PRODUCER SERVICES

Department of Transportation

Onshore Oil Pipeline Response Manual

CORE PLAN

Prepared By:

1730 Coteau Road
Houma, LA 70364
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985-851-7480
consulting@esandh.com
www.esandh.com

Prepared in accordance with:
Code of Federal Regulations; Title 49, part 194

NCP/ACP CERTIFICATION FORM

I hereby certify on behalf of **Discovery Producer Services** that this response plan is consistent with the National Contingency Plan (NCP) (400 CFR part 300) and each applicable Area Contingency Plan (ACP) in our operating environment as required by 49CFR part 194.107. The applicable Area Contingency Plans for our operating environment include:

- USCG One Gulf Plan
- MSO Morgan City Geographic Response Plan of the One Gulf Plan

Signature:	
Name:	
Title:	
Date:	

INFORMATION SUMMARY

OWNER/OPERATOR INFORMATION	
Name:	Discovery Producer Services
Street Address:	Larose Gas Plant 1474 Highway 24 P.O. Box 1699
City/State/Zip:	Larose, LA 70373
Contact Name:	Dale Fincher
Contact Title:	Pipeline Supervisor / Q.I.
Contact Telephone #:	985-798-5907 (O) / 985-859-7669 (M)

EMPLOYEE CONTACT LIST

This pipeline is monitored and operated by control room personnel on a 24-Hour Basis. Any detection of abnormal operations will prompt a notification to the Q.I. or A.Q.I. notated below.

NAME & TITLE	WORK #	MOBILE #	HOME #
Dale Fincher Pipeline Supervisor **Q.I.**	985-798-5907	(b) (6)	
Raymond Gonzales Pipeline COM (Onshore) **Q.I.**	985-798-5910		
Calbert Dufrene Manager of DPS Operations **Q.I.**	985-798-5925		
Kirk Lee Pipeline COM (Offshore) **Q.I.**	985-798-5906		
Darryl Benoit Operations Supervisor	985-798-5919		
Phil Roddy Maintenance Supervisor	985-798-5959		
Charles Folse Safety Representative	985-798-5918		
Jerry Knight Manager of Tech Services	985-798-5917		

EMPLOYEE CONTACT LIST (CONTINUED)		
James Adams Maintenance COM	985-798-5924	(b) (6)
Judy Dyson Lead FOA	985-798-5916	

Tulsa Gas Control Information	
1-800-635-7400 1-918-574-9316	
Control Room	
Larose Control Room Larose Control Room Alternate #	985-798-5902 985-258-1649
Paradis Control Room Paradis Control Room Alternate #	985-758-4111 985-258-8333

RESPONSE ZONES INCLUDED IN THIS PLAN

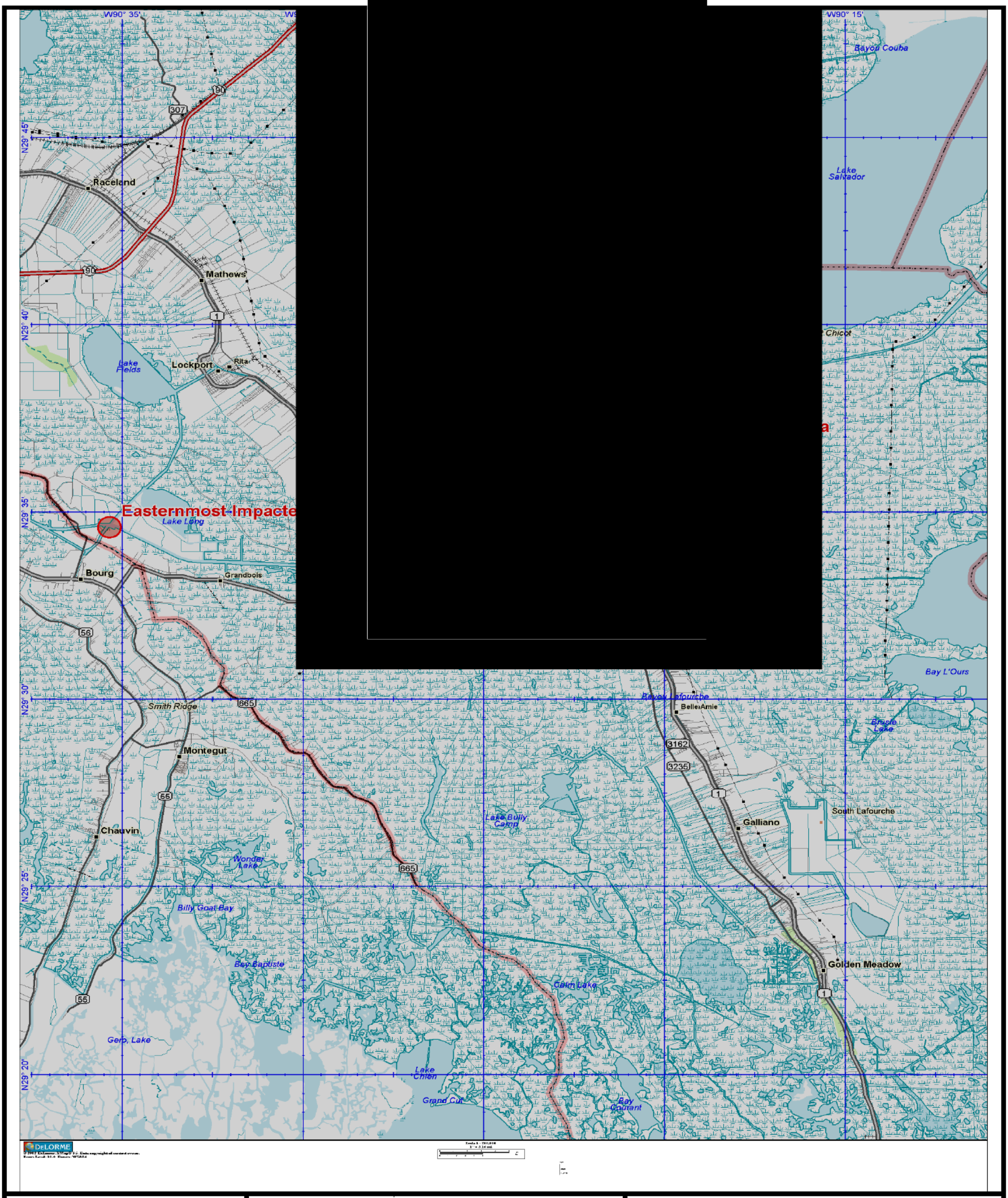
Zone #	Name	Parish(s)	State	Zone Description
2	NGL	Lafourche & St. Charles	LA	(18”), (14”), and (10”) NGL Pipeline running from the Larose Processing Plant to the Paradis Plant.

SIGNIFICANT AND SUBSTANTIAL HARM DETERMINATION

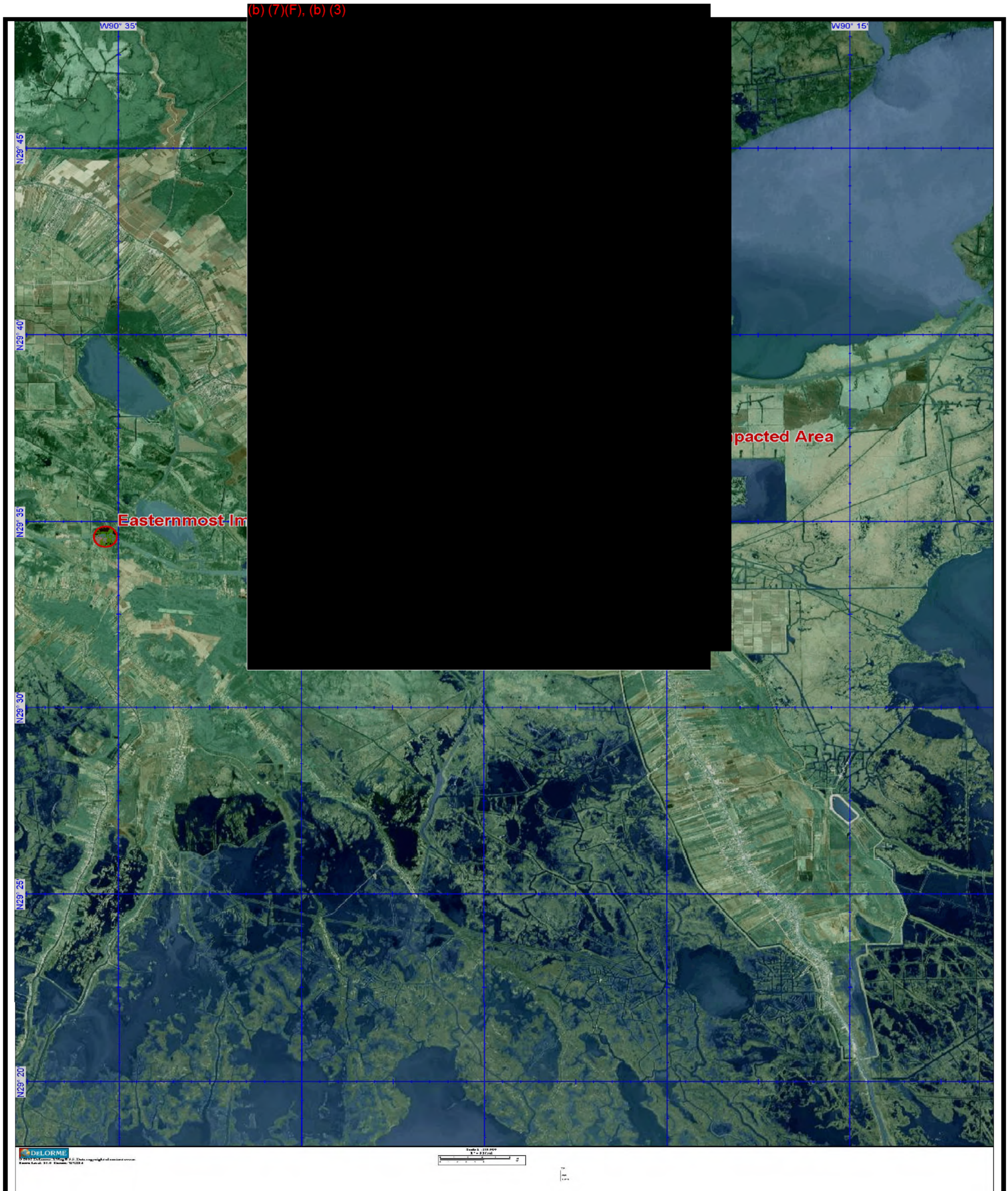
This response zone has been determined to present a threat of significant and substantial harm to the environment in the event of a discharge of oil into or on the navigable waters or adjoining shorelines as described in 49 CFR 194.103. The NGL pipeline varies between sections of 18", 14", and 10" in diameter and although it is less than 10 miles in length, it is part of a larger system that exceeds the 10 mile criteria. Additionally, this response zone poses a specific threat under these regulations for the following reason:

- The pipeline is located within a (1) mile radius of potentially affected environmentally sensitive areas, and could reasonably be expected to reach these areas.

