous Waste: Wastes which are not specifically exempted but are not hazardous under the RCRA regulations. The generator is required to determine if a non-exempt waste is hazardous. Testing should be done if there is any question regarding whether a waste is hazardous. Disposal facilities may require testing to confirm the waste status.

Non-Exempt Hazardous Waste: Wastes which are not exempted and are hazardous by RCRA definition. These wastes must be handled and disposed as hazardous waste as specified under RCRA regulations.

Niobrara is classified as a Very Small Quantity generator. Very Small Quantity Generators (VSQG) are exempt from many of the requirements of RCRA which apply to small and large generators of hazardous waste. This is a huge benefit from a tracking and management standpoint however documentation must be maintained to verify that operations did not generate more than 220 pounds of hazardous waste in any single month. The Environmental Coordinator is responsible for tracking and documenting the amount of hazardous waste generated each month.

If generator status changes from VSQG to SQG or LQG, an EPA ID Number is required. The field must notify the Environmental Coordinator if they may exceed 220 pounds of hazardous waste generation in a month. In that situation, a site would be required to obtain an EPA Identification number and follow additional regulatory requirements.

2 Waste Handling and Storage

There are several important issues associated with the handling and storage of wastes, including proper containerization, container/waste labeling, waste segregation, and waste area management. Waste must be stored in tanks, transported by tanker trucks and/or pipelines, and disposed of at licensed disposal or recycling facilities.

3 Waste Disposal

Waste disposal is regulated by federal and/or state agencies. ConocoPhillips has developed guidance for proper disposal. No land treatment of oil-impacted or contaminated drill cuttings will be allowed. Disposal of oil-impacted or contaminated drill cuttings will be disposed of at licensed disposal or recycling facilities.

The process includes:

Inspection and approval of new disposal facilities by HSE.
Contract set up and approval by Supply Chain and the waste site vendor prior to shipping waste.
Waste profiling and testing.
Review and approval by the disposal facility to confirm that they can legally accept it.
Transportation by a DOT (Department of Transportation) shipper. Hazardous wastes shipments must adhere to DOT shipping requirements.
Any COP employee, contractor, or third party who would like to bring a new chemical onto COP operated facilities must first submit a Chemical Approval and Inventory Control form to COP Niobrara HSE.

4 Disposal Facility Selection

The waste disposal facility selection is based primarily on the type of waste or recyclable material that is being managed. The selection of an appropriate disposal or recycling facility is critical to ensure compliance and protection of the environment as well as prevention of safety incidents and violations.

The ConocoPhillips Waste Management Standard (Standard) establishes a requirement to evaluate the suitability of industrial waste disposal facilities utilized and to only use those that are company-approved. Consult Appendix i for a current list of approved third party waste sites used for waste disposal activities. Additionally, check with Supply Chain to ensure there is a current MSA in place with the facility prior to waste shipment.

Selection of a waste disposal facility depends on type of waste to be disposed (whether it is exempt, non-exempt or hazardous), the trucking distance to disposal facility and cost of disposal. Waste stream classification included in Appendix ii will help to determine which facility should be used. If the waste material is not listed in Appendix ii please consult the Environmental Coordinator for waste handling guidance.

5 Waste Transportation

Transportation of waste can occur once the waste is contained and identified; the appropriate disposal facility is contacted; the waste profile is approved; the proper paperwork, including manifests or bills of lading are completed; and the proper state notification and/or permit requirements are complete.

The transportation of hazardous materials is regulated by the Department of Transportation (DOT) (refer to 49 CFR Part 172). Hazardous waste manifests serve as DOT shipping papers. Hazardous waste manifest preparers and signers must properly classify, label and/or placard materials transported under the jurisdiction of the DOT.

Hazardous waste transporters must comply with all federal and state DOT Hazardous Material Rules and Regulations. Transporters must utilize proper waste manifesting and shipping paper records, obtain an EPA Transporters Identification Number from EPA (if required), and contain and clean-up any spills while hazardous waste is in their possession.

6 Waste Handling and Disposal Guides

Appendix ii lists many of the routine wastes generated by operations and provides handling and disposal information for each waste. If the waste is not included in this guide, please contact the Environmental Coordinator for handling and disposal instructions.

APPENDIX i – APPROVED FACILITIES

OFF -SITE FACILITIES:

Buffalo Ridge Landfill (WM)
Clean Harbors Environmental Services
Conservation Services, Inc (WM-CSI)
Expedition Water Solutions (EWS) #3 & #4
NGL Water Solutions C-2, C-5, C-6, C-8

BUFFALO RIDGE LANDFILL (WM)

	Non-Hazardous Solid Waste
Name	**Buffalo Ridge Landfill**
Location	11655 County Road 59 Keenesburg, CO 80643
Operator	Waste Management
Materials Accepted	• E&P Wastes, MSW, ACM, drill cuttings, soil, other profiled wastes
Restrictions	• Waste must be profiled & approved in advance • No liquid waste
Paperwork Required	• Non-Hazardous Waste Manifest

Facility Contact	Jack Epple, 303-944-7510 - cell
Compliance Contact	Doc Nyiro, 303-486-6034
Notes	• Return original copy of the Non-Hazardous Waste Manifest to COP HSE • Work with COP HSE to set up original profile if needed

CLEAN HARBORS ENVIRONMENTAL SERVICES

	Hazardous Solid & Liquid Waste	Non-Exempt Solids and Liquids
Name	**Clean Harbors Environmental Services**	**Clean Harbors Environmental Services**
Location	Clean Harbors Environmental Services Deer Trail Facilities 108555 E. Highway 36 Deer Trail, CO 80105	Clean Harbors Environmental Services Deer Trail Facilities 108555 E. Highway 36 Deer Trail, CO 80105
Operator	Clean Harbors Environmental Services 4721 Ironton Street, Denver, CO 80239	Clean Harbors Environmental Services 4721 Ironton Street, Denver, CO 80239
Materials Accepted	• RCRA Waste	• RCRA Non-Exempt Waste
Restrictions	• Waste must be profiled & approved in advance	• Waste must be profiled & approved in advance
Paperwork Required	• Hazardous Waste Manifest	• Hazardous Waste Manifest
Facility Contact	Jack Kehoe 970-386-2293	Jack Kehoe 970-386-2293
Compliance Contact	Jack Kehoe 970-386-2293	Jack Kehoe 970-386-2293
Notes	• Return original copy of the Hazardous Waste Manifest to COP HSE • Work with COP HSE to set up waste profile if needed	• Return original copy of the Hazardous Waste Manifest to COP HSE • Work with COP HSE to set up waste profile if needed

CONSERVATION SERVICES, INC. (CSI-WM)

	Non-Hazardous Solid & E&P Exempt Waste
Name	**Buffalo Ridge Landfill**
Location	11655 County Road 59 Keenesburg, CO 80643
Operator	Waste Management
Materials Accepted	• Industrial Non-Hazardous Waste Landfill: Asbestos-Friable, Asbestos-Non-Friable, Bioremediation, Drum Management-Liquids, Drum Management-Solids, E&P Wastes, Industrial & Special Waste, Liquifix (Solidification Services)
Restrictions	• Waste must be profiled & approved in advance
Paperwork Required	• Non-Hazardous Waste Manifest
Facility Contact	Dan Swaney, 281-850-7669 - cell
Compliance Contact	Ron Chacon, 303-886-9695
Notes	• Return original copy of the Non-Hazardous Waste Manifest to COP HSE • Work with COP HSE to set up original profile if needed

EXPEDITION WATER SOLUTIONS (EWS) #3 & #4 SWD

	Non-Hazardous E&P Exempt Liquid Waste	Non-Hazardous E&P Exempt Liquid Waste
Name	**EWS #3 SWD**	**EWS #4 SWD**
Location	20668 Niobrara Blvd. La Salle, CO 80645	31631 Co Rd 398, Keenesburg, CO 80643
Operator	Expedition Water Solutions	Expedition Water Solutions
Materials Accepted	Flowback and produced water	• Flowback and produced water
Restrictions	• Water waste must have no solids	• Water waste must have no solids
Paperwork Required	• Run ticket	• Run ticket
Facility Contact	Nick Goddard, 970-515-7722	Matt Gonzales 970-888-9888
Compliance Contact	Dave Gage 970-590-6463	Dave Gage 970-590-6463
Notes	• Work with COP HSE to set up original profile if needed	• Work with COP HSE to set up original profile if needed

NGL WATER SOLUTIONS C-2, C-5, C-6, C-8

	Non-Hazardous E&P Exempt Liquid Waste	Non-Hazardous E&P Exempt Liquid Waste	Non-Hazardous E&P Exempt Liquid Waste	Non-Hazardous E&P Exempt Liquid Waste
Name	**C-2 SWD**	**C-5 SWD**	**C-6 SWD**	**C-8 SWD**
Location	1635 CR 19 Brighton, CO 80603	CR16 Hudson, CO 80642	CR16 Hudson, CO 80642	61635 CR77 Grover, CO 80729
Operator	NGL Water Solutions	NGL Water Solutions	NGL Water Solutions	NGL Water Solutions
Materials Accepted	Flowback and produced water	Flowback and produced water	Flowback and produced water; liquids with solids	Flowback and produced water
Restrictions	• Water waste must have no solids	• Water waste must have no solids	• Water waste can have solids	• Water waste must have no solids
Paperwork Required	• Run ticket	• Run ticket	• Run ticket; non-hazardous manifest	• Run ticket
Facility Contact	Josh Patterson, 303-868-1286	Josh Patterson, 303-868-1286	Josh Patterson, 303-868-1286	Josh Patterson, 303-868-1286
Compliance Contact	Doug White, 303-809-3326 cell	Doug White, 303-809-3326 cell	Doug White, 303-809-3326 cell	Doug White, 303-809-3326 cell
Notes	• Work with COP HSE to set up original profile if needed	• Work with COP HSE to set up original profile if needed	• Work with COP HSE to set up original profile if needed	• Work with COP HSE to set up original profile if needed

APPENDIX ii – Waste Handling and Disposal Guides

Absorbent Materials – Crude Oil/Condensate

Description:	Absorbent material contaminated with crude oil, condensate, or other exempt waste. Includes oil rags, booms, pads, towels, paper products, and peat moss/vermiculite material.
Waste Category:	E&P Exempt; non-hazardous
Waste Characterization:	Sample and analyze for potential contaminants such as metals, benzene, etc. or use generator knowledge supported by past analytical data.
Waste Minimization:	Maintain equipment/facilities to prevent drips, leaks, spills, etc., which would require cleanup. Use drip pans or other containment to collect drips, leaks, etc. Reuse absorbent material if possible. Recycle absorbent pads and booms and other soaked material with an approved recycler.
Handling:	Handle in a manner that prevents spillage. Soaked material cannot be placed in the landfill. Soaked items must be stored in leak proof containers in the waste storage area.
Disposal:	• Remove free liquids with a wringer and allow the material (rags, booms, pads, towels) to dry. • Dispose at an industrial or municipal landfill authorized to accept this waste.
Transportation:	This type of material is not regulated under DOT. Containers should be marked: *COPC, OILY ABSORBENT MATERIAL ONLY.*
Records	Keep all manifests and shipping records and applicable documents.

Condensate

Description:	Condensed fluid refers both to condensed water and light condensed hydrocarbons. The principal sources are compressors, knockouts, coolers, treaters and dehydrators.
Category:	Exempt Waste
Waste Minimization:	Treat in production system Send to oil reclaimer
Handling:	Hydrocarbon condensate should be returned to the production stream. For safety reasons, hydrocarbon condensate should never be stored or handled except in gas plants or other facilities specifically equipped for its storage and handling.
Transportation:	Disposal facility manifest required; transporter must have appropriate Waste Hauler Permit. All shipments to an approved disposal facility must be accompanied by a state or the disposal facility manifest.
Disposal:	Condensate should be recycled back into the process flow whenever possible. If that is not possible, condensate/contaminated water should be taken to an approved SWD facility or other approved disposal facility.
Records:	Keep all manifest records and applicable documents.
Comments:	Waste contractors may not be used if they are not on the approved list.

Contaminated Soil (Contaminated with materials from down-hole)

Description:	Spills on soil of crude oil, condensate, produced water, and other materials from down-hole. This contaminated soil is considered a waste itself when disposed.
Waste Category:	E&P Exempt Waste
Waste Minimization	Every effort must be taken to avoid the spill from occurring so as to minimize waste volume. If a spill occurs, pick up the free liquid or solid spilled as soon as possible after the spill is contained.
Handling:	Recovered liquid may be recycled back into the production stream. If the state agency requires and/or allows, manage the contaminated soil in place. There are several remediation techniques available and effective for hydrocarbon spills. For non-hydrocarbon spills, typically a different approach to remediation would be used. State requirements must be implemented and guidance must be considered. For additional guidance on spill clean-up reference the *L48 Spill Clean-up Guidelines*. If the volume of impacted soil exceeds the soil's natural capacity for bioremediation, or if removal of contaminated soil is necessary, remove the impacted material and manage as waste material on-site.
Disposal:	If not left in place, dispose of contaminated soil at an approved waste disposal facility.
Records:	Document and describe the cleanup procedure and contamination levels after clean-up. This is usually sufficient recordkeeping for cleanup of most non-hazardous waste. For contaminated soil taken off location for disposal, keep the manifest and other records.
Comments:	For assistance, consult Environmental Coordinator.

Contaminated Soil (Other than down-hole materials)

Description:	Soil contaminated with spills of chemicals, solvents and other materials used on the lease that have not been used downhole. This contaminated soil is considered a regulated waste.
Waste Category:	E&P Non-Exempt Waste. The soil may be a **Hazardous Waste** if it contains a RCRA listed waste or if it exhibits one of the hazardous characteristics listed in the RCRA regulations (e.g., pH less than 2 or flammability). Contact Environmental Coordinator for waste characterization and classification assistance and preparation of waste profile.
Waste Minimization	Ensure containers are not leaking and have covers tightly fastened. Store containers in containment and where vehicles will not impact them.
Handling:	Recovered liquids and solids which are not exempt should be evaluated to determine if these materials are a hazardous waste. The material must be picked up and containerized, and properly managed on site prior to disposal. Typically, this includes labeling and inspecting the containers. Hazardous waste requires special handling, additional record keeping, inspections, and labeling. Additionally, if hazardous, the waste will count toward generator status volumes. Consult Asset HSE Group for guidance.
Disposal:	The contaminated soil, whether hazardous or non-hazardous, must be taken to an appropriate waste disposal facility. Contact Environmental Coordinator for cleanup and disposal assistance.
Records:	Document and describe the cleanup procedure and material removal activities performed after a spill. For contaminated soil taken off location for disposal, keep the manifest or records on the cleanup and removal work.
Comments:	For assistance, consult Environmental Coordinator.

Hydrocarbon Impacted Soil

Description:	Hydrocarbon impacted soil occurs when condensate, crude, or lube oil spills on the ground.
Waste Category:	E&P Exempt; - condensate, or crude oil Non-Exempt, non-hazardous or hazardous, – used or unused lube oil. Contact Environmental Coordinator for waste characterization and classification assistance and preparation of waste profile.
Waste Characterization:	E&P Exempt (Condensate, crude oil) – no testing required Non-Exempt – Unused lube oil impacted soil requires SDS for disposal- For used lube oil impacted soil requires TCLP, RCRA 8 Metals testing
Waste Minimization:	Conduct inspections and preventative maintenance on flow lines, storage tanks, and other E&P production equipment; use proper containers, keep lids on containers, and store containers properly to prevent overflow or spillage; maintain secondary containment for recovery of spills; and review SPCC Plans if applicable
Handling:	Workers must have appropriate safety and protective gear. If safe to do, immediately stop the spill and contain the flow; notify respective supervisor immediately; workers must have appropriate safety and protective gear; if possible, recycle free liquid back into the production stream; and contact the Environmental Coordinator for guidance.
Disposal Options:	COP facilities must ship waste only to audited and permitted disposal facilities. Only commercial disposal facilities which have been audited and approved for use and have appropriate permits can be used. Contact Environmental Coordinator to classify waste and select appropriate waste disposal facility.
Transportation:	Use a COP approved vendor with appropriate permits to transport the waste.
Records:	Keep all manifests and shipping records and applicable documents.

Soil, Contaminated (Chemicals, Crude Oil, Condensate, Produced Water, Petroleum Products, Glycol)

Description:	Spills of crude oil, condensate, produced water, glycol, chemicals or solvents used on the lease often contaminate soil around facilities. This contaminated soil is considered a waste itself. Every effort must be taken to avoid the spill from spreading.
Waste Category:	Exempt (condensate, crude oil, used glycol, produced water) Non-Exempt (Unused lube oil impacted soil requires SDS for disposal – for used lube oil in impacted soil TCLP, RCRA 8 Metals testing required) Contact your Environmental Coordinator for waste characterization assistance.
Waste Characterization:	Soil contaminated with exempt or non-exempt material
Waste Minimization:	Conduct inspections and preventative maintenance on flow lines, storage tanks, and other E&P production equipment. Use proper containers, keep lids on containers, and store containers properly to prevent overflow or spillage. Collect free liquid or solid spilled as soon as possible after the spill is contained. Recovered liquid, which is an exempt waste, may be recycled back into the production stream.
Handling:	Immediately stop the spill and contain the flow. Notify supervisor immediately. If possible, recycle free liquid back into the production stream. Recovered liquids and solids which are not exempt should be evaluated to determine if the waste is hazardous (contact Environmental Coordinator). Hazardous waste requires special handling, additional record keeping, inspections, and labeling.
Disposal Options:	Remove the soil contaminated by produced oil, water or used glycol and dispose at a COP approved disposal facility. Current waste profile must be in place prior to shipment. Manifest with profile number must accompany shipment to disposal site. If the soil is contaminated with a Non-Exempt Waste, notify your Environmental Coordinator for waste classification and disposal options.
Transportation:	Use a COP approved vendor with appropriate permits to transport the waste if applicable.
Records:	Document and describe the cleanup procedure performed to remove contaminated material. Collect photographs of site, before and after. For hazardous waste contact the Environmental Coordinator. For contaminated soil taken off location for disposal, retain the manifest or records on the removal job, including: a. Procedure and criteria required by agency for removal/disposal of soil b. Date of shipment c. Hauler's name and approval number d. Disposer's name and approval number e. Soil's source/location f. Waste profile number g. Volume of load h. Analysis of soil, if required

APPENDIX i

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN, 12/2018

Niobrara Area

(Facility Name)

Arapahoe County, Colorado

(Facility Location)

ConocoPhillips Company

(Operator)

34501 East Quincy Avenue

(Street Address)

Watkins, CO 80137

(City, State, Zip)

Table of Contents

List of Acronyms

ANSI	American National Standards Institute
API	American Petroleum Institute
ASTM	American Society of Testing & Materials
bbl	barrel
CAA	Clean Air Act
CDPHE	Colorado Department of Health and Environment
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CWA	Clean Water Act
COGCC	Colorado Oil and Gas Conservation Commission
DOT	Department of Transportation
E&P	exploration and production
EH&S	environmental health and safety
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
ERP	Emergency Response Plan
FRP	Facility Response Plan
gal	gallons
HSE	Health, Safety & Environment
mg/kg	milligrams per kilogram
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center
OPA	Oil Pollution Prevention
PE	Professional Engineer
SPCC	Spill Prevention, Control, and Countermeasure
TSCA	Toxic Substance Control Act
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey

SECTION ONE
General Information

1 General Information

This Spill Prevention Control and Countermeasure (SPCC) Plan for the ConocoPhillips Niobrara Area facilities has been prepared in accordance with Part 112 (Oil Pollution Prevention) of Title 40, Code of Federal Regulations (40 CFR), as amended. These regulations govern non-transportation-related facilities which exceed listed oil storage capacities and which, due to their location, could reasonably be expected to discharge oil into navigable waters of the U.S. or adjoining shorelines in quantities that may be harmful. The purpose of the SPCC Plan is to establish procedures, methods, equipment, and other measures to prevent the discharge of oil to navigable waters. A complete copy of this Plan is maintained at the Niobrara Area Field Office, and is available to the United States Environmental Protection Agency (USEPA) Regional Administrator for review during normal working hours.

1.1 Management Approval

ConocoPhillips is committed to the prevention of discharges of oil to the environment, including navigable waters and maintains the highest standards for spill prevention control through regular review, updating and implementation of this SPCC Plan. With my signature, I certify that this SPCC Plan has the full approval of company management at a level of authority to commit the necessary resources to fully implement the plan.

Dione Holt
Printed Name

Signature

4/13/18
Date

Operations Manager – Niobrara
Title
Area

Person and title accountable for oil spill prevention at the Facility:

Brian Aldrich
Printed Name

Signature

4/13/2018
Date

Operations Supervisor
Title

1 General Information

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Ken Powers
Printed Name

Signature

12.30.15
Date

Operations Manager – Niobrara
Title
Area

Person and title accountable for oil spill prevention at the Facility:

Brian Aldrich
Printed Name

Signature

12/30/2015
Date

Supervisor – Production
Title

1.2 Professional Engineer Certification

By means of this Professional Engineer Certification, I hereby attest, to the best of my knowledge and belief, to the following:

- I am familiar with the requirements of 40 CFR Part 112 and have verified that this Plan has been prepared in accordance with the requirements of this Part;
- I or my agent have visited and examined the facilities;
- I have verified that this Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards;
- I have verified through ConocoPhillips personnel that the required inspection and testing procedures have been established as described in Section 2; and
- I have verified that the Plan is adequate for the facilities.

Michael K. Lane
Printed name of registered Professional Engineer

Signature of Registered Professional Engineer

(Seal)

Date: April 13, 2018 Registration No: xxxxxx State: Colorado

1.2 Professional Engineer Certification

By means of this Professional Engineer Certification, I hereby attest, to the best of my knowledge and belief, to the following:

- I am familiar with the requirements of 40 CFR Part 112 and have verified that this Plan has been prepared in accordance with the requirements of this Part;
- I or my agent have visited and examined the facilities;
- I have verified that this Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards;
- I have verified through ConocoPhillips personnel that the required inspection and testing procedures have been established as described in Section 2; and
- I have verified that the Plan is adequate for the facilities.

Gregg Somermeyer

Printed name of registered Professional Engineer

Signature of registered Professional Engineer

(Seal)

Date: September 30, 2015 Registration No: 29224 State: Colorado

1.3 Facility Information

The locations of each ConocoPhillips production facility in the Niobrara Area are listed in the table in Appendix A and shown on the accompanying overall map of the area. Each production facility generally consists of a well head, treater, separator, vapor recovery unit, recycle pump, combustor, flare, storage tanks for crude oil and produced water, and interconnecting piping. Appendix B contains a location map, SPCC diagram, oil container and potential spills table, and calculations of secondary containment volumes for each production facility. The location maps include topographic, geomorphic, and hydrologic details from United States Geological Survey (USGS) maps. The SPCC diagrams illustrate the physical layout of each production facility, and include the following information, as applicable:

- Bulk oil storage containers (crude oil and produced water storage tanks);
- Oil containing process equipment
- Electrical equipment (e.g., transformers);
- Oil loading/unloading areas;
- Completely buried and bunkered oil storage tanks (including USTs covered under 40 CFR Part 280 or 281); and
- Mobile and portable oil container storage areas.

1.4 Substantial Harm Certification

ConocoPhillips' Niobrara Area facilities do not have the potential to cause substantial harm based on the criteria in 40 CFR Part 112, Appendix C, Attachment C-II. Therefore, ConocoPhillips is not required to prepare and submit a facility response plan (FRP) to the USEPA Regional Administrator. The Certifications of the Applicability of the Substantial Harm Criteria are provided in Appendix B for each facility in the Niobrara Area.

1.5 Contact List and Phone Numbers

A contact list and phone number reference for the facilities is provided is provided in Appendix C. An Emergency Notification Phone List is also provided in the Facility Emergency Response Plan (ERP)

1.6 Notification Data Sheet

A Notification Data Sheet and Sample Qualified Event Sheet are provided in Appendix C. A notification Data Sheet Form is also provided in the Facility ERP.

1.7 Training

ConocoPhillips provide the following minimum training to ConocoPhillips oil-handling personnel prior to assuming job responsibilities[1]:

- Operation and maintenance of equipment to prevent oil discharges;
- Oil discharge procedure protocols;
- Applicable pollution control laws, rules, and regulations;
- General facility operations; and
- The contents of the SPCC Plan.

[1] Contractors are expected to provide trained oil handling personnel to ConocoPhillips. ConocoPhillips provided training, including but not limited to field orientation, supplements contractor provided training and provides necessary Information to inform contractors of basic operational and reporting requirements.

ConocoPhillips oil handling personnel are instructed on job responsibilities and duties. They are under the direct supervision of the facility Maintenance and Operations Supervisor/Foreman, who is responsible for establishing performance and duty guidelines.

The training program is further described as follows:

- Operation and maintenance of equipment to prevent oil discharges
- Spill containment facilities and like appurtenances
- Mechanical devices related to:
    - Safety controls;
    - Relief valves and thief hatches; and
    - Flanges and fittings.
- Physical activities
    - Facility construction; and
    - Handling and transportation of petroleum products.
- Oil discharge procedure protocols
    - Response Management Structure;
    - Initial Response;
    - Internal Reporting; and
    - Oil Spill Emergency Reporting
        - United States Environmental Protection Agency (USEPA)
        - Colorado Oil and Gas Conservation Commission (COGCC)
        - Colorado Department of Health and Environment (CDPHE)
- Applicable oil spill prevention laws, rules and regulations
    - Federal Regulation 40 CFR Parts 110 and 112;
    - Clean Water Act (CWA) as amended in 1972, specifically §311;
    - Oil Pollution Act of 1990 (OPA 90); and
    - COGCC Rules 604, 906.
- General facility operations
    - Regional characteristics and considerations; and
    - Site specific details.
- The contents of the facility SPCC Plan
    - Review of the processes and procedures occurring at facilities and undertaken by onsite personnel;
    - Facility storage, drainage, and proximity to navigable waters;
    - Response, mitigation, and notification for the malfunction of equipment and possible failure or failure thereof, regardless of spill occurrence;
    - Review of reporting procedures;
    - General and preventative maintenance and care;
    - Facility security; and
    - Inspections and record keeping[2].

Discharge prevention briefings are scheduled and conducted for ConocoPhillips oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan. Such briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.

[2] SPCC regulations do not require documentation of discharge prevention training; however, ConocoPhillips maintains records of the discharge prevention training courses taken by each ConocoPhillips employee. Contractors are expected to maintain their own training records as deemed appropriate.

Briefings will also be conducted for oil handling and other appropriate personnel if modifications are made to process, personnel, equipment and/or other resources that could affect spill prevention, control, and/or countermeasures. Additional briefings will be held if any “near misses” or incidents are noted during the previous month.

Regular safety meetings are held to discuss a variety of safety procedures and other pertinent job responsibility criteria.

Contractors are expected to provide adequate training for their oil handling personnel. ConocoPhillips provides additional training, including but not limited to field orientation, and provides necessary information concerning basic operational and reporting requirements. Contractor briefings may also be conducted in the form of posted bulletins or notices. When notified by contract personnel, ConocoPhillips personnel address SPCC and other applicable regulatory requirements as necessary. Contractor briefings may also be conducted in the form of posted bulletins or notices.

1.8 Facility Security

Facility security is managed by operations personnel as a part of their regular duties. Some production facilities are fenced and locked. Other production facilities are not fenced because of their remote location. Fencing, if present, is shown on the SPCC Diagrams in Appendix B for each production site. The presence of perimeter fencing and locked gates at some facilities and the remote location of other facilities discourage vandalism. Security lighting is not necessary at these sites.

The Operations Superintendent or designee is designated to oversee safety and is ultimately responsible for spill prevention. A Safety Specialist is available at the facility to assist with spill prevention, although the field operator is the primary person accountable for spill prevention.

1.9 Documentation

Documentation of these Personnel, Training, and Discharge Prevention Briefing programs is maintained for a minimum period of three (3) years. Records of SPCC Training and Discharge Prevention Briefings are stored in SAP, Learning Express, or HSE files for SPCC records.

1.10 Prevention, Response and Cleanup

The facilities employ adequate discharge prevention measures, including procedures for routine handling of products (loading, unloading, facility transfers, etc.).

All bulk oil storage tanks are welded steel construction, and designed and constructed for hydrocarbon storage. Produced water storage tanks are either welded steel or fiberglass construction. The crude oil and produced water storage tanks are equipped with the following discharge prevention systems:

- Vent (tanks operate at or near atmospheric pressure);
- Overflow lines;
- Equalizing system; and
- High-high level switches that shut in the well and activate alarms in the control room.

Containment area material and construction, inspection, maintenance, and documentation are as follows:

- Steel secondary containment structures are used to prevent the discharge of oil from crude oil storage tanks, produced water storage tanks, vapor recovery towers, portable storage containers (e.g. 55 gallon drums) and separators/production skids;
- Secondary containment structures for crude oil and produced water storage tanks and separator/production skids are constructed with sufficient capacity to contain, at a minimum, the volume of the largest tank/vessel within the area plus sufficient freeboard for precipitation (see containment calculations for each facility in Appendix B);
- Earthen berms are provided for secondary containment of selected process equipment;

- Plastic load line containers are used to contain drips/releases resulting from hose disconnection following truck loading activities;
- Accumulated liquids within the containment areas are managed by:
  - Containment areas are regularly checked for the presence of oil and produced water (any oil or produced water will be returned to the system or managed in accordance with applicable regulations);
  - Snow and rainwater is removed by one of the following methods:
    - Pumping out by vacuum truck;
    - Evaporation (dependent upon quantity); or
    - Manual shovel (snow)
  - Each drainage event is documented on the Precipitation Drainage Log (Appendix E) and filed at the ConocoPhillips Niobrara Field Office.

Operators visually inspect the following during normal work activities:

- Ditches, traps sumps, swales, and other low lying areas that may trap oil or other petroleum products;
- Evidence of hole or penetrations to a containment system caused by burrowing animals;
- Aboveground tanks, valves, piping, flowlines, and equipment levels for:
  - Overflow protection;
  - Ruptures; and
  - Any form of leakage.

Any oil (as defined in 40 CFR 112.2) present resulting from a leak or release and any media affected thereby will be removed by one or combination of the following methods:

- Sorbent materials;
- Vacuum truck;
- Excavation;
- Natural attenuation; and/or
- Chemical or biological treatment in-situ.

1.11 Countermeasures

The facility discharge discovery, response and cleanup capabilities are described in the ConocoPhillips EP Lower 48 HSE Handbook. The capabilities and capacity for facility discharge discovery, response, and cleanup are described in the Oil Spill Contingency Plan (Appendix D). A written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged is also provided in Appendix D. The resources available to the facility for discharge cleanup are provided in the Contact List provided in Appendix D.

1.12 Disposal

The facility has established the following methods of disposal for recovered materials in accordance with applicable legal requirements. Waste management methods and procedures, including management of recovered materials, is described in the Waste Disposal and Reuse Guide located at the Niobrara Area Field Office.

1.13 Impracticability

Buried lines are used in the field for transport of produced fluids from the well head to the separator/ production skid (refer to Appendix B for site-specific details). Providing secondary containment around all

flowlines is impracticable. An oil spill contingency plan is available if needed (Appendix D). A written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged is also provided in Appendix D.

If containment and/or diversionary structures are impracticable for any new bulk storage containers, then periodic integrity testing of the container(s) and integrity and leak testing of the valves and piping will be performed.

1.14 Deviations to Rule

As stated above, some piping is located outside of secondary containment. Appropriate prevention and containment measures are provided for that piping. Maintenance, corrosion protection, testing, recordkeeping, and inspection procedures are employed to prevent and detect discharges from such lines in a timely manner to prevent a discharge. The integrity testing program for piping and valves has been developed in accordance with good engineering practice, and spill response equipment is readily available for deployment.

1.15 Conformance with other Requirements

ConocoPhillips' Niobrara Area facilities conform with applicable, more stringent Colorado state rules, regulations, and guidelines for spill prevention. All facilities are also constructed in accordance with applicable local fire codes.

All production facilities meet construction requirements of COGCC Rule 604:

- Atmospheric tanks used for crude oil storage are built in accordance with applicable standards published by Underwriters Laboratories, Inc. and the American Petroleum Institute;
- Secondary containment devices are constructed around crude oil and produced water tanks to provide secondary containment for the largest single tank and sufficient freeboard to contain precipitation;
- Secondary containment devices and all containment areas are sufficiently impervious to contain any spilled or released material; and
- Secondary containment devices are inspected at regular intervals and maintained in good condition.

All reportable spills will be reported to COGCC, the National Response Center (NRC), and the CDPHE, as detailed in the ERP. Spills greater than 1 barrels (bbl), including those contained within lined or unlined berms must be reported on COGCC Spill/Release Report, Form 19 (Appendix F). Spills of any size which impact or threaten to impact any waters of the state, residence or occupied structure, livestock, public byway, or surface water supply area require verbal reporting to COGCC as soon as practicable (303) 894-2100, but no later than 24 hours after discovery, and to the CDPHE's Environmental Release/Incident Report Hotline (877) 518-5608. A written report on COGCC Spill/Release Report, Form 19 must also be submitted. The details of all communications will be documented and recorded on the log in Appendix F.

Releases to surface or subsurface soils or groundwater will be remediated to meet the COGCC, Table 910-1 standards for soil and groundwater, as required.

The facilities also comply with applicable requirements of the following federal rules and regulations:

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA); 40 CFR part 305 and part 307;
- Clean Air Act (CAA); 40 CFR subchapter C parts 50-99;

- Resource Conservation and Recovery Act (RCRA); 40 CFR subchapter I parts 260-299;
- Toxic Substance Control Act (TSCA); 40 CFR subchapter R parts 700-799;
- Emergency Planning and Community Right-to-Know Act (EPCRA); 40 CFR part 355; and
- U.S. Environmental Protection Agency (USEPA) National Pollutant Discharge Elimination System (NPDES).

SECTION 2

Onshore Oil Production

2 Onshore Oil Production

2.1 Equipment Design and Containment

Tables for each facility in Appendix B contain an inventory of bulk oil and produced water storage containers, flow through process equipment/vessels, and loading areas. These tables also identify and characterize potential discharges of oil, and containment and/or diversionary measures to prevent a discharge.

The material and construction of bulk storage containers are compatible with the material stored and conditions of storage such as pressure and temperature. The crude oil and produced water storage tanks are constructed of ASTM A36 low carbon structural steel. No field-constructed aboveground oil storage containers are present at any of the facilities; therefore the SPCC Rule requirements for brittle fracture or other catastrophic failure evaluation are not applicable.

All bulk storage container and most separator/production skid installations are constructed so that a means of secondary containment is provided for the entire capacity of the largest single container or vessel plus sufficient freeboard to contain precipitation. A steel walled containment system is generally utilized for crude oil and produced water storage tanks. A similarly designed containment system is provided for most of the separator/production skids. Containment volume calculations for the crude oil storage tanks, produced water storage tank, and separators are presented in tables in Appendix B for each facility.

Containment areas are sufficiently impervious to contain discharged oil. Steel-walled containment structures are provided around the crude oil and produced water storage tanks, and most separator/production skids. They are constructed of heavy duty steel panels with sealed bolts and gaskets, and include brackets that allow for the panels and posts to move relative to one another as the ground heaves or settles. The steel panels are buried in the ground and the floors of the containment areas are sealed with bentonite to prevent any released fluids from escaping the containment area before it can be cleaned up.

Some flow-through process vessels, such as the vapor recovery unit (VRU), Combustor Knockout (KO), Flare KO, and/or separators at several well sites do not have sized secondary containment. These process vessels are periodically and regularly inspected for leaks, corrosion, and other conditions that could lead to a discharge. Corrective action and/or repairs are also made as necessary based on the inspections or upon evidence of an oil discharge, and any accumulation of oil discharge associated with flow-through process vessels is promptly removed, stabilized and/or remediated.

Crude oil and produced water storage tank installations are provided with:

- Adequate container capacity to assure that a container will not overfill if a pumper/gauger is delayed in making regularly scheduled rounds;
- Overflow equalizing lines between containers so that a full container can overflow to an adjacent container;
- Vacuum protection to prevent container collapse during a transfer of oil from the container; and
- High level sensors that alarm and shut in the well.

2.2 Facility Drainage

The steel wall secondary containment systems around the crude oil and produced water storage tanks and the separator/production skids are not equipped with drain valves. Therefore, the SPCC Rule requirement that drains in containment areas for oil and produced water bulk storage containers and oil production/process equipment are closed and sealed at all times, except when draining uncontaminated rainwater, does not apply.

The measures that are employed to ensure contaminated rainwater is not discharged from the containment areas for oil containing bulk storage containers and production/process equipment include:

- Liquid that accumulates inside the containment areas around oil and produced water bulk storage containers and separator/production skid is visually checked for oil and produced water (refer to Section 1.10 for additional detail). Routine inspections during normal work activities allow for the monitoring of accumulated rainwater levels within the containment area ensuring that overflow does not occur. Rainwater is removed via evaporation or pumping by a vacuum truck.
- Records of any precipitation discharges from containment areas are documented on the Precipitation Drainage Log (Appendix E) and kept at the Niobrara Field Office.

If oil is detected in containment areas or in field drainage systems, the oil will be removed and returned to the system or delivered to a recycling facility. The return to the system may be completed via vacuum truck.

2.3 Facility Transfer Operations

2.3.1 Loading/Unloading Racks

None of the facilities described in this Plan are equipped with a tank car or tank truck loading or unloading rack, therefore the related SPCC Rule requirement are not applicable.

2.3.2 Loading/Unloading Areas

Tank truck loading/unloading occurs at the Niobrara facilities. Tank car (rail) loading/unloading does not occur at these facilities. The containment and/or diversionary structure for the tank truck loading/unloading areas include:

- Earthen or natural structures that can contain discharges;
- Load line containers are provided in truck loading areas to contain drips/releases during loading; and
- Sorbent materials are readily available in the event of a leak or spill.

2.3.3 Tank Truck Loading

Proper procedures will be followed during tank truck loading to prevent overfilling. Drivers will not smoke or litter and shall keep the site clean. All loading activity will be performed with at least one person in the area at all times. Any spilled oil will be reported immediately.

The recommended procedure for produced water and condensate tank truck loading operations is as follows:

1. Prior to filling, determine the unfilled capacity of the receiving truck by a suitable gauging device. Do not load in excess of that amount.
2. Prior to filling and departure of any tank truck, cap and seal the lower most drain and all outlets of such vehicles. Then, closely examine for leakage, and if necessary, tighten, adjust, or replace to prevent liquid leakage while in transit.
3. Set brakes and shut off engine, unless necessary for loading and unloading.
4. Connect ground cable to tank truck and connect loading hose.
5. Place drip pan under connection (if one is not attached to piping).
6. Open tank truck inlet and loading line outlet valves.
7. Load truck to proper capacity.

8. Close valves opened in preceding steps.
9. Disconnect hose, drain in bucket.
10. Disconnect ground cable.

2.4 Flowline Maintenance Program

All flowlines and associated valves and equipment are compatible with the production fluids, their potential corrosivity, volume, and pressure, and other conditions expected in their operational environment.

The Niobrara Area flowline maintenance program involves inspections to identify the need for flowline maintenance. The operator visually inspects the above ground flowlines, valves and piping during normal work activities for corrosion, leaks, failures, and/or ruptures. Refer to the Piping Inspection, Testing, and Repair A&OI Procedures for additional details. A risk-based review of inspection findings for above ground flowlines, valves, and piping is conducted annually to ensure the completion of inspections and review accuracy and performance.

Corrective action and/or repairs are made to any flowlines lines and associated appurtenances as determined by visual inspections, tests, or evidence of a discharge. Any accumulations of oil discharges associated with flowlines and associated appurtenances are promptly removed, stabilized, and/or remediated.

2.5 Inspections, Tests and Records

Operators visit each production facility on an almost daily basis. SPCC inspections of visible aboveground equipment will be made quarterly utilizing the ConocoPhillips Company Exploration Production Lower 48 Health, Safety, and Environmental Checklist Gas Plant/Compressor Station/Lease Production Facility Checklist provided in Appendix E. Conditions at the time of the inspection will be recorded on the Checklist and kept at the Niobrara Field Office. The following checks will be performed during each SPCC inspection:

- Condition of all dikes, drip pans, and other spill containment facilities;
- Pump packings, valve packings, flanges, and other fittings for leakage; and
- Tanks (including supports and foundations), separators, and aboveground piping (including pipe supports) for visible deterioration or defects that may compromise integrity.

Visual inspections will be made of the interior and exterior of bulk storage tanks, separators, and piping based upon service history or whenever the equipment is opened. The condition of underground piping and/or pipe coatings will also be visually inspected whenever piping is uncovered.

The frequency of scheduled internal and/or external inspection of pressure vessels and external inspection of piping will be determined by company Inspection, Testing, and Repair A&OI Procedures. Qualified equipment inspectors will perform inspections. The date of inspection, name of inspector, equipment being inspected, and inspection results will be included in the inspection report.

Any recommendation(s) made during an inspection will be acted upon as soon as possible. Actions taken on recommendations are recorded and stored in the Niobrara Area Field Office. Records of the inspections and tests (including those maintained under usual and customary business practices), signed by the appropriate supervisor or inspector are retained on file for a minimum period of three (3) years. (Note: Existing inspections and tests kept under usual and customary business practices will suffice if approved by the certifying engineer).