

**HYDROGEN SULFIDE CONTINGENCY PLAN  
Drilling, Testing, & Completion**

**MRC ENERGY CO.**

---

**Reviewers**

- Operations Manager
- Operations Supt.
- Staff RES
- Field Supv.
- Engineering

**Latitude: N  
Longitude: W**

**(Surface Location)**

**H2S Contingency Plan # 0165      Revision# 0**

**This H2S Contingency Plan is subject to updating**

**Effective date: July 8, 2015**

**TABLE OF CONTENTS**

<b>I.</b>	<b>INTRODUCTION</b>	<b>3</b>
<b>II.</b>	<b>PURPOSE</b>	<b>4</b>
	<b>A. Operating Procedures</b>	<b>5</b>
	<b>B. Procedures to be Initiated Prior to reaching H2S Contingency Plan Compliance</b>	<b>6</b>
	<b>C. Drilling Below Contingency Plan Depth</b>	<b>7</b>
	<b>D. Procedures program</b>	<b>7</b>
<b>III.</b>	<b>CONDITIONS &amp; H<sub>2</sub>S EMERGENCY PROCEDURES</b>	<b>10</b>
	<b>A. Definition of Operational "Conditions"</b>	<b>10</b>
	<b>B. H2S Emergency Procedures; In Scope Personnel</b>	<b>12</b>
	<b>C. Instructions for Igniting the Well</b>	<b>16</b>
	<b>D. Coring</b>	<b>17</b>
	<b>E. Normal Operations</b>	<b>18</b>
<b>IV.</b>	<b>SAFETY EQUIPMENT</b>	<b>21</b>
<b>V.</b>	<b>TOXICITY OF VARIOUS GASES</b>	<b>23</b>
<b>VI.</b>	<b>PROPERTIES OF GASES</b>	<b>24</b>
<b>VII.</b>	<b>TREATMENT PROCEDURES FOR H2S POISONING</b>	<b>25</b>
<b>VIII.</b>	<b>BREATHING AIR EQUIPMENT DRILLS ON/OFF DUTY</b>	<b>26</b>
<b>IX.</b>	<b>HYDROGEN SULFIDE TRAINING CURRICULUM</b>	<b>27</b>
<b>X.</b>	<b>FIT TEST</b>	<b>29</b>
<b>XI.</b>	<b>H2S EQUIPMENT LIST</b>	<b>30</b>
<b>XII.</b>	<b>EMERGENCY PHONE NUMBERS</b>	<b>32</b>
<b>XIII.</b>	<b>EVACUATION OF GENERAL PUBLIC</b>	<b>37</b>
<b>XIV.</b>	<b>SEPCO EMERGENCY PHONE NUMBERS AND DIRECTIONS TO WELL SITE</b>	<b>38</b>
<b>XV.</b>	<b>ROE MAP (RADIUS OF EXPOSURE)</b>	<b>39</b>
<b>XVI.</b>	<b>RESIDENCE LIST WITHIN ROE</b>	<b>40</b>

## INTRODUCTION

**The H<sub>2</sub>S equipment will be rigged up 2 days prior to reaching a potential H<sub>2</sub>S containing zone. Drilling into any potential H<sub>2</sub>S zone shall not commence until the on-site MRC Drilling Supervisor has confirmed this plan in place.**

**The onsite Drilling Foreman will give Total Safety one week (7 days) notice to prepare for rig up of H<sub>2</sub>S equipment)**

To be effective, the plan requires the cooperation and effort of each person participating in the drilling of an H<sub>2</sub>S well. Each person must know his/her responsibilities and all emergency and safety procedures. He/she should thoroughly understand and be able to use with accuracy, all safety equipment while performing his/her normal duties, if the circumstance should arise. He/she should therefore familiarize himself/herself with the location of all safety equipment and check to see that it is properly stored, easily accessible at all times, and routinely maintained.

It is the intention of MRC ENERGY CO. and the Drilling Contractor to make every effort to provide adequate safeguards against harm to persons on the rig and in the immediate vicinity from the effects of hydrogen sulfide, which may be released into the atmosphere under emergency conditions. However, the initiative rests with the individual in utilizing the safeguards provided. The ideas and suggestions of the individuals involved in the drilling of this well are highly welcomed and act as a fundamental tool for providing the safest working conditions possible.

The drilling representative is required to enforce these procedures. They are set up for your safety and the safety of all others.

## II. PURPOSE

It is MRC Energy Co.'s intent to provide a safe working place, not only for its employees, but also for other contractors who are aiding in the drilling of this well. The safety of the general public is of utmost concern. All precautions will be taken to keep a safe working environment and protect the public.

There is a possibility of encountering toxic hydrogen sulfide gas. Safety procedures must be adhered to in order to protect all personnel connected with the operations as well as people living within the area.

MRC ENERGY CO.'S

The MRC Energy Co. representative will enforce all aspects of the H2S Contingency Plan. This job will become easier by a careful study of the following pages and training and informing all personnel that will be working on the well, their duties and responsibilities.

**A. OPERATING PROCEDURES**

**DEFINITIONS:**

**For purpose of this plan, on-site personnel shall be referred to as “In Scope Personnel” or “Out of Scope Personnel”, per the following definitions:**

**In Scope Personnel** – Personnel who will be working or otherwise present in potential H<sub>2</sub>S release areas, including the rig floor, cellar, pits, and shaker areas.

**Out of Scope Personnel** – Personnel who will not be working or Otherwise present in potential H<sub>2</sub>S areas. Such personnel include rig Site visitor, delivery and camp services personnel.

**GENERAL:**

Before this H<sub>2</sub>S contingency plan becomes operational, all regularly assigned In Scope Personnel (primarily the MRC, drilling contractor, and certain service personnel,) shall be thoroughly trained in the use of breathing equipment, emergency procedures, and responsibilities. Total Safety Technician or a designee assigned by the MRC Drilling Foreman shall keep a list of all personnel who have been through the on-site H<sub>2</sub>S training program at the drill site.

All In Scope Personnel shall be given H<sub>2</sub>S training and the steps to be taken during H<sub>2</sub>S conditions under which the well may be drilled. General information will be explained about toxic gases, as well as the physiological effects of H<sub>2</sub>S and the various classified operating conditions. In addition, the reader will be informed his/her general responsibility concerning safety equipment and emergency procedures.

The Total Safety H<sub>2</sub>S Safety Technician or MRC on-site RSE Technician shall make available the H<sub>2</sub>S Contingency Plan for all personnel to review.

Without exception, all personnel that arrive on location must proceed directly to and sign-in with the on-site MRC RSE Technician. In Scope Personnel will be required to complete an on-site H<sub>2</sub>S training and respirator fit testing before starting work, or produce evidence that they have received equivalent training. Out of Scope Personnel will be required to complete a site H<sub>2</sub>S awareness and general safety briefing. This briefing will consist of a H<sub>2</sub>S hazard overview, alarm review and required response to alarms.

**B. PROCEDURES TO BE INITIATED PRIOR TO H<sub>2</sub>S CONTINGENCY PLAN COMPLIANCE:**

A list of emergency phone numbers and contacts will be on location and posted at the following locations:

1. MRC ENERGY CO.'S Representative's Office
2. Drilling Contractor's, Toolpusher Office
3. Living Quarters Area

All safety equipment and H<sub>2</sub>S related hardware must be set up as required by MRC Energy Co. with regard to location of briefing areas, breathing equipment, etc. All safety equipment must be inspected periodically (at least weekly) with particular attention to resuscitators and breathing equipment.

In Scope Personnel working in the well site area will be assigned breathing apparatus. Operator and drilling contractor personnel required to work in the following areas will be provided with Self Contained Breathing Apparatus:

1. Rig Floor
2. Mud Pits
3. Derrick
4. Shale Shaker
5. Cellar

The Total Safety H<sub>2</sub>S Safety Technician will be responsible for rigging up all H<sub>2</sub>S continuous monitoring-type detectors. The Total Safety Technician will monitor and bump test the detector units periodically (at least at least once a week to test alarm function during drilling conditions. In the event H<sub>2</sub>S is detected, or when drilling in a zone confirmed to contain H<sub>2</sub>S, the units shall be bump tested at least once every 24 hours. A bump test/calibration log will be kept on location. All results will be reported to the MRC on-site Drilling Foreman.

All Total Safety H<sub>2</sub>S equipment will be maintained and inspected by a Total Safety Technician on at least a Weekly basis.

**C. DRILLING BELOW CONTINGENCY PLAN DEPTH**

H2S response drills will be held at least once per week if possible or as often as necessary to acquaint the crews and service company personnel of their responsibilities and the proper procedures to shut-in a well. Initial drills will be performed until crews demonstrate competency donning and working under mask. After the MRC Energy Co.'s representative is satisfied with initial blowout drill procedures, a drill will be conducted weekly with each crew, as necessary. The H2S Safety Technician or designee will conduct safety talks and maintain the safety equipment, consult and carry out the instructions of the drilling supervisor. All personnel allowed in the well work area during drilling or testing operations will be instructed in the use of breathing equipment until supervisory personnel are satisfied that they are capable of using it.

After familiarization, each person must perform a drill with breathing equipment. The drill should include getting the breathing equipment, donning the breathing apparatus, and performing expected duties for a short period. A record shall be kept of all personnel drilled and the date of the drill. H2S training records will be kept on location for all personnel.

Rig crews and service company personnel shall be made aware of the location of spare air bottles, resuscitation equipment, portable fire extinguishers, H<sub>2</sub>S monitors and detectors. Knowledge of the location of the H<sub>2</sub>S monitors and detectors are vital in determining as our gas location and the severity of the emergency conditions.

After any device has initially detected H<sub>2</sub>S, all areas of poor ventilation shall be inspected periodically by means of a portable H<sub>2</sub>S detector instrument. The buddy system will be utilized. (When an alarm sounds, personnel will don an SCBA, shut the well in, and proceed to SBA for roll call. The H<sub>2</sub>S Technician or designee will mask up, with a buddy and will verify source of H<sub>2</sub>S and report back to the on-site MRC Foreman.)

**D. PROCEDURES PROGRAM**

1. Drill Site
  - a. The drilling rig will be located to allow prevailing winds to blow across the reserve pit.
  - b. A Safe Briefing Area will be provided with a breathing air cascade trailer and or 30-minute SCBA's at the Primary Area. Personnel will assemble at the most up-wind station under alarm conditions, or when so ordered by the MRC Energy Co. representative, the Contractor representative, or

the Total Safety H<sub>2</sub>S Safety Technician. Windssocks or streamers will be anchored to various strategic places on a pole about 10 feet high, so it is in easy view from the rig floor at all times.

- c. Warning signs will be posted on the perimeters. "No Smoking" signs will be posted by MRC Energy Co.as well.
- d. One multi-channel automatic H<sub>2</sub>S monitor will be provided by Total Safety and the detector heads will be at the shale shaker, bell nipple, mud pits, rig floor, and quarter's area. The monitor will be located inside HSE or Company man trailer. Should the alarm be shut off to silence the sirens, the blinker light must continue to warn of H<sub>2</sub>S presence. The Total Safety H<sub>2</sub>S Safety Technician or designee will continuously monitor the detectors and will reactivate the alarm if H<sub>2</sub>S concentrations increase to a dangerous level.
- e. A method of escape will be open at all times.
- f. If available, land line telephone service will be provided or cell phones provided. (Primary communications provided)
- g. A rig communication system will be provided, as needed.
- h. A gas trap, choke manifold, and degasser will be installed.
- i. A kill line, securely anchored and of ample strength, will be laid to the well-head from a safe location. This line is to be used only in an emergency.

#### General

- a. The MRC Energy Co. representative and/or the Contractor's Toolpusher will be available at all times. The drilling supervisor, while on duty, will have complete charge of the rig and location operations and will take whatever action is deemed necessary to insure personnel safety, to protect the well, and to prevent damage.
- b. A Mud Engineer will be on location at all times when drilling takes place at the depth H<sub>2</sub>S may be expected. The mud engineer will be able to verify the presence or absence of H<sub>2</sub>S.

**III. CONDITIONS AND EMERGENCY PROCEDURES**

**A. DEFINITION OF OPERATIONAL "CONDITIONS"**

<b>CONDITION I</b>	<b>"POSSIBLE DANGER"</b>
Warning Flags	Green
Alarms	No Alarm. Less than 10 ppm
Characterized By:	Drilling operations in zones that may contain hydrogen sulfide. This condition remains in effect unless H <sub>2</sub> S is detected and it becomes necessary to go to Condition II.
General Action:	<ul style="list-style-type: none"><li>a. Be alert for a condition change</li><li>b. Check all safety equipment for availability and proper functioning.</li><li>c. Perform all drills for familiarization and proficiency.</li></ul>
<b>CONDITION II</b>	<b>"MODERATE DANGER"</b>
Warning Flags	Yellow
Alarms:	Actuates at 10 ppm. Continuous flashing light.
Characterized By:	Drilling operations in zones containing hydrogen sulfide. This condition will remain in effect until adding chemicals to the mud system neutralizes the hydrogen sulfide or it becomes necessary to go to Condition III.
General Action:	<ul style="list-style-type: none"><li>a. Be alert for a condition change</li><li>b. WHEN DRILLING AHEAD - Driller and designated crewmember will don 30 min SCBA, shut-in the well and immediately proceed to the Safe Briefing Area.  WHEN TRIPPING – Driller and two designated crewmembers will don 30 min SCBA, shut in the well and immediately proceed to the Safe Briefing Area. The Derrickman will</li></ul>

don a 5-minute escape pack, descend to the rig floor, don a 30-min SCBA (if necessary) and immediately proceed to the Safe Briefing Area.

- c. All In Scope Personnel will proceed directly to the appropriate Safe Briefing Area.
- d. Remain in safe briefing area, take roll call and wait for instructions
- e. Contact the Total H2S Technician if not on location.
- f. Personnel shall ensure that their breathing apparatus is properly fitted and operational before entering an H<sub>2</sub>S contaminated area to provide assistance to anyone who may be injured or overcome by toxic gases.
- g. All Out of Scope Personnel will report to the appropriate Safe Briefing Area.

**CONDITION III      “EXTREME DANGER”**  
Warning Flags                      Red

Alarms                                      Actuate at 15 ppm. Continuous Sirens and Flashing Lights

Characterized by:                      Critical well operations which pose an immediate threat of H<sub>2</sub>S exposure to on-site personnel and a potential threat to the public.

General Action:                      a.      WHEN DRILLING AHEAD - Driller and designated crewmember will don 30 min SCBA, shut-in the well and immediately proceed to the Safe Briefing Area.

WHEN TRIPPING – Driller and two designated crewmembers will don 30

min SCBA, shut in the well and immediately proceed to the Safe Briefing Area. The Derrickman will don a 5-minute escape pack, descend to the rig floor, don a 30-min SCBA (if necessary) and immediately proceed to the Safe Briefing Area.

- b. All In Scope Personnel should don SCBA if nearby and immediately proceed to Safe Briefing Area. If SCBA is not nearby at time of alarm, DO NOT GO TOWARDS RIG AREA, but proceed directly to the Safe Briefing Area
- c. All out of Scope Personnel shall evacuate the location.
- d. Remain in the Safe Briefing Area, take roll call and wait for instructions.
- e. Contact the Total H2S Technician if not on location.
- f. Personnel shall ensure that their breathing apparatus is properly fitted and operational before entering an H<sub>2</sub>S contaminated area to provide assistance to anyone who may be injured or overcome by toxic gases. Use the buddy system.
- g. Remain in safe briefing area, take roll call and wait for instructions.
- h. A cascade breathing air systems shall be mobilized and utilized to conduct any additional on rig work required to correct the H2S release condition.
- i. If well is ignited do not assume area is safe. SO<sub>2</sub> is hazardous and not all H2S will burn.

## H<sub>2</sub>S EMERGENCY PROCEDURES; IN SCOPE PERSONNEL

### A. Day To Day Drilling Operations

1. Upon discovering a release of H<sub>2</sub>S gas in the ambient air by warning alarms or in any other way **Do Not Panic**.
2. Hold your breath donning the nearest Self Contained Breathing Apparatus and rapidly move up or across-wind away from the areas where H<sub>2</sub>S sensing devices are in place, to the closest available safe briefing area. Continue to use breathing apparatus until it has been determined that the exposure of H<sub>2</sub>S gas in the ambient air no longer exists. **Do Not Panic!**
3. Utilize the "Buddy System", i.e.; select and pair up each person participating in the drilling of an H<sub>2</sub>S well prior to an emergency situation.
4. Help anyone who is overcome or affected by the H<sub>2</sub>S gas by taking him/her up-wind out of the contaminated area. (This should be done utilizing an SCBA and with a buddy.)
5. Take necessary steps to confirm the release of the H<sub>2</sub>S gas into the ambient air.
  - When an H<sub>2</sub>S alarm activates, two designated personnel using the buddy system, while wearing their self contained breathing apparatus, will determine by the read-out on the fixed monitor which sensing device has detected the release of the H<sub>2</sub>S gas.
  - They will utilize the hand-held sniffer type device at the particular sensing point disclosed on the fixed monitor to corroborate the fact that H<sub>2</sub>S gas has actually been released. This will rule out the possibility of a false alarm. This will be done with a buddy and under mask after reporting to the Safe Briefing Area for roll call and instructions by on-site MRC Foreman.
6. Refer to the Emergency Phone Numbers and call emergency personnel.
7. Take the necessary steps to suppress the release of H<sub>2</sub>S gas into the ambient air. Comply with the MRC Energy Co. Representative to physically suppress the release of H<sub>2</sub>S gas at the actual release point.

8. Check all of MRC Energy Co.'s monitoring devices and increase gas-monitoring activities with the portable hand-operated H<sub>2</sub>S and gas detector units.

**Do Not Panic!**

The MRC Energy Co. representative will assess the situation and with assistance of the Contractor's Representative and Total Safety's H<sub>2</sub>S Safety Technician or on site designee, will assign duties to each person to bring the situation under control.

**B. RESPONSIBILITIES OF WELL-SITE PERSONNEL**

In the event of a release of potentially hazardous amounts of H<sub>2</sub>S, all personnel will immediately don their protective breathing apparatus, the well will be shut in and personnel will proceed upwind to the nearest designated safe briefing area for roll call and instructions by MRC Foreman. Consideration will be given to evacuating Out of Scope Personnel, as situation warrants.

**1. MRC ENERGY CO.'S Well-site Representatives**

- a. If MRC Energy Co.'s well-site representative is incapacitated or not on location, this responsibility will fall to the Toolpusher/Driller.
- b. Immediately upon assessing the situation, set this plan into Action by initiating the proper procedures to contain the gas and notify the appropriate people and agencies.
- c. Ensure that the alarm area indicated by the fixed H<sub>2</sub>S Monitor is checked and verified with a portable H<sub>2</sub>S detector. (Safety Technician if on location or MRC assigned designee with a buddy utilizing SCBA's)
- d. Consult Pusher/driller of remedial actions as needed.
- e. Ensure that non-essential personnel proceed to the safe briefing area.
- f. Ensure location entrance barricades are positioned. Keep the number of persons on location to a minimum during hazardous operations.

- g. Consult each contractor, Service Company and all others allowed to enter the site, that H<sub>2</sub>S gas may be encountered and the potential hazards that may exist.
- h. Authorize the evacuation of local residents if H<sub>2</sub>S threatens Their safety.
- i. Non essential personnel should be evacuated from location if Situation warrants.

**2. Toolpusher**

- a. Toolpusher/Driller will assume responsibilities of MRC Energy Co.'s well-site representative if that person is incapacitated or not on location.
- b. Ensure that the alarm area indicated by the fixed H<sub>2</sub>S monitor is checked and verified with a portable H<sub>2</sub>S gas detector. (Alarm area indicated by the monitor will be Checked by the H<sub>2</sub>S Technician and a buddy, under mask.) This will be done after checking in and roll call at the Upwind Safe Briefing Area.
- c. Confer with MRC Energy Co.'s well-site representative or superintendent and direct remedial action to suppress the H<sub>2</sub>S and control the well.
- d. Ensure that personnel at the safe briefing area are instructed on emergency actions required.
- e. Ensure that personnel at the drill floor area are instructed on emergency actions required.
- f. Ensure that all personnel observe the appropriate safety and emergency procedures.
- g. Ensure that all persons are accounted for and provided emergency assistance as necessary.

**3. Mud Engineer**

- a. Run a sulfide check on the flowline mud.
- b. Take steps to determine the source of the H<sub>2</sub>S and suppress it. Lime and H<sub>2</sub>S scavenger shall be added to the mud as necessary.

**4. Total H<sub>2</sub>S Safety Technician, if on location, or MRC Designee**

- a. H<sub>2</sub>S Safety Technician or designee don nearest SCBA and report to Safe Briefing Area for roll call, take a buddy masked up and check monitor and verify with a portable H<sub>2</sub>S detector the alarm area indicated by the fixed H<sub>2</sub>S monitor. Advise the Toolpusher/Driller and MRC Energy Co.'s well-site representative of findings. Record all findings.
- b. If H<sub>2</sub>S is flared, check for sulfur dioxide (SO<sub>2</sub>) near the flare as necessary. Take hourly readings at different perimeters, log readings and record on location.
- c. Ensure that personnel at the safe briefing area are instructed on emergency actions required.
- d. Ensure that the appropriate warning flags are displayed.
- e. Ensure that all personnel are in S.C.B.A. as necessary.
- f. Ensure that all persons are accounted for and provide emergency assistance as necessary.
- g. Be prepared to evacuate rig if order is issued.

**5. General Personnel & Visitors**

- a. All In Scope Personnel, if not specifically designated to shut the well in or control the well, shall proceed to the (upwind) safe briefing area. All Out of Scope Personnel shall immediately proceed to the appropriate (upwind) safe briefing area or evacuate the site as conditions warrant.

- b. During any emergency, use the “buddy” system to prevent anyone from entering or being left in a gas area alone, even wearing breathing apparatus.
- c. Provide assistance to anyone who may be injured or overcome by toxic gases. Personnel shall ensure that their breathing apparatus is properly fitted and operational before entering a potentially H<sub>2</sub>S contaminated area.
- d. Remain in safe briefing area and wait for instructions.

**C. INSTRUCTIONS FOR IGNITING THE WELL**

- 1. The Toolpusher/Driller will confer with MRC Energy Co.’s well-site representative who will secure the approval of the “Texas Wells Delivery Manager, prior to igniting the well, if at all possible.

The Toolpusher/Driller will be responsible for igniting the well in the event of severe well control problems. This decision should be made only as a last resort in situations where it is clear that:

- a. Human life and property are endangered, or
  - b. There is no hope of controlling the well under current conditions.
- 2. Once the decision has been made, the following procedures should be followed:
    - a. Two people wearing self-contained breathing apparatus will be needed for the actual lighting of the well. They must first establish the flammable perimeter by using an explosimeter. This should be established at 30% to 40% of the lower flammable limits.
    - b. After the flammable perimeter has been established and everyone removed from the area, the ignition team should select a site upwind of the well from which to ignite the well. This site should offer the maximum protection and have a clear path for retreat from the area.

- c. The ignition team should have safety belts and lifeline attached and manned before attempting ignition. If the leak is not ignited on the first attempt, move in 20 to 30 feet and fire again. Continue to monitor with the explosimeter and NEVER fire from an area with over 75% of the Lower Explosive Limit (LEL). If having trouble igniting the well, try firing 40 degrees to 90 degrees on either side of the well.
- d. If ignition is not possible due to the makeup of the gas, the toxic perimeter must be established and evacuation continued until the well is contained.
- e. All personnel must act only as directed by the person in charge of the operations.

NOTE: After the well is ignited, burning hydrogen sulfide (H<sub>2</sub>S) will convert to sulfur dioxide (SO<sub>2</sub>), which is also a highly toxic gas.

**DO NOT ASSUME THE AREA IS SAFE AFTER THE WELL IS IGNITED**

**D. CORING PROCEDURES**

Only essential personnel shall be on the rig floor. Ten (10) stands prior to retrieving core barrel; all personnel on drill floor and in derrick shall confirm self-Contained breathing apparatus available and ready for use.

A Total H<sub>2</sub>S Technician will don a SCBA with a buddy assigned from the rig crew, and continuously monitor for H<sub>2</sub>S at each connection. Any levels detected will require operations to be shut down and all involved personnel to don SCBAs. Precautions will remain in place until barrel is laid down.

All involved personnel will don SCBAs when removing the inner barrel from the outer barrel. SCBAs can be removed once the absence of H<sub>2</sub>S is confirmed by the Total H<sub>2</sub>S Technician.

Cores will be appropriately marked and sealed for transportation.

## Normal Operations

### 1. Responsibilities of well-site personnel

#### a. Well-site Representative

1. Notify H<sub>2</sub>S Technician of expected date to reach Contingency Plan implementation depth (Two (2) days prior to reaching suspected H<sub>2</sub>S bearing zone) or prior to starting well work.
2. Ensure H<sub>2</sub>S Safety Technician completes rig-up procedures prior to reaching Contingency Plan effective depth.
3. Restrict the number of personnel at the drilling rig or well site to a minimum while drilling, starting well work, testing or coring.
4. Ensure weekly H<sub>2</sub>S drills/training are performed, if possible.

#### B. Toolpusher

1. Ensure that necessary H<sub>2</sub>S safety equipment is provided on the rig, and that it is properly inspected and maintained.
2. Ensure that all personnel that work in the well area, are thoroughly trained in the use of H<sub>2</sub>S safety equipment and periodic drills are held to maintain an adequate level of proficiency.

#### C. In Scope Personnel

1. Remain clean-shaven. Beards and long sideburns do not allow a proper facepiece seal.
2. Receive H<sub>2</sub>S safety training on location, or confirm prior training by certification that is one year within date.
3. Familiarize yourself with the rig's Contingency Plan.
4. Inspect and practice putting on your breathing apparatus.

5. Know the location of the “safe briefing areas”.
6. Keep yourself “wind conscious”. Be prepared to quickly move upwind and away in the event of any emergency involving release of H<sub>2</sub>S.

**D. Total Safety H<sub>2</sub>S Safety Technician or MRC Designee**

1. Conduct training as necessary to ensure all personnel working in well area are familiar with the contingency procedures and the operation of emergency equipment.
2. Check all H<sub>2</sub>S safety equipment to ensure that it is ready for emergency use:
  - Check pressure weekly for each shift on breathing apparatus (both 30-minute and hip-packs) to make sure they are charged to full volume.
  - Check pressure on cascade air bottles, if on location, to see that they are capable of recharging breathing apparatus.
  - Check oxygen resuscitator, if on location, to ensure that it is charged to full volume.
  - Check H<sub>2</sub>S detectors weekly for each shift (fixed and portable), and explosimeter, to ensure they are working properly.
3. Provide a weekly report to MRC Energy Co.’s well-site representative documenting:
  - Calibrations performed on H<sub>2</sub>S detectors.
  - Proper location and working order of H<sub>2</sub>S safety equipment.
  - Attendance of all personnel, trained or retrained, and their company.
  - Weekly drills, if held and a list of personnel participating and summary of actions.

**OUT OF SCOPE PERSONNEL**

MRC Energy Co. policy will not require Out of Scope Personnel to be clean shaven, have processed medical questionnaires, fit testing, or have certified H2S Training.

## SAFETY EQUIPMENT

**All respirators will be designed, selected, used and maintained in conformance with ANSI Z88.2, American National Standard for respiratory protection.**

Personal protective equipment must be provided and used. Those who are expected to use respiratory equipment in case of an emergency will be carefully instructed in the proper use and told why the equipment is being used. Careful attention will be given to the minute details in order to avoid possible misuse of the equipment during periods of extreme stress.

Self-contained breathing apparatus provides complete respiratory and eye protection in any concentration of toxic gases and under any condition of oxygen deficiency. The wearer is independent of the surrounding atmosphere because he/she is breathing with a system admitting no outside air. It consists of a full face mask, breathing tube, pressure demand regulator, air supply cylinder, and harness. Pure breathing air from the supply cylinder flows to the mask automatically through the pressure demand regulator which reduces the pressure to a breathing level. Upon inhalation, air flows into the mask at a rate precisely regulated to the user's demand. Upon exhalation, the flow to the mask stops and the exhaled breath passes through a valve in the face piece to the surrounding atmosphere. The apparatus includes an alarm & gauge which warns the wearer to leave the contaminated area for a new cylinder of air or cylinder refill.

The derrickman is provided with a full face piece unit attached to a 5- minute escape cylinder. He will also have his own self-contained 30-minute unit breathing apparatus located on the drilling floor. He will use the 5-minute unit to exit the derrick to the floor, donning the 30-minute unit located on the floor, if needed.

All respiratory protective equipment, when not in use, should be stored in a clean, cool, dry place, and out of direct sunlight to retard the deterioration of rubber parts. After each use, the mask assembly will be scrubbed with soap and water, rinsed thoroughly, and dried. Air cylinders can be recharged to a full condition from a cascade system.

Personnel in each crew will be trained in the proper techniques of bottle filling.

The primary piece of equipment to be utilized, should anyone be overcome by hydrogen sulfide, is the oxygen resuscitator, if on location.

When asphyxiation occurs, the victim must be moved to fresh air and immediately given artificial respiration. In order to assure readiness, the bottles of oxygen will be checked at regular intervals and an extra tank kept on hand.

Hand-operated pump-type detectors incorporating detector tubes will give more accurate readings of hydrogen sulfide. The pump-type draws air to be tested through the detector tube containing lead acetate-silica gel granules. Presence of hydrogen sulfide in the air sample is shown by the development of a dark brown stain on the granules, which is the

scale reading of the concentration of hydrogen sulfide. By changing the type of detector tube used, this detector may also be used for sulfur dioxide (SO<sub>2</sub>) detection when hydrogen sulfide (H<sub>2</sub>S) is being burned in the flare area.

Provisions must be made for the storage of all safety equipment as is evident from the foregoing discussion. All equipment must be stored in an available location so that anyone engaged in normal work situations is no more than "one breath away" from a mask.

## V – TOXICITY OF VARIOUS GASES

Lethal Common Name ppm <sup>4</sup>	Chemical Formula	Specific Gravity <sup>1</sup>	PEL (OSHA) <sup>2</sup>	STEL <sup>3</sup>
Hydrogen Cyanide 300	HCN	0.94	10	150
Hydrogen Sulfide 600	H <sub>2</sub> S	1.18	20	Peak- 50ppm
Note: The ACGIH(7) recommends a TWA(6) value of 10ppm as the TLV(5) for H <sub>2</sub> S and an STEL of 15ppm.				
Sulfur Dioxide 1000	SO <sub>2</sub>	2.21	2	5 ppm
Chlorine	CL <sub>2</sub>	2.45	1	
Carbon Monoxide 1000	CO	0.97	35	200/1 Hour
Carbon Dioxide 10%	CO <sub>2</sub>	1.52	5000	5%
Methane	CH <sub>4</sub>	0.55	90000	

<sup>1</sup> Air = 1.0

<sup>2</sup> **Permissible** - Concentration at which is believed that all workers may repeatedly be exposed, day after day, without adverse effect.

<sup>3</sup> **STEL** - Short Term Exposure Limit. A 15-minute time weighted average.

<sup>4</sup> **Lethal** - Concentration that will cause death with short-term exposure.

**TLV** – Threshold Limit Value; a concentration recommended by the American Conference of Governmental Industrial Hygienists (ACGIH)

**TWA** – Time Weighted Average; the average concentration of contaminant one can be exposed to over a given eight-hour period.

**ACGIH** – (American Conference of Governmental Industrial Hygienists) is an organization comprised of Occupational Health Professionals believed by many to be the top experts in the field of Industrial Hygiene. They are recognized as an expert resource by OSHA. The ACGIH releases a bi-annual publication "Threshold Limit Values and Biological Indices" that many safety professionals consider to be the authoritative document on airborne contaminants.

Reference: API RP-49, September 1974 - Reissued August 1978

## VI. PROPERTIES OF GASES

### A. CARBON DIOXIDE

1. Carbon Dioxide (CO<sub>2</sub>) is usually considered inert and is commonly used to extinguish fires. It is 1.52 times heavier than air and will concentrate in low areas of still air. Humans cannot breathe air containing more than 10% CO<sub>2</sub> without losing conscience or becoming disorientation in a few minutes. Continued exposure to CO<sub>2</sub> after being affected will cause convulsions, coma, and respiratory failure.
2. The threshold limit of CO<sub>2</sub> is 5000 ppm. Short-term exposure to 50,000 ppm (5%) is reasonable. This gas is colorless, odorless, and can be tolerated in relatively high concentrations.

### B. HYDROGEN SULFIDE

1. Hydrogen Sulfide (H<sub>2</sub>S) is a colorless, transparent, flammable gas. It is heavier than air and, hence, may accumulate in low places.
2. Although the slightest presence of H<sub>2</sub>S in the air is normally detectable by its characteristic "rotten egg" odor, it is dangerous to rely on the odor as a means of detecting excessive concentrations because the sense of smell is rapidly lost, allowing lethal concentrations to be accumulated without warning. The following table indicates the poisonous nature of H<sub>2</sub>S.

CONCENTRATION			EFFECTS
% H <sub>2</sub> S	PPM	GR/100 SCF <sup>1</sup>	
0.001	10	.65	Safe for 8 hours without respirator. Obvious and unpleasant odor.
0.0015	15	0.975	Safe for 15 minutes of exposure without respirator.
0.01	100	6.48	Kills smell in 3-15 minutes; may sting eyes and throat.
0.02	200	12.96	Kills smell quickly; stings eyes and throat.
0.05	500	32.96	Dizziness; breathing ceases in a few minutes; need prompt artificial respiration.
0.07	700	45.92	Rapid Unconsciousness; death will result if not rescued promptly.
0.1	1000	64.80	Instant unconsciousness, followed by death within minutes.

<sup>1</sup> Grains per 100 Cubic Feet

## VII. Treatment Procedures for Hydrogen Sulfide Poisoning

- A. Remove the victim to fresh air.
- B. If breathing has ceased or is labored, begin resuscitation immediately.  
Note: This is the quickest and preferred method of clearing victim's lungs of contaminated air; however, under disaster conditions, it may not be practical to move the victim to fresh air. In such instances, where those rendering first aid must continue to wear masks, a resuscitator should be used.
- C. Apply resuscitator to help purge H<sub>2</sub>S from the blood stream.
- D. Keep the victim at rest and prevent chilling.
- E. Get victim under physician's care as soon as possible.

### C. SULPHUR DIOXIDE

1. Sulfur Dioxide (SO<sub>2</sub>) is a colorless, non-flammable, transparent gas.
2. SO<sub>2</sub> is produced during the burning of H<sub>2</sub>S. Although SO<sub>2</sub> is heavier than air, it can be picked up by a breeze and carried downwind at elevated temperatures. Since SO<sub>2</sub> is extremely irritating to the eyes and mucous membranes of the upper respiratory tract, it has exceptionally good warning powers in this respect. The following table indicates the toxic nature of SO<sub>2</sub>:

CONCENTRATION		EFFECTS
% SO <sub>2</sub>	PPM	
0.0005	3 to 5	Pungent odor, normally a person can detect SO <sub>2</sub> in this range.
0.0012	12	Throat irritation, coughing, constriction of the chest, tearing and smarting of eyes.
0.015	150	So irritating that it can only be endured for a few minutes.
.05	500	Causes a sense of suffocation, event with the first breath.

## VIII. BREATHING AIR EQUIPMENT DRILLS FOR ON & OFF DUTY PERSONNEL

**An H<sub>2</sub>S Drill and Training Session must be given once a week to ALL on-duty personnel with off duty personnel. On-duty and Off-duty personnel will reverse roles on alternate drills.**

**An H<sub>2</sub>S drill and training session must be given once a week to all off-duty personnel in coincidence with on-duty personnel reversing roles on alternate drills.**

The purpose of this drill is to instruct the crews in the operation and use of breathing air and H<sub>2</sub>S related emergency equipment and to allow the personnel to become acquainted with using the equipment under working conditions. The crews should be trained to put on the breathing air equipment within one minute when required or requested to do so.

The following procedure should be used for weekly drills. The MRC supervisor must be satisfied that the crews are proficient with the equipment.

1. All personnel should be informed that a drill will be held.
2. The Total H<sub>2</sub>S Safety Technician or a designee assigned by the MRC Drilling Foreman should initiate the drill by signaling as he/she would if H<sub>2</sub>S was detected.
3. Personnel should don their breathing apparatus.
4. Once the breathing air equipment is on, the H<sub>2</sub>S Technician should check all personnel to insure proper operation.

A training and information session will be conducted after each drill to answer any H<sub>2</sub>S related questions and to cover any gaps identified from one of the following topics:

- Condition II, and III alerts and steps to be taken by all personnel.
- The importance of wind direction when dealing with H<sub>2</sub>S.
- Proper use and storage of all types of breathing equipment.
- Proper use and storage of oxygen resuscitators.
- Proper use and storage of H<sub>2</sub>S detectors (Mini Checks or equivalent).
- The "buddy system" and the procedure for rescuing a person overcome by H<sub>2</sub>S.
- Responsibilities and duties.
- Location of H<sub>2</sub>S safety equipment.
- Other parts of the "H<sub>2</sub>S Contingency Plan" that should be reviewed.

NOTE: A record of attendance must be kept for weekly drills and training sessions.

## **IX. HYDROGEN SULFIDE TRAINING CURRICULUM**

(FOR EMPLOYERS, VISITORS, AND CONTRACTORS)

EACH PERSON WILL BE INFORMED ON THE RESTRICTIONS OF HAVING BEARDS AND CONTACT LENS. THEY WILL ALSO BE INFORMED OF THE AVAILABILITY OF SPECTACLE KITS.

AFTER THE H2S EQUIPMENT IS RIGGED UP, ALL IN SCOPE PERSONNEL WILL BE H2S TRAINED AND PUT THROUGH A DRILL. ANY DEFICIENCIES WILL BE CORRECTED.

Training Completion cards are good for one year and will indicate date of completion or expiration. Personnel previously trained on another facility and visiting, must attend a "supplemental briefing" on H2S equipment and procedures before beginning duty. Visitors who remain on the location more than 24 hours must receive full H2S training given all crew members. A "supplemental briefing" will include but not be limited to: Location of respirators, familiarization with safe briefing areas, alarms with instruction on responsibilities in the event of a release and hazards of H2S and (SO<sub>2</sub>, if applicable). A training and drill log will be kept.

Topics for full H2S training shall include the following equipment if on location, but not be limited to the following:

1. **Brief Introduction on H2S**
  - A. Slide or Computer presentation (If Available)
  - B. H2S material will be distributed
  - C. Re-emphasize the properties, toxicity, and hazards of H2S
  - D. Source of SO<sub>2</sub> (if applicable)
  
2. **H2S Detection**
  - A. Description of H2S sensors
  - B. Description of warning system (how it works & it's location)
  - C. Actual location of H2S sensors
  - D. Instruction on use of pump type detector (Gastec)
  - E. Use of card detectors, ampoules, or dosimeters
  - F. Use of combustible gas detector
  - G. Other personnel detectors used
  - H. Alarm conditions I & II,
  - I. SO<sub>2</sub> alarms (if applicable)

3. **H2S Protection**
  - A. Types of breathing apparatus provided (30-minute SCBA & 5-minute SCBA (with voice diaphragms for communication if supplied)
  - B. Principle of how breathing apparatus works
  - C. Demonstration on how to use breathing apparatus
  - D. Location of breathing apparatus
  
4. **Cascade System**
  - A. Description of cascade system
  - B. How system works
  - C. Cascade location of rig with reference to briefing areas
  - D. How to use cascade system (with 5-minute hose work line units & refill, if supplied)
  - E. Importance of wind direction and actual location of Windsocks
  - F. Purpose of compressor/function (if one is on site)
  
5. **H2S Rescue and First Aid**
  - A. Importance of wind direction
  - B. Safe briefing area
  - C. Buddy system
  - D. H2S symptoms
  - E. Methods of rescue
  
6. **Hands on Training**
  - A. Donning/familiarization of SCBA 30-minute unit
  - B. Donning/familiarization of SKADA 5- MIN. Packs
  - C. Familiarization of cascades
  - D. Use of O2 resuscitator
  - E. Alarm conditions - upwind briefing areas, etc...
  - F. Duties and responsibilities of all personnel
  - G. Procedures for evacuation
  - H. Search and Rescue teams
  
7. **Certification**
  - A. Testing on material covered

### TOTAL SAFETY US INC., FIT TEST

*X. EMPLOYEE INFORMATION*

Employee Name: \_\_\_\_\_ Date: \_\_\_\_\_

Date of Employee Medical Evaluation: \_\_\_\_\_

Medical Status (circle):    Unrestricted    Limitations on Use    Use Not  
Authorized

RESPIRATOR INFORMATION

Respirator Type (Dustmask, SCBA, etc): \_\_\_\_\_

Brand: \_\_\_\_\_

Size: (circle):        XS                  S                  M                  L                  XL

FIT TEST INFORMATION

Type of Fit Test Performed:

**Quantitative**

Porta Count

Fittester 3000

Fit Factor: \_\_\_\_\_

Fit Factor: \_\_\_\_\_

**Qualitative**

Irritant Smoke

Isoamyl Acetate (Banana Oil)

Saccharin

Bitrex

Passed / Failed

Passed / Failed

Passed / Failed

Passed / Failed

I hereby certify that this fittest was conducted in accordance with the OSHA Fit Testing Protocols found in Appendix A of 1910.134.

Fit Tester Name (Print): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**XI. H<sub>2</sub>S SAFETY SERVICES**

HYDROGEN SULFIDE SAFETY PACKAGE – Contained on location in Total Safety H<sub>2</sub>S Equipment Trailer, unless otherwise noted:

**RESPIRATORY SAFETY SYSTEMS**

**QTY DESCRIPTION**

- 12 30-Minute Pressure Demand SCBA  
(4-Primary Safe Briefing Area, 4-Secondary Safe Briefing Area, 4-floor with one of these for derrick man)
- 9 Hose Line 5-minute Work Unit w/Escapes Cylinder (1 in derrick, 6 on drill floor, 1 in mud pit wt area, 1 in shaker area)

The following shall be part of the package if requested by the MRC Foremen (at least one trailer with cascade system is required to be located in the MRC Magnolia asset for use as needed)

- 1 Breathing air cascade of 10 bottles w/regulator
- 2 Refill lines to refill 30-minute units on location
- 1 6-Man manifold that can be rigged up to work area on floor, if needed
- 6 25 foot hose lines
- 2 50 foot hose lines
- 100 Feet of hose line to rig cascade up to 12 man manifold on floor
- 12 30-minute Self Contained Breathing apparatus

**DETECTION AND ALARM SAFETY SYSTEM**

- 1 H<sub>2</sub>S Fixed Monitor w/8Channels (Loc determined at rig up) suggested.  
(Mud pit area, shaker area, bell nipple area, floor/driller area, & outside quarters)
- 5 H<sub>2</sub>S Sensors
- 3 Explosion Proof Alarms (Light and Siren)  
(1 on floor, 1 in work area, 1 in trailer area where quarters are located)
- 2 Personal H<sub>2</sub>S monitors
- 1 Portable Tri-Gas Hand Held Meter (O<sub>2</sub>, LEL, H<sub>2</sub>S)
- 1 Sensidyne/Gastech Manual Pump Type Detector
- 8 Boxes H<sub>2</sub>S Tubes Various Ranges
- 2 Boxes SO<sub>2</sub> Tubes Various Ranges
- 1 Calibration Gas
- 1 Set Paper Work for Records: Training, Cal, Inspection, other

**ADDITIONAL SAFETY RELATED EQUIPMENT**

**QTY DESCRIPTION**

2	Windssocks with Pole and Bracket
1	Set Well Condition Sign w/Green, Yellow, Red Flags
1	Primary Safe Briefing Area Sign
1	Secondary Safe Briefing Area Sign
6	Operating Condition Signs for Work Areas & Living Quarters

**TRAILER WITH BREATHING AIR CASCADE WILL  
ALSO INCLUDE THE FOLLOWING:**

This equipment will be part of the H2S equipment stored in the trailer, when on location

1	First aid kit
1	Fire Blanket
1	Eye wash station
2	Safety Harness w/150' safety line

**XII. EMERGENCY PHONE NUMBERS (Updated March 18, 2009)**

**EMERGENCY PHONE NUMBERS**

MRC Energy Co. Emergency Phone #  
 MRC Energy Co. Permian Operations Phone-----  
**MRC Energy Co. Production**  
 113 Daw Rd  
 Mansfield LA 71052

<b>Title</b>	<b>Names</b>	<b>Phone</b>	<b>Cell</b>
Operations Manager			
Operation Supt.			
Operations Supervisor			
Operations Supervisor			
Office Supervisor			
HSE			
Scheduler Planner			

**Hydrogen Sulfide Safety Consultants**

Total Safety W. Bender Blvd. Hobbs, NM	575-392-2973	After Hours 24 Hour Call Center Through Office Number
Tommy Throckmorton Operations Manager	575-392-2973	940-268-9614
Rodney Jourdan Sales Contact	575-392-2973	432-349-3928

**MRC Energy Co. MEDICAL RESPONSE PLAN AND IT'S MEDICAL PROTOCOLS WILL BE FOLLOWED**

**MEDICAL COORDINATOR # -----**

[Emergency Numbers & Directions](#)

**Hospitals (911)**

<b>Artesia General Hospital 702 N. 13<sup>th</sup> St. Artesia, NM 88210</b>	<b>Main Phone Number</b>	<b>575-748-3333</b>
<b>Nor-Lea General Hospital 1600 N. Main Ave. Lovington, NM 88260</b>	<b>Main Phone Number</b>	<b>575-396-6611</b>
<b>Lea Regional Medical Center 5419 N. Lovington Hwy Hobbs, NM 88240</b>	<b>Main Phone Number</b>	<b>575-492-5260</b>
<b>Carlsbad General Hospital 2430 W. Pierce St. Carlsbad, NM</b>	<b>Main Phone Number</b>	<b>575-887-4100</b>
<b>Lovelace Regional Hospital 117 E. 19<sup>th</sup> St Roswell, NM 88201</b>	<b>Main Phone Number</b>	<b>575-627-7000</b>
<b>Winkler Co. Memorial Hospital 821 Jeffee Dr. Kermit, Texas 79745</b>	<b>Main Phone Number</b>	<b>432-586-8299</b>
<b>Reeves County Hospital 2323 Texas St. Pecos, Texas 79772</b>	<b>Main Phone Number</b>	<b>432-447-3551</b>

**State Police (911)**

<b>Texas DPS Loving co. 225 N.Pecos Mentone, Texas 79754</b>	<b>Office Number</b>	<b>432-377-2411</b>
<b>Texas DPS Winkler Co. 100 E Winkler Kermit, Texas 79745</b>	<b>Office Number</b>	<b>432-586-3465</b>
<b>Texas DPS Pecos Co. 148 N I-20 Frontage RD Pecos, Texas 79772</b>	<b>Office Number</b>	<b>432-447-3532</b>
<b>New Mexico State Police 3300 W. Main St Artesia, NM</b>	<b>Office Number</b>	<b>575-748-9718</b>
<b>New Mexico State Police 304 N. Canyon St Carlsbad, NM 88220</b>	<b>Office Number</b>	<b>575-885-3137</b>
<b>New Mexico State Police 5100 Jack Gomez Blvd. Hobbs, NM 88240</b>	<b>Office Number</b>	<b>575-392-5588</b>

**Local Law Enforcement (911) (Sheriff)**

<b>Reeves Co. Sheriff 500 N. Oak ST Pecos, Texas 79722</b>	<b>Office Number</b>	<b>432-445-4901</b>
<b>Winkler Co. Sheriff 1300 Bellaire St. Kermit, Texas 79745</b>	<b>Office Number</b>	<b>432-586-3461</b>
<b>Loving Co. Sheriff Courthouse Mentone, Texas</b>	<b>Office Number</b>	<b>432-377-2411</b>
<b>Lea Co. Sheriff 1417 S. Commercial St. Lovington, NM 88260</b>	<b>Office Number</b>	
<b>Eddy Co. Sheriff 305 N 7th St. Artesia, NM 88210</b>	<b>Office Number</b>	<b>575-766-9888</b>
<b>Eddy Co. Sheriff 305 N 7th St. Carlsbad, NM 88220</b>	<b>Office Number</b>	<b>575-746-9888</b>

Federal & State Agencies

<b>OSHA Lubbock Area Office</b> 1205 Texas Av. Room 806 Lubbock, Texas 79401	<b>Main Number</b>	<b>806-472-7681 EXT 7685</b>
<b>New Mexico Environment Department</b> 400 N Pennsylvania Roswell, NM 88201	<b>Joe Fresquez</b>	<b>575-623-3935</b>
<b>Texas Railroad Commission</b> Midland, Texas	<b>Main Number</b>	<b>844-773-0305</b>
<b>BLM Carlsbad, NM Field Office</b> 620 E. Green ST Carlsbad, NM 88220	<b>Main Number</b>	<b>575-234-5972</b>
<b>BLM Hobbs Field Station</b> 414 W. Taylor Rd. Hobbs, NM 88240	<b>Main Number</b>	<b>575-393-3612</b>
<b>BLM Roswell District Office</b> 2909 W. Second St. Roswell, NM 88201	<b>Main Number</b>	<b>575-627-0272</b>
<b>TECQ Texas Commission on Environmental Quality</b>	<b>Main Number</b>	<b>800-832-8224</b>
<b>New Mexico OCD</b>		
<b>U.S. Environmental Protection Agency Region 6</b> Texas/New Mexico	<b>Main Number</b>	<b>214-655-2222</b>
<b>National Response Center Toxic Chemicals &amp; Oil Spills</b>	<b>Main Number</b>	<b>800-424-8802</b>

**Rig Company**


### XIII. EVACUATION OF THE GENERAL PUBLIC

The procedure to be used in alerting nearby persons in the event of any occurrence that could pose a threat to life or property will be arranged and completed with public officials in detail, prior to drilling into the hydrogen sulfide formations.

In the event of an actual emergency, the following steps will be immediately taken:

1. The MRC Energy Co.'s representative will dispatch sufficient personnel to immediately warn each resident and transients down-wind within radius of exposure from the well site. Then warn all residence in the radius of exposure. Additional evacuation zones may be necessary as the situation warrants.
2. The MRC Energy Co.'s representative will immediately notify proper authorities, including the Sheriff's Office, Highway Patrol, and any other public officials as described above and will enlist their assistance in warning residents and transients in the calculated radius of exposure.
3. The MRC Energy Co.'s representative will dispatch sufficient personnel to divert traffic in the vicinity away from the potentially dangerous area. A guard to the entrance of the well site will be posted to monitor essential and non essential traffic.
4. General:
  - A. The area included within the radius of exposure is considered to be the zone of maximum potential hazard from a hydrogen sulfide gas escape. Immediate evacuation of public areas, in accordance with the provisions of this contingency plan, is imperative. When it is determined that conditions exist which create an additional area (beyond the initial zone of maximum potential hazard) vulnerable to possible hazard, public areas in the additional hazardous area will be evacuated in accordance with the contingency plan.
  - B. In the event of a disaster, after the public areas have been evacuated and traffic stopped, it is expected that local civil authorities will have arrived and within a few hours will have assumed direction of and control of the public, including all public areas. MRC Energy Co. will cooperate with these authorities to the fullest extent and will exert every effort by careful advice to such authorities to prevent panic or rumors.
  - C. MRC Energy Co. will dispatch appropriate management personnel at the disaster site as soon as possible. The company's personnel

will cooperate with and provide such information to civil authorities as they might require.

- D. One of the products of the combustion of hydrogen sulfide is sulfur dioxide (SO<sub>2</sub>). Under certain conditions this gas may be equally as dangerous as H<sub>2</sub>S. A pump type detector device, which determines the percent of SO<sub>2</sub> in air through concentrations in ppm, will be available. Although normal air movement is sufficient to dissipate this material to safe levels, the SO<sub>2</sub> detector should be utilized to check concentrations in the proximity of the well once every hour, or as necessary and the situation warrants. Also, if any low areas are suspected of having high concentrations, personnel should be made aware of these areas, and steps should be taken to determine whether or not these low areas are hazardous.