(b) (7)(F), (b) (3)



ES&H The Total Assurance Team / FOREFRONT Emergency Management	X	Potential Spill Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL



ES&H The Total Assurance Team / FOREFRONT Emergency Management	X	Potential Spill Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL

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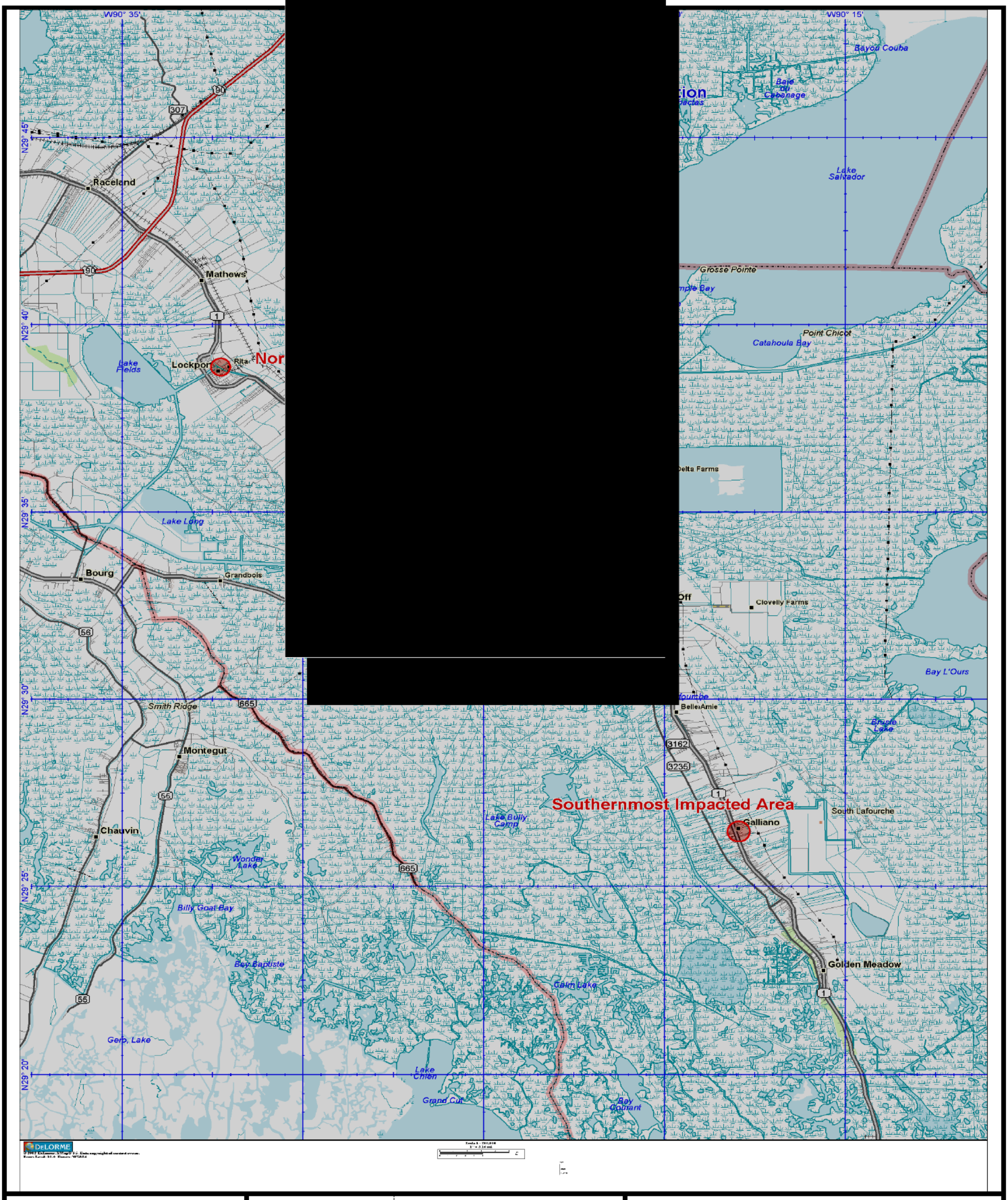

ES&H The Total Assurance Team / FOREFRONT Emergency Management	X	Potential Spill Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL

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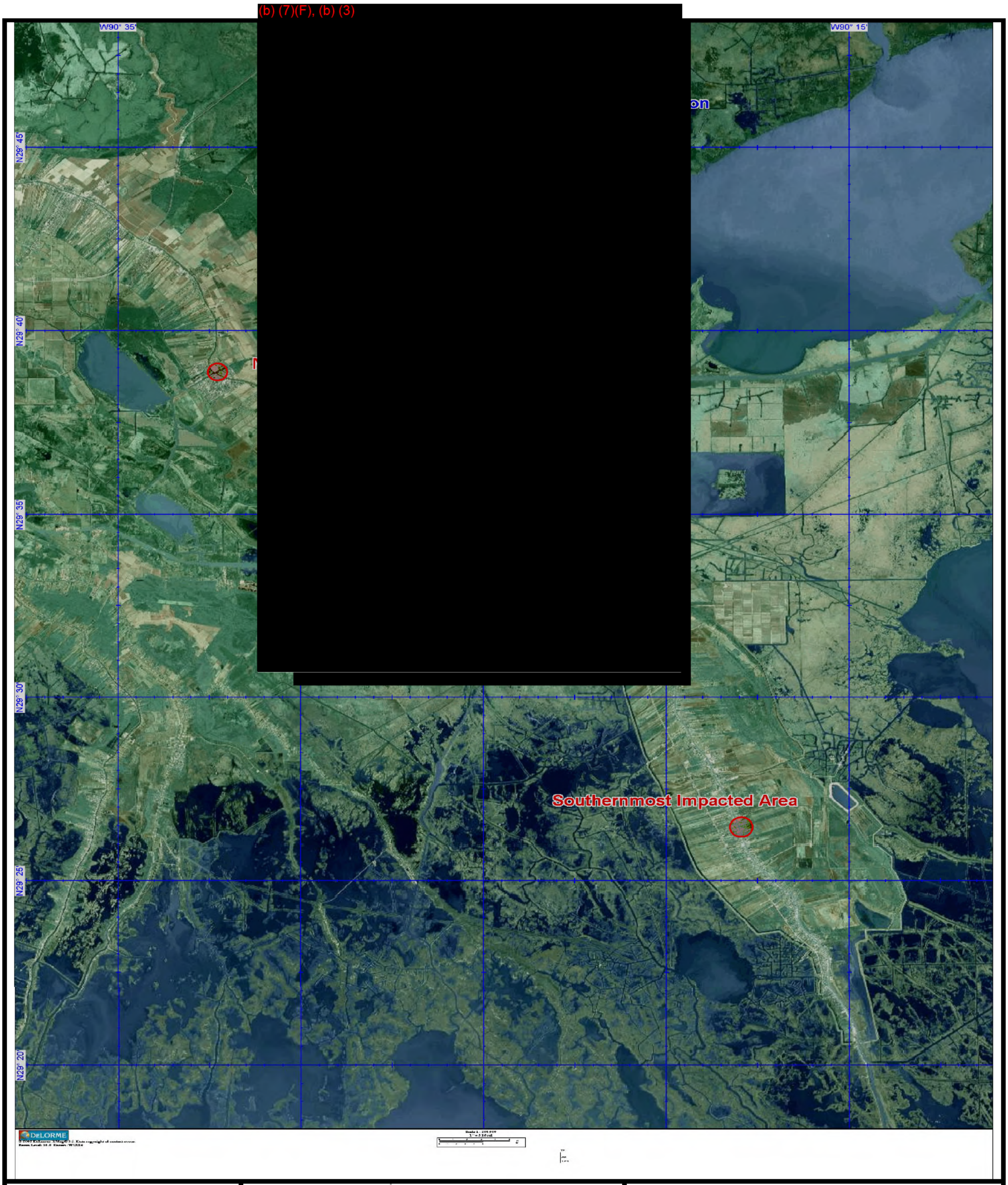
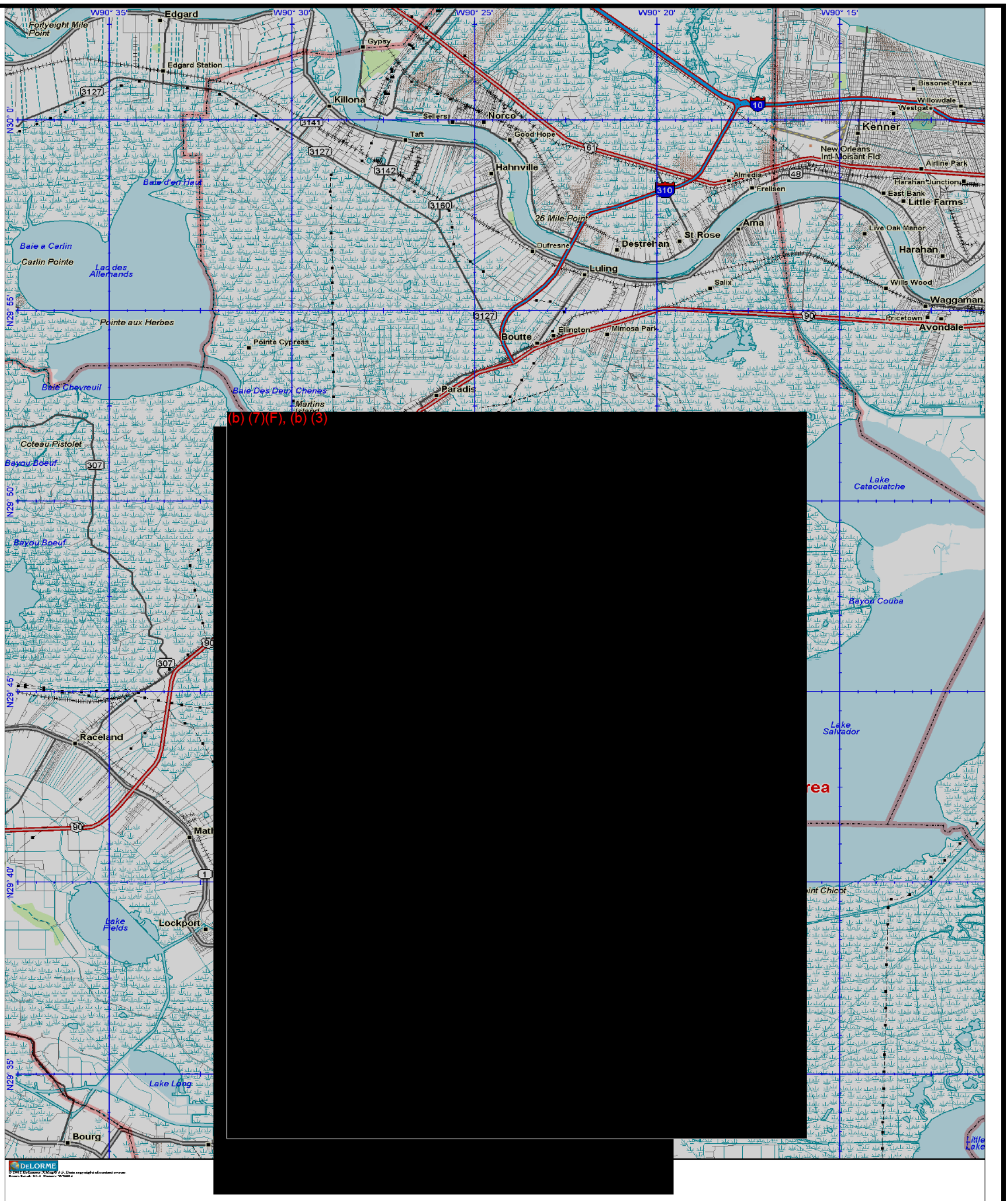
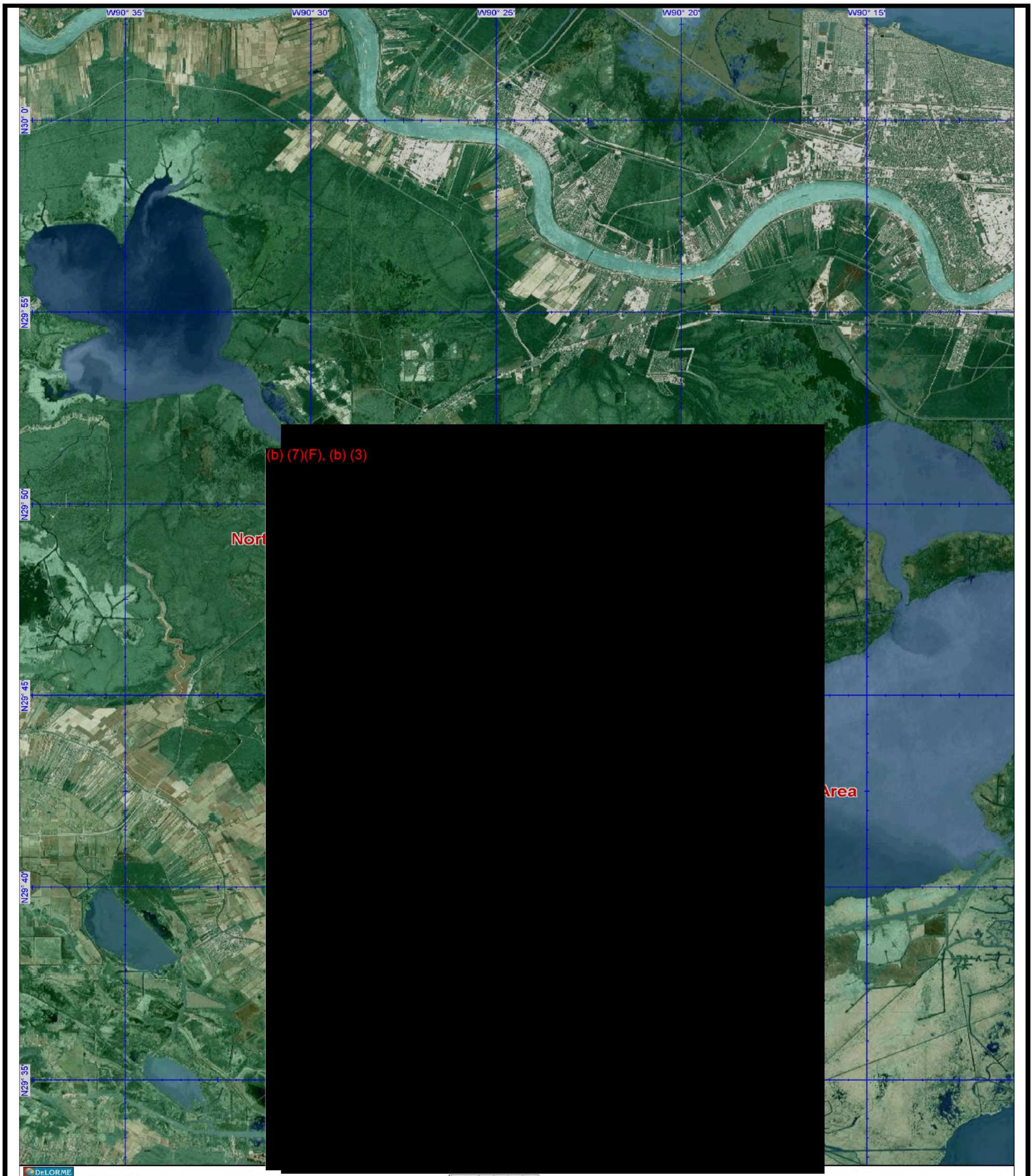


ES&H The Total Assurance Team. FOREFRONT Emergency Management	X	Potential Spill Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL



(b) (7)(F), (b) (3)

ES&H The Total Assurance Team / FOREFRONT Emergency Management	X	Potential Spill Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL



ES&H The Total Assurance Team · FOREFRONT Emergency Management	X	Potential Spill Site

DISCOVERY PRODUCER SERVICES
DOT ONSHORE OIL PIPELINE
RESPONSE MANUAL

ZONE 2 WORST CASE DISCHARGE INFORMATION

Formula: (MRT + MST) X MFR + LLD = WCD

MRT= (b) (7)(F), (b) (3)
MST=
MFR=
LLD=
WCD=

(b) (7)(F), (b) (3)

Drainage Calculation for Individual Line Segments

Formula: (Interior Diameter in inches)^2 / 1029.5 x Length in feet = Barrels
1 Mile= 5,280 feet

(b) (7)(F), (b) (3)

TOTAL LINE VOLUME

(b) (7)(F), (b) (3)

This facility does not contain a breakout tank. Also, this facility has not had any previous spills. Therefore, there are no additional worst case discharges to be calculated. According to the drainage calculation for the individual line segments, the worst case discharge is (b) (7)(F), (b) (3)

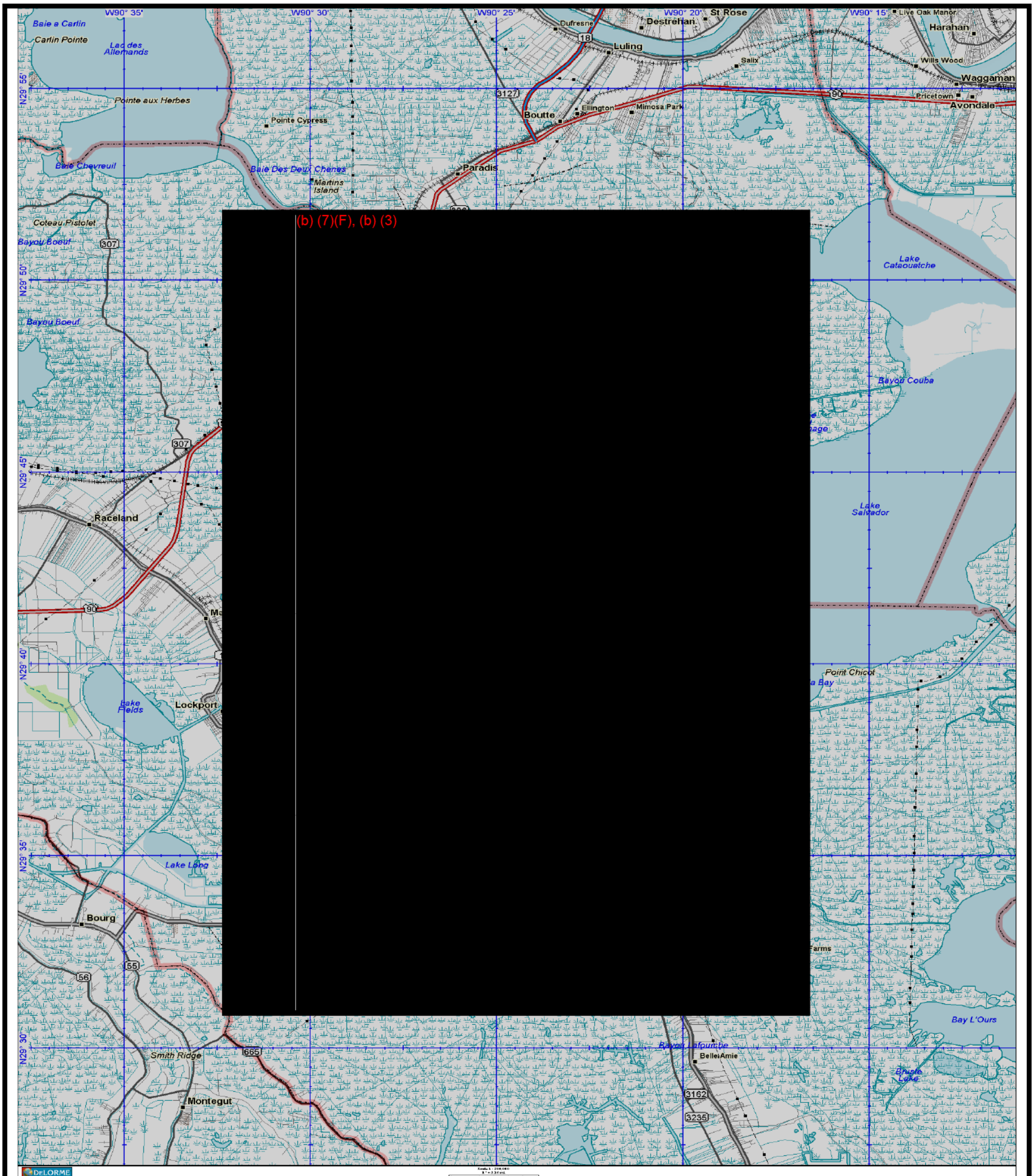
RESPONSE ZONE DESCRIPTION

Response Zone 2 is identified by Discovery Producer Services as NGL. This zone contains one NGL pipeline running from the **Larose Processing Plant to the Paradis Plant.** This line runs approximately 22.93 miles in Louisiana through Lafourche and St. Charles Parishes. The geographic region this pipeline passes through contains areas of environmental and economic sensitivity. The general region is described in the maps and charts that are included on the following pages. The legend below identifies key pipeline segments and systems and corresponds to the overview map on the following page. More specific information related to environmental and economic areas of concern can be found later in the response plan.

KEY PIPELINE SEGMENT AREAS AND SYSTEMS

	LAROSE PROCESSING PLANT
	(b) (7)(F), (b) (3) [redacted]
	PARADIS PLANT
#1	(b) (7)(F), (b) (3) [redacted]
#2	
Site A	
Site B	
Site C	
Site D	

- **Please see the site map and text on the following pages for locations and more specific detail on these systems.**



ES&H The Total Assurance Team / FOREFRONT Emergency Management	Valve Site	**DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL**

ES&H The Total Assurance Team

FOREFRONT Emergency Management

Valve Site

DISCOVERY PRODUCER SERVICES
DOT ONSHORE OIL PIPELINE
RESPONSE MANUAL

NOTIFICATIONS PROCEDURES

I. The following table contains a list of the government agencies that have potential jurisdiction over an incident in the Discovery Producer Services operating area:

AGENCY NAME	24- HOUR TELEPHONE #
National Response Center	800-424-8802
Louisiana State Police	225-925-6595
Louisiana Department of Environmental Quality	225-925-6595
Environmental Protection Agency	866-372-7745
US Coast Guard Sector New Orleans	504-365-2200
US Coast Guard MSU Morgan City	985-380-5320
US Coast Guard MSU Houma	985-850-6400
Louisiana Oil Spill Coordinators Office	Hotline: 225-200-1921 Office: 225-925-6606
Louisiana Department of Wildlife and Fisheries	225-765-2800
Office of Emergency Preparedness Lafourche Parish	985-537-7603
Office of Emergency Preparedness St. Charles Parish	985-783-5050

II. In the event of an incident, the qualified individual or his delegate will make the following notifications in the order given below.

Entity	Phone #	Status
Louisiana State Police	225-925-6595	As Required within 1 Hour
Lafourche Local Emergency Planning Committee St. Charles Local Emergency Planning Committee	985-537-7603/ 985-637-5195 985-783-5050	As Required within 1 Hour
Louisiana Department of Environmental Quality	225-925-6595	As Required within 1 Hour
National Response Center	800-424-8802	As Required
U.S.C.G. MSU Houma U.S.C.G. Sector New Orleans U.S.C.G. MSU Morgan City	985-850-6400 504-365-2200 985-380-5320	As Required
Louisiana Oil Spill Coordinators Office (LOSCO)	Hotline: 225-200-1921 Office: 225-925-6606	As Required
ES&H (Contracted OSRO)	877-437-2634	When clean-up is required
Internal Corporate personnel as given in the table below	As warranted by severity of incident	As Required
Louisiana Department of Natural Resources (DNR)	225-342-5540	As Required

III. In the event of an incident, the personnel discovering the spill shall notify the Qualified Individual or Alternate Qualified Individual who will ensure the following are notified as is determined to be appropriate:

EMPLOYEE CONTACT LIST			
This pipeline is monitored and operated by control room personnel on a 24-Hour Basis. Any detection of abnormal operations will prompt a notification to the Q.I. or A.Q.I. notated below.			
NAME & TITLE	**WORK #**	**MOBILE #**	**HOME #**
Dale Fincher Pipeline Supervisor **Q.I.**	985-798-5907	(b) (6)	

EMPLOYEE CONTACT LIST (CONTINUED)		
Raymond Gonzales Pipeline COM (Onshore) **Q.I.**	985-798-5910	(b) (6) [redacted]
Calbert Dufrene Manager of DPS Operations **Q.I.**	985-798-5925	
Kirk Lee Pipeline COM (Offshore) **Q.I.**	985-798-5906	
Darryl Benoit Operations Supervisor	985-798-5919	
Phil Roddy Maintenance Supervisor	985-798-5959	
Charles Folse Safety Representative	985-798-5918	
Jerry Knight Manager of Tech Services	985-798-5917	
James Adams Maintenance COM	985-798-5924	
Judy Dyson Lead FOA	985-798-5916	

Tulsa Gas Control Information

1-800-635-7400
1-918-574-9316

Control Room

Larose Control Room Larose Control Room Alternate #	985-798-5902 985-258-1649
Paradis Control Room Paradis Control Room Alternate #	985-758-4111 985-258-8333

IV. In the event of an incident, the following procedures will be used by the facility personnel to notify the Qualified Individual(s):

Step #	Procedure
1.	The employee discovering the incident will immediately notify the Qualified Individual.
2.	The Qualified Individual shall be notified using the communication methods given in the table below.
3.	After the initial notifications, all applicable employees shall notify the Qualified Individual of any changes in the status of the incident as soon as possible given the circumstances.

V. In the event of an incident, the following methods of communication shall be used:

Priority	Method of Communication Used
Primary Method:	The primary method of communication used for all notifications will be intrinsically safe hand-held radios.
Secondary Method	The secondary method of communication will be via satellite telephone.

Initially, communications on the spill site will be provided by the intrinsically safe hand-held radios and the satellite phones by Discovery Producer Services. At the point where the Operations Section Chief determines it is necessary to acquire more or improved communications, he will instruct the Logistics Section Chief to acquire additional resources from the OSRO, ES&H. At the point, a Communication Resource Unit Leader will be established at the staging area and placed in charge of distribution of the communication equipment. The number of individual resources acquired will depend upon the nature of the incident. In the case of the worst case discharge scenarios for this pipeline typical packages would include:

- ES&H Consulting Services, Inc. – (15) Motorola hand-held radios

The following procedures have been established in order to ensure proper communications are maintained between the field responders and the command post:

1. All zone supervisors will utilize (2) hand-held radios to ensure proper communications.
2. One radio shall be kept on Channel 1 for communications with the Command Post as an alternative to the primary method of cellular phone listed above, while the other radio will be kept on Channel 2 for communications with the Field Foreman.
3. All responders in the field will use only Channel 2 for communication, while the command post will communicate with the zone supervisors on Channel 1 as an alternative to the primary method of cellular phone and monitor Channel 2.

PROCEDURES TO ESTABLISH AND MAINTAIN COMMUNICATIONS DURING RESPONSE OPERATIONS

Once a spill event has occurred, the ES&H Logistics Section Chief will appoint a Communications Unit Leader as part of the logistics section of the ICS Structure. This individual will be tasked with establishing and maintaining effective communications throughout the necessary response period. As described by the NIMMS ICS System, this positions duties will include:

a. **Determining unit personnel needs** including personnel to check radios in and out and ensure proper maintenance or repair in off hours;
b. **Advise on communications capabilities/limitations** including regular briefings to the Logistics Section Chief;
c. **Prepare and Implement the Incident Radio Communications Plan (ICS 205)** including appropriate distribution to all personnel;
d. **Establish appropriate communications distribution and maintenance locations** including areas at or near the primary staging areas for response personnel;
e. Recover Equipment.

During a worst case discharge as described by this response plan, it is assumed that the Communication Unit Leader described above will be required to mobilize communications equipment from 1 or both of the contractors given in this section. Once those resources are acquired, the Communication Unit Leader will accomplish the following objectives in the order given below:

1. Set up a distribution center near the staging area for the appropriate distribution to response personnel including safety personnel, supervisors, foreman, and technicians working in isolated areas.
2. Conduct a pre-work briefing with response personnel in the proper operation and limitations of the communications equipment.
3. Distribute radios to ICS personnel as appropriate.
4. Develop ICS 205 - **Incident Radio Communications Plan** in order to establish communications protocols.
5. Oversee status and effectiveness of response communications in order to address deficiencies and anticipate communications problems.

VI. In the event of an incident, the following information shall, at a minimum, be given in the initial and any subsequent notifications given to all parties (please see the spill report forms in each response zone appendix):

Information necessary for all notifications concerning any incident	
1.	Name of pipeline
2.	Time of discharge
3.	Location of discharge
4.	Name of product involved
5.	Reason for discharge
6.	Estimated volume of oil discharged
7.	Weather conditions on scene including wind conditions, sea conditions, tide conditions and cloud cover
8.	Actions taken or planned by persons on scene including information about any offsite protective actions
9.	Name and contact information for the responsible party
10.	Date/Time the incident was discovered
11.	Date and Time the incident was secured (if available)
12.	Information pertaining to any fires, injuries or fatalities if they apply to a given incident

SPILL DETECTION AND ON-SCENE SPILL MITIGATION PROCEDURES

I. The following methods would be used to initially detect an incident or substantial threat of an incident (please see each response zone appendix for more detail on each system):

METHODS TO DISCOVER AN ACTUAL INCIDENT	
Method	**Description**
1.	As a result of analyzing remote communication link information at the control center. The remote communication link system is capable of monitoring high and low pressure-sensing devices that are positioned throughout the pipeline. Any deviations from the normal operating conditions that may represent a pipeline rupture or leak will be detected.
2.	Reports or inspections from company personnel; Company personnel routinely monitor pipeline gauges and/or pipeline pressure indicators to insure proper operating pressure is being maintained on the pipeline.
3.	Reports from the public or public officials.
4.	Periodic inspections of pipeline right-of-ways via air, water and land transportation.
5.	Reports from field personnel or a report from the control center.
6.	As a result of previous experience in dealing with a given condition.

ABNORMAL OPERATIONS THAT POSE A THREAT FOR A WORST CASE DISCHARGE	
OPERATION	**PROCEDURES TO MITIGATE OR ELIMINATE THREAT**
Unauthorized Dredging Operations in Pipeline Right-of-Way	All pipelines will be properly marked along the right-of-way to inform people working in the area of the existence of the pipeline. All dredging operations will be properly surveyed and identified by Discovery Producer Services personnel to ensure any dredging operations do not threaten the pipeline's integrity. Additionally, all pipelines operated by Discovery Producer Services are included in the Louisiana One Call checking program.
Catastrophic Weather Event (i.e. Hurricane)	Discovery Producer Services monitors regional weather forecast in order to be prepared for any predictable weather related event. When severe weather, such as a hurricane, is predicted, Discovery Producer Services personnel will monitor the event and determine the appropriate response in accordance with the provisions of the Discovery Producer Services Severe Weather Plan. In most cases the offshore suppliers of oil to the facility will shut-in production thereby terminating the flow of product during severe weather events.
(b) (7)(F), (b) (3) [redacted]	
Vessel Mooring in Pipeline Right-of-Way	All pipelines will be properly marked along the right-of-way to inform people working in the area of the existence of the pipeline. Furthermore, navigational aides are maintained by Discovery Producer Services in areas where large vessels frequent.

ABNORMAL OPERATIONS THAT POSE A THREAT FOR A WORST CASE DISCHARGE CONTINUED

Procedures for dealing with additional abnormal operations as described by 49 CFR Part 195.402(d) are included in the *Procedural Manual for Operations, Maintenance, and Emergencies* maintained by Discovery Producer Services. This procedural manual includes procedures for dealing with abnormal operations to include:

1. Responding to, investigating, and correcting the cause of:
    1. Unintended closure of valves or shutdowns
    2. Increase or decrease in pressure or flow rate outside normal operating limits
    3. Loss of communications
    4. Operation of any safety device
    5. Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property
2. Checking variation from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation.
3. Correcting variations from normal operation of pressure and flow equipment and controls.
4. Notifying responsible pipeline personnel when notice of an abnormal operation is received.
5. Periodically reviewing the response of pipeline personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

ABNORMAL OPERATIONS THAT POSE A THREAT FOR A WORST CASE DISCHARGE CONTINUED (AS GIVEN IN THE O & M MANUAL)

OPERATION	PROCEDURES TO MITIGATE OR ELIMINATE THREAT
Unintended Closure of Valves or Shutdowns	• Inspect the valve to determine the cause of the closure or shutdown; • Reset the valve if no problem is found; • If a problem is found, initiate appropriate repair procedures; • Notify the appropriate personnel to exchange necessary information regarding flow changes, pressures, etc. to other parties on the pipeline system as required; • Document the abnormal operations; and • Notify Operations when the condition has been remedied and that pipeline operations can resume.
Increase or Decrease in Pressure or Flow Rate Outside Normal Operating Limits	• Contact the customer and/or supplier facilities connected to the pipeline system, analyze relevant data, and issue appropriate instructions; • Dispatch pipeline personnel to patrol the pipeline system, if no immediate reason can be determined for the change in system operating parameters; • Monitor situation closely for a continued deviation from the normal;

ABNORMAL OPERATIONS THAT POSE A THREAT FOR A WORST CASE DISCHARGE CONTINUED (AS GIVEN IN THE O & M MANUAL)	
OPERATION	**PROCEDURES TO MITIGATE OR ELIMINATE THREAT**
	• Proceed with the shutdown in a safe, orderly manner if adjustments cannot be made to restore the flow or pressure to original conditions and a shutdown is required; • Maintain documentation in a suitable format.
Loss of Communications	• Inspect the telemetry device sensing the loss of communication; • If a problem is found at that device, initiate immediate repair procedures; • If no problem is found at the device, reset device and check receiving end; • If a problem is found at the receiving end, initiate immediate repair procedures; • Notify the appropriate personnel to exchange necessary information regarding flow changes, pressures, etc. to other parties on the pipeline system as required; • Notify Operations when the condition has been remedied; • If the problem is with the phone system, initiate a repair request with the local telephone company and switch to the alternate methods of communication described in this plan.
Operation of Any Safety Device	• Inspect the device to attempt to determine the cause of the device's abnormal operation; • Adjust, if possible, the operation to cause the device to return to its original setting or position; • Proceed with shutdown procedures in a safe, orderly manner if adjustments cannot restore the device to its original condition and a shutdown is required; • Notify operations management; • Notify other customers and/or suppliers connected to the pipeline system; and • Suitably document the event.
Malfunction, Deviation, or Error Causing Hazard	• Take appropriate steps to correct the problem; • Notify operations and management; • Notify customers; • Document the event.

II. In the event of an incident, the following procedures will be followed by the personnel on-scene to mitigate or prevent any discharge from the pipeline (please see each response zone appendix for additional procedures relevant to each response zone):

Priority #	Procedure
I.	The employee discovering the incident will immediately notify the Q.I. or his designee as well as his pipeline supervisor.
II.	The pipeline supervisor or his designee will make an immediate assessment of the incident as observed or reported, and, in accordance with that assessment, will: A. Evacuate the immediate area and the area downwind of the spill; B. Eliminate sources of ignition; C. Keep all persons out of the danger area; D. Make additional notification to the appropriate Qualified Individual to begin all notifications. E. Take steps to secure the source of the spill if plausible and safe to do so; F. Direct initial containment procedures if feasible.
III.	The Qualified Individual will then mobilize additional resources from the contracted Oil Spill Removal Organization if the situation warrants assistance.
IV.	The pipeline supervisor or his designee shall take any steps feasible in order to minimize any threat to the public health and safety and to reduce the severity of the incident. • Until confirmed otherwise, the spill environment must be presumed to be hazardous. That presumption remains until the characteristics of the spilled material have been determined and the area has been properly tested. • Proper personnel protective equipment shall be utilized prior to entering a spill site. • If the spill observer does not have data and equipment to make that determination, an immediate request for this specific need should be made.
V.	The pipeline supervisor or his designee shall function as the responsible Discovery Producer Services person-in-charge until relieved by a Qualified Individual who will assume the position as On-Scene Coordinator and take over the spill response effort.

III. In the event of an incident, the following equipment may be needed in response activities on land and navigable waters (please see each response zone appendix for a list of specific equipment and facilities within each zone):

Possible Types Of Equipment Needed In Response Activities	
1.	Transfer hoses and connection equipment
2.	Portable pumps and ancillary equipment
3.	Facilities available to transport and receive oil from a leaking pipeline (please see response zone appendices)
4.	Oil Spill Removal Organization- ES&H, Inc. spill control and recovery equipment

IV. In the event of an incident, equipment for response activities is available on a 24-hour basis at the following locations:

Company Name	Location	24-hour Contact Information
ES&H The Total Assurance Team	Gulf Coast 1730 Coteau Rd. Houma, LA 70364	877-437-2634
Clean Gulf Associates	650 Poydras Street, Suite 1020 New Orleans, LA 70130	888-242-2007
AMPOL	Gulf Coast 401 West Admiral Doyle New Iberia, LA 70560	337-365-7847
Discovery Producer Services does not maintain any emergency response equipment; therefore, no discussion of company owned resources is present in this plan.		

- Please see the list of equipment available for use during an incident.

V. In the event of an incident, personnel from the contracted Oil Spill Response Organizations will be responsible for the use of any response equipment mentioned in this response manual. Please see the following pages for a list of this equipment and its locations.

ES&H
The Total Assurance Team

Bossier City Response Office
101 Crown Court Place
Bossier City, LA 71112

Belle Chasse Response Office
2305 N. Concord Road
Belle Chasse, LA 70037

Dallas/Fort Worth Response Office
3418 Gilbert Road
Grand Prairie, TX 75050

Fourchon Response Office
106 17th Street
Fourchon, LA 70357

Golden Meadow Response Office
21148 Hwy 1
Golden Meadow, LA 70357

Houma Response Office
1730 Coteau Road
Houma, LA 70364

Houston Response Office
202 Preston Avenue
Pasadena, TX 77503

Lake Charles Response Office
4141 S. Beglis Parkway
Sulphur, LA 70663

Mobile Response Office
5400 A Willis Rd.
Theodore, AL 36582

Morgan City Response Office
3189 Highway 70
Morgan City, LA 70380

New Iberia Response Office
2917 Fairchild Drive
New Iberia, LA 70562

Consulting & Training Group
1730 Coteau Road
Houma, LA 70364

Consulting & Training Group
2345 Atascocita Road
Humble, TX 77346

Industrial Group
1085 Bert St.
LaPlace, LA 70068

June 16, 2014

Discovery Producer Services
Larose Gas Plant
Mr. Dale Fincher
1474 Highway 24
Larose, LA 70373

RE: Letter of Intent for Emergency Response Services & Resources

Dear Mr. Dale Fincher:

Environmental Safety and Health Consulting Services, Inc. (ES&H) is pleased to offer our emergency response services and resources to Discovery Producer Services. In the event of an environmental emergency at Larose Gas Plant, ES&H shall immediately respond with the appropriate resources twenty-four (24) hours per day, seven (7) days per week.

If for any reason ES&H resources are not immediately available, ES&H will subcontract the necessary resources and/or assign the work to be performed. All of our response facilities are staffed with 40-hour Hazwoper trained personnel that are experienced and knowledgeable in emergency response operations. All of our response equipment is properly maintained and deployed annually in accordance with the USCG PREP and OPA 90 guidelines. As per 33 CFR 154.1045 paragraph (c)(1) and (c)(2), all requirements regarding response times resources shall be met for Worst Case Discharge (WCD) events.

This Letter of Intent (LOI) shall confirm our intention to respond to all environmental emergencies with all of the necessary resources. Should you have any questions or comments regarding these provisions please feel free to contact me at (985) 851-5350 or by e-mail at klormand@esandh.com.

Certifying Official

Kevin J. Lormand
Vice President
Emergency Response / OSRO Services

ES&H
The Total Assurance Team

Bossier City Response Office
101 Crown Court Place
Bossier City, LA 71112

Belle Chasse Response Office
2305 N. Concord Road
Belle Chasse, LA 70037

Dallas/Fort Worth Response Office
3418 Gilbert Road
Grand Prairie, TX 75050

Fourchon Response Office
106 17th Street
Fourchon, LA 70357

Golden Meadow Response Office
21148 Hwy 1
Golden Meadow, LA 70357

Houma Response Office
1730 Coteau Road
Houma, LA 70364

Houston Response Office
202 Preston Avenue
Pasadena, TX 77503

Lake Charles Response Office
4141 S. Beglis Parkway
Sulphur, LA 70663

Mobile Response Office
5400 A Willis Rd.
Theodore, AL 36582

Morgan City Response Office
3189 Highway 70
Morgan City, LA 70380

New Iberia Response Office
2917 Fairchild Drive
New Iberia, LA 70562

Consulting & Training Group
1730 Coteau Road
Houma, LA 70364

Consulting & Training Group
2345 Atascocita Road
Humble, TX 77346

Industrial Group
1085 Bert St.
LaPlace, LA 70068

January 13, 2014

Discovery Producer Services
Larose Gas Plant
Mr. Dale Fincher
1474 Highway 24
Larose, LA 70373

Reference: **Unannounced** OSRO Equipment Deployment PREP Certification for 2013

Dear Mr. Dale Fincher,

In accordance with 33 CFR 154.1055(a)(3) and the National Preparedness for Response Exercise Program (PREP), Environmental Safety and Health Consulting Services, Inc. (ES&H) hereby certifies that our response equipment was deployed and operated by ES&H personnel on the following dates and locations for 2013:

Date	Company Name	Location	Parish/County
1/13/2013	TPIC	Lake Hatch, LA	Terrebonne Parish
1/27/2013	Nature's Way	Vicksburg, MS	Warren County
2/13/2013	Stone Energy	Cocodrie, LA	Terrebonne Parish
3/12/2013	Settoon Towing	Empire, LA	Plaquemines Parish
3/30/2013	Shell Pipeline	Pasadena, TX	Harris County
4/17/2013	Settoon Towing	Lafitte, LA	Jefferson Parish
6/28/2013	USCG	Mobile, AL	Mobile County
9/26/2013	Linc Energy	Leeville, LA	Lafourche Parish
10/31/2013	Breaux Petroleum	Cocodrie, LA	Terrebonne Parish
11/6/2013	TPIC	Hackberry, LA	Cameron Parish
11/11/2013	Linc Energy	Hackberry, LA	Cameron Parish
12/11/2013	USCG	Mobile, AL	Mobile County

Objectives met: ES&H demonstrated the effective ability to deploy and operate its equipment. In every deployment, a minimum of 1,000 feet of containment boom and one skimmer were deployed.

All ES&H personnel that took part in each equipment deployment received the necessary training to safely and effectively respond to an oil spill. A record of this training is on file and available upon request.

In accordance with federal law, please retain this document for at least three years.

Certifying Official

Kevin J. Lormand

Kevin J. Lormand
Vice President, Eastern Region
Emergency Response / OSRO Services

ES&H
The Total Assurance Team

Bossier City Response Office
101 Crown Court Place
Bossier City, LA 71112

Belle Chasse Response Office
2305 N. Concord Road
Belle Chasse, LA 70037

Dallas/Fort Worth Response Office
3418 Gilbert Road
Grand Prairie, TX 75050

Fourchon Response Office
106 17th Street
Fourchon, LA 70357

Golden Meadow Response Office
21148 Hwy 1
Golden Meadow, LA 70357

Houma Response Office
1730 Coteau Road
Houma, LA 70364

Houston Response Office
202 Preston Avenue
Pasadena, TX 77503

Lake Charles Response Office
4141 S. Beglis Parkway
Sulphur, LA 70663

Mobile Response Office
5400 A Willis Rd.
Theodore, AL 36582

Morgan City Response Office
3189 Highway 70
Morgan City, LA 70380

New Iberia Response Office
2917 Fairchild Drive
New Iberia, LA 70562

Consulting & Training Group
1730 Coteau Road
Houma, LA 70364

Consulting & Training Group
2345 Atascocita Road
Humble, TX 77346

Industrial Group
1085 Bert St.
LaPlace, LA 70068

February 4, 2013

Discovery Producer Services
Larose Gas Plant
Mr. Dale Fincher
1474 Highway 24
Larose, LA 70373

Reference: **Unannounced** OSRO Equipment Deployment PREP Certification for 2012

Dear Mr. Dale Fincher,

In accordance with 33 CFR 154.1055(a)(3) and the National Preparedness for Response Exercise Program (PREP), Environmental Safety and Health Consulting Services, Inc. (ES&H) hereby certifies that our response equipment was deployed and operated by ES&H personnel on the following dates and locations for 2012:

Date	Company Name	Location	Parish/County
1/23/2012	Austin Energy	Sector Galveston/Houston	Travis County
2/17/2012	Settoon Towing	Sector New Orleans	St. John the Baptist Parish
5/15/2012	ES&H Consulting Services	Sector Corpus Christi	Nueces County
8/21/2012	ES&H Consulting Services	Sector Mobile	Mobile County
9/17/2012	Weston Solutions	Sector Galveston/Houston	Tarrant County
10/1/2012	Motiva Enterprises	Sector New Orleans	St. John the Baptist Parish
10/17/2012	ES&H Consulting Services	Sector Corpus Christi	Nueces County
12/31/2012	ES&H Consulting Services	Sector Mobile	Mobile County

Objectives met: ES&H demonstrated the effective ability to deploy and operate its equipment. In every deployment, a minimum of 1,000 feet of containment boom and one skimmer were deployed.

All ES&H personnel that took part in each equipment deployment received the necessary training to safely and effectively respond to an oil spill. A record of this training is on file and available upon request.

In accordance with federal law, please retain this document for at least three years.

Certifying Official

Kevin J. Lormand
Vice President, Eastern Region
Emergency Response / OSRO Services

ES&H
The Total Assurance Team

Bossier City Response Office
101 Crown Court Place
Bossier City, LA 71112

Belle Chasse Response Office
2305 N. Concord Road
Belle Chasse, LA 70037

Dallas/Fort Worth Response Office
3418 Gilbert Road
Grand Prairie, TX 75050

Fourchon Response Office
106 17th Street
Fourchon, LA 70357

Golden Meadow Response Office
21148 Hwy 1
Golden Meadow, LA 70357

Houma Response Office
1730 Coteau Road
Houma, LA 70364

Houston Response Office
202 Preston Avenue
Pasadena, TX 77503

Lake Charles Response Office
4141 S. Beglis Parkway
Sulphur, LA 70663

Mobile Response Office
5400 A Willis Rd.
Theodore, AL 36582

Morgan City Response Office
3189 Highway 70
Morgan City, LA 70380

New Iberia Response Office
2917 Fairchild Drive
New Iberia, LA 70562

Consulting & Training Group
1730 Coteau Road
Houma, LA 70364

Consulting & Training Group
2345 Atascocita Road
Humble, TX 77346

Industrial Group
1085 Bert St.
LaPlace, LA 70068

June 12, 2012

Discovery Producer Services
Larose Gas Plant
Mr. Dale Fincher
1474 Highway 24
Larose, LA 70373

Reference: **Unannounced** OSRO Equipment Deployment PREP Certification for 2009

Dear Mr. Dale Fincher:

In accordance with 33 CFR 154.1055(a)(3) and the National Preparedness for Response Exercise Program (PREP), Environmental Safety and Health Consulting Services, Inc. (ES&H) hereby certifies that our response equipment was deployed and operated by ES&H personnel on the following dates and locations for 2011:

Date	Company Name	Location	Parish/County	Job Number
1/27/2011	Chevron Venice	Sector New Orleans	Plaquemines Parish	01-124-11-09
2/14/2011	Maritech	Sector New Orleans	Lafourche Parish	02-092-11-09
3/24/2011	USCG	Sector New Orleans	Lafourche Parish	03-137-11-05
3/24/2011	Anglo Suissie	Sector New Orleans	Lafourche Parish	03-165-11-05
6/9/2011	USCG	Sector New Orleans	Plaquemines Parish	06-053-11-09
6/26/2011	Swift Energy	Sector New Orleans	Plaquemines Parish	06-170-11-09
7/9/2011	Sunland Construction	Sector Mobile	Harrison County	06-153-11-07
8/4/2011	Gulf Coast Asphalt Company	Sector Mobile	Mobile County	09-035-11-07
9/4/2011	Moncla Wells	Sector New Orleans	St. Mary Parish	09-033-11-04
12/22/2011	Environmental Consulting Services, Inc.	Sector Corpus Christi	Nueces County	12-001A-11-06
12/30 /2011	Environmental Consulting Services, Inc.	Sector Houston/Galveston	Harris County	12-001B-11-06

Objectives met: ES&H demonstrated the effective ability to deploy and operate its equipment. In every deployment, a minimum of 1,000 feet of containment boom and one skimmer were deployed.

All ES&H personnel that took part in each equipment deployment received the necessary training to safely and effectively respond to an oil spill. A record of this training is on file and available upon request.

In accordance with federal law, please retain this document for at least three years.

Certifying Official

Kevin J. Lormand

Kevin J. Lormand
Vice President, Eastern Region
Emergency Response / OSRO Services

RESPONSE RESOURCES
LOCATION GUIDE

24-HOUR EMERGENCY HOTLINE
1-877-4ESANDH

JULY 2012

HOUMA*FOURCHON*GOLDEN MEADOW*MORGAN CITY
BELLE CHASSE*LAPLACE*MOBILE*LAFAYETTE
LAKE CHARLES*BOSSIER CITY*HOUSTON*DALLAS-FT. WORTH

Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
1	6" CONTAINMENT BOOM	300'			200'			200'		200'			
2	10" CONTAINMENT BOOM	1,000'		500'	1,000'	1,000'		1,500'	500'		2,000'		2,000'
3	18" CONTAINMENT BOOM	32,000'	1,000'	10,000'	1,000'	16,000'	6,000'	6,000'	13,000'	42,000'	1,500	30,000'	5,300'
4	24" CONTAINMENT BOOM	300'				500'							
5	OIL SPILL RESPONSE TRAILER	3	1	1	1	3	1	1	1	2	1	1	2
6	16' CONTAINMENT BOOM TLR.	5	1	1	2	2	1	1	1		1	1	1
7	24' CONTAINMENT BOOM TLR.									2	1	1	1
8	30' CONTAINMENT BOOM TLR.					1							
9	HAZ-MAT RESPONSE TRAILER						1		1	1	1	1	1
10	INDUSTRIAL SERVICES TRAILER				1	1	3		1			1	1
11	INDUSTRIAL CLEANING TLR.	4	1	1		1	2		1		2	1	1
12	COMMUNICATIONS TRAILER	1											
13	MOBILE COMMAND POST TLR.	2				1	1			1			
14	35' PPE/Consumables TLR.									1			
15	48' CONTAINMENT BOOM TLR.	5		2		2	1	1	2	6	1	4	1
16	48' PPE TRAILER	1		1			2	1		1			1
17	48' DECON TRAILER	1											
18	48' CONSUMABLES TRAILER	7		1			1						
19	48' ABSORBENT MATERIALS TLR.	5		1		1	7	1	1	2	1		
20	48' FLATBED TRAILER	2											
21	RESPONSE VEHICLES (P/U TRUCKS)	17		3	3	7	20	3	4	6	5	6	12
22	TRACTOR TRUCK	10				3	10			1	1	3	3
23	70/80 BBL VACUUM TRUCK	4		1		1	3	1		1	1	2	2
24	130 BBL VACUUM TRAILER	8		1		3				1	1	2	1
25	S/S CHEMICAL TRANSPORT TLR.												1
26	FLATBED DRUM TRUCK	1					2			1			
27	BOBTAIL ROLL-OFF TRUCK	2					5			1	1		1
28	SINGLE RAIL ROLL OFF BOX TLR.	1					1				1	1	2
29	DOUBLE RAIL ROLL OFF BOX TLR.	2				1	9						
30													

Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
31	LORI BRUSH SKIMMER			2									
32	JBF SKIMMER									1			
33	MARCO SKIMMER	2				1				1		1	
34	SIDEWINDER BELT SKIMMER									2			
35	GOO GOBBLER SKIMMER	1		1			1	1					
36	MOBILE DRUM SKIMMER BARGE	2											
37	SMALL DRUM SKIMMER				1								1
38	MEDIUM DRUM SKIMMER	7	1	3	2	2	2	1	3	6		2	2
39	LARGE DRUM SKIMMER	5		1	1	1	1	1	2	2	2	1	1
40	SMALL SKIM-PAK SKIMMER	4							2	1			
41	MEDIUM SKIM-PAK SKIMMER	2				1							
42	LARGE SKIM-PAK SKIMMER	9		2	1	3	2	2	2	3	1	2	2
43	MANTA RAY SKIMMER					1							
44	ROPE MOP SKIMMER	2											
45	30 BBL OIL STORAGE BARGE	2											
46	225 BBL OIL STORAGE BARGE	2											
47	12' - 14' RESPONSE BOAT	36	2	2	3	4		2	3	3	1		1
48	16' RESPONSE BOAT				1	1			1			4	
49	18' - 21' RESPONSE BOAT	2	1	1	1	1			1	1			
50	22' - 25' RESPONSE BOAT	5			1	1		1	1	1	1		
51	26' - 29' RESPONSE BOAT	5		1	1	2		1	1	2		3	1
52	30' - 33' RESPONSE BOAT												
53	34' - 37' RESPONSE BOAT												
54	38' - 40' RESPONSE BOAT												
55	22' - 25' BARGE BOAT									1			
56	26' - 30' BARGE BOAT	2								1			
57	31' - 35' BARGE BOAT												
58	36' - 39' BARGE BOAT												
59	40' - 45' BARGE BOAT	2	1	2									

Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
60	PERSONNEL VAN	3											
61	30 PASSENGER BUS	1											
62	4 x 4 ATV	2							1	2			
63	UTV/RTV	2		2			1			2	1		2
64	25 - 40 HP TRACTOR	1							1				
65	TRITON VACUUM UNIT						4						1
66	PORTABLE MINI-VAC	2		1						1			
67	DRUM HEAD VACUUM UNIT										3	2	4
68	MERCURY VACUUM UNIT						3				1	1	1
69	25 CU. YD. VACUUM BOX	2					4				1		3
70	20 - 25 CU. YD. ROLL OFF BOX	45					5			5	12		20
71	250 BBL FRAC TANK												1
72	1" DIAPHRAGM PUMP	1			1	2	3		1	2	2	1	3
73	1" CHEMICAL TRANSFER PUMP					1	1		1	1	2	1	3
74	2" DIAPHRAGM PUMP	24	2	4	6	2	10	3	5	5	3	4	5
75	2" CHEMICAL TRANSFER PUMP					1	2		1	2	1	1	1
76	3" DIAPHRAGM PUMP	9				1	11					8	2
77	2" CENTRIFUGAL PUMP	50	2	6	5	6	6	3	10	12	2	3	2
78	3" CENTRIFUGAL PUMP						3			1			
79	5 kW GENERATOR	12	1	2	3	7	1	1	3	4	2	3	6
80	15 kW GENERATOR	1											
81	10 CFM AIR COMPRESSOR	20	1	4	4	7	2	2	4	8	2	3	4
82	185 CFM AIR COMPRESSOR	1							1		2	1	3
83	375 CFM AIR COMPRESSOR						3						1
84	1500 PSI PRESSURE WASHER	6	1	1	1		1	1	1	2			
85	3000 PSI PRESSURE WASHER				1	2	3	1	2			1	
86	4000 PSI STEAM CLEANER	4		1			1		1	1	1	1	1
87	BOBCAT SKID STEER LOADER										1		1
88	LIGHT TOWER	4	2	2			6			2	2	2	2
89													

Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
90	4 GAS AIR MONITORING INSTR.	7		2	2	2	9	1	2	3	2	1	2
91	CMS AIR MONITORING INSTR.	2		1	1	2	1	1	1	2	1		
92	PID/FID	1										1	
93	4 GAS PID + VOC					1					1		2
94	CHEMICAL SPECIFIC PID										1		1
95	NORM SURVEY INSTRUMENT	2			2	2			2	2	2		2
96	SCBA						4		4	4	4	4	4
97	SCBA SPARE BOTTLES						4		4	4	8	8	8
98	TRIPOD/WINCH RETRIEVAL SYSTEM					1					1	3	1
99	COPPUS BLOWERS	1				1	6		2	2	2	4	2
100	SATELLITE PHONE	6			1	2			1	1			
101													
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Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
120	OIL ABSORBENT PADS	750	50	100	125	200	500	300	250	500	200	200	200
121	5" OIL ABSORBENT BOOM	1,000	25	150	100	100	1150	300	150	850	50	50	50
122	8" OIL ABSORBENT BOOM	200		10	25	150			25		25	25	25
123	UNIVERSAL ABSORBENT PADS	75	10	15	15				40	15	20	20	20
124	UNIVERSAL ABSORBENT BOOM	30	5	5	10				10	10	10	10	10
125	CHEMICAL ABSORBENT PADS	12	10	25	5	50	15		12	25	30	30	50
126	CHEMICAL ABSORBENT BOOM	25	5	10	5	50	10		6	12	10	10	10
127	OIL ABSORBENT ROLL	750	15	25	12	40	730	10	15	25	10	10	10
128	OIL ABSORBENT SWEEP	100		15	6				10	10	0	0	0
129	INDUSTRIAL CARPET	200	10	15	6	25	1170	25	25	50	10	10	10
130	POM-POM SNARE	150		25	10				25	25			
131	50' SNARE ON A ROPE	200		50	12	50			12	25			
132	100' SNARE ON A ROPE	300		50	6		580		6	30			
133	OIL GATOR	100	25	50	12	25	24	25	25	50	25	25	25
134	55 gal. PLASTIC DRUM	250	12	25	50	20	16	15	35	75	20	20	40
135	55 gal. STEEL DRUM	12	6	12	6		12		10	10	40	25	40
136	95 gal. PLASTIC SALVAGE DRUM	50	3	6	6	10	4	5	12	12	15	5	15
137	POLLUTION BAGS	320	10	25	25	150	32	100	50	150	50	50	50
138	POLY SHEETING	100	6	25	10	100	4	10	15	50	25	25	25
139	ROLL OFF BOX LINERS	100	6	12	10	50	100	15	15	25	100	100	100
140													
141													
142													
143													
144													
145													
146													
147													
148													
149													

Specific Information on Resources

Items 1 – 4: **Total** amount of containment boom stored at each ES&H office location.

Item 5: **Oil Spill Response Trailer** – contains up to 500' of containment boom, 1 drum skimmer package, 3 wash pump packages, PPE and various absorbent products. Designed to accommodate a 4 man crew working for 1 to 2 days on Average Most Probable Discharge (AMPD).

Item 6: **16' Containment Boom Trailer** – contains 1000' of 18" containment boom, anchors, anchor buoys and rope.

Item 7: **24' Containment Boom Trailer** – contains 2000' of 18" containment boom, anchors, anchor buoys and rope.

Item 8: **30' Containment Boom Trailer** – contains 3000' of 18" containment boom, anchors, anchor buoys and rope.

Item 9: **Haz-Mat Response Trailer** – contains specialized tools and equipment to respond to hazardous materials incidents; also contains chemical absorbent products and high level PPE. Designed to accommodate a 4 man crew responding to any hazardous materials incident.

Item 10: **Industrial Services Trailer** – contains specialized tools and equipment for industrial cleaning services, including confined space entry safety equipment and PPE.

Item 11: **Industrial Cleaning Trailer** – contains 350 gallon water storage tank and 4,000 psi hot water pressure washer. Self contained unit to perform industrial cleaning services.

Item 12: **Communications Trailer** – enclosed trailer with air conditioning; contains cellular and satellite communications and IT support. Self contained unit with generator and shore power capabilities.

Item 13: **Mobile Command Post Trailer** – enclosed trailer with air conditioning; contains work space for personnel on emergency response projects. Self contained unit with generator and shore power capabilities.

Item 14: **35' PPE/Consumables Trailer** – enclosed trailer containing significant quantities of PPE and consumable items.

Item 15: **48' Containment Boom Trailer** – 48' box trailer containing 6,000' of 18" containment boom, anchors, anchor buoys, and rope.

Item 16: **48' PPE Trailer** – 48' box trailer containing significant quantities of PPE (i.e., protective coveralls, inner and outer protective gloves, hard hats, safety glasses, etc.).

Item 17: **48' Decon Trailer** – 48' box trailer containing equipment decontamination supplies and equipment (i.e., decon pools, degreaser soap, hand tools, sorbent materials, etc.)

Item 18: **48' Consumables Trailer** – 48' box trailer containing variety of consumable items (i.e., pollution bags, poly sheeting, rope, degreaser soap, industrial carpet, etc.)

Item 19: **48' Absorbent Materials Trailer** – 48' box trailer containing oil absorbent materials (i.e., absorbent pads, 5" absorbent boom, etc.)

Item 31: **LORI Brush Skimmer** – 56’ OSRV with shallow draft capabilities. 2 side mounted LORI Brush Skimmers with 45’ skimming width. Capable of recovering spilled oil at rates up to 15 gpm. Storage capacity of 90 bbls.

Item 32: **JBF Skimmer** – 38’ OSRV DIP 3003 with Filterbelt skimming module capable of recovering spilled oil at rates up to 400 gpm. Storage capacity of 95 bbls.

Item 33: **Marco Skimmer** - Harbor Class OSRV (30’) with shallow draft capabilities. One foot (1’) wide Filterbelt skimming module capable of recovering spilled oil at rates up to 427 bbls per day. Storage capacity of 25 bbls.

Item 34: **Sidewinder Belt Skimmer** – Sorbent Lifting Belt Skimmer. Designed to be installed on any suitable vessel as an over-the-side skimmer for stationary and advancing applications. Capable of recovering spilled oil at rates of up to 773 bbls per day.

Item 35: **Goo Gobbler Skimmer** – Harbor Class OSRV (32’) with shallow draft capabilities. 30” aluminum cylinder skimmer capable of recovering spilled oil at rates up to 770 bbls per day.

Item 36: **Mobile Drum Skimmer Barge** – 8’ X 16’ shallow draft aluminum storage barge (25 bbl storage capacity) with Drum Skimmer Package.

Item 37: **Small Drum Skimmer** – Elastec MiniMax industrial skimmer. Recovery rate of up to 20 gpm.

Item 38: **Medium Drum Skimmer** – Elastec TDS 118 skimmer. Recovery rate of up to 35 gpm.

Item 39: **Large Drum Skimmer** – Elastec TDS 136 skimmer. Recovery rate of up to 70 gpm.

Item 40: **Small Skim Pak Skimmer** – Skim Pak Model 2300-SH floating suction skimmer. Self –adjusting weir with recovery rate of up to 58 gpm.

Item 41: **Medium Skim Pak Skimmer** – Skim Pak Model 4300-SH floating suction skimmer. Self-adjusting weir with recovery rate of up to 95 gpm.

Item 42: **Large Skim Pak Skimmer** – Skim Pak Model 18300-SH floating suction skimmer. Self-adjusting weir with recovery rate of up to 420 gpm.

Item 43: **Manta Ray Skimmer** – Rigid Manta Ray floating suction skimmer. Recovery rate of up to 150 gpm.

Item 44: **Rope Mop Skimmer** – 4” X 50’ Rope Mop (single roller). Recovery rate of up to 35 bbls per day.

Item 45: **30 bbl Oil Storage Barge** – 8’ X 16’ aluminum oil storage barge. 25 bbl storage capacity.

Item 46: **225 bbl Oil Storage Barges** – 8’ X 40’ aluminum oil storage barges (2 barges per set). Each set has 225 bbl storage capacity.

Item 65: **Triton Vacuum Unit** – 2500 Series (2500 cfm) Liquid Ring Vacuum Pump. Product intake through 6” inlet. Can load into collection tank or vacuum box, or alternatively into drums, supersacks, or open top boxes.

Item 66: **Portable Mini-Vac** – Mobile, portable vacuum system designed for spill recovery. Capable of recovering a wide range of liquids, oils and sludges with solids up to 2” diameter. Recovered material deposited into 500 gallon built-in storage tank.

Item 67: **Drum Head Vacuum Unit -** Mobile, portable vacuum system designed for spill recovery. Capable of recovering a wide range of liquids, oils and sludges with solids up to 2" diameter. Recovered material deposited into common open top drums.

Item 90: **4 Gas Air Monitoring Instrument -** Multi-gas detector used to monitor Oxygen, Lower Explosive Limit, Carbon Monoxide and Hydrogen Sulfide.

Item 91: **CMS Air Monitoring Instrument** – The Chip Measuring System (CMS) instrument provides a quantitative determination of hazardous gas or vapor concentrations in the air. Each chip is substance – specific and has 10 possible measurements per chip.

Item 92: **PID / FID** – Photoionization or Flame Ionization Detectors; used to measure volatile organic compounds and other gases in concentrations from sub parts per billion to 10,000 parts per million.

Item 93: **4 Gas PID + VOC** – 4 Gas Air Monitoring Instrument with Volatile Organic Compound measuring capabilities.

Item 94: **Chemical Specific PID** – Photoionization detector with specific chemical vapor or gas measuring ability.

Item 95: **NORM Survey Instrument** – Ludlum NORM Surveying Instrument calibrated to detect Radium 226.

CLEAN GULF  ASSOCIATES

SUBSIDIARY INFORMATION	
Company Name:	Williams Partners Operating, LLC
Primary Point of Contact Information	
Name:	Bola Adeshina
E-Mail Address:	Bola.Adeshina@williams.com
Office Phone:	(713) 215-3044
Alternate Point of Contact Information	
Name:	Rafael Castillo
E-Mail Address:	rafael.castillo@williams.com
Office Phone:	713-215-2641
COMPANY LIST	
Company Names: (List only wholly owned subsidiaries or companies that are being covered under the CGA Membership)	Williams Field Services Group, LLC
	Discovery Producer Services LLC
	Discovery Gas Transmission LLC
	Gulfstream Natural Gas System, LLC
	Transcontinental Gas Pipe Line Company, LLC
	Williams Field Services - Gulf Coast Company, LP
	Black Marlin Pipeline LLC; Williams Oil Gathering, LLC
	Williams Mobile Bay Producer Services, LLC
POC Signature:	
Date:	04/17/14

PLEASE RETURN TO:

Email: richj@cleangulfassoc.com
Jessica Rich
Clean Gulf Associates
650 Poydras Street. Suite 1020
New Orleans, Louisiana 70130
Phone: (504) 799-3033 Fax: (504) 799-3036

Clean Gulf Associates
"BY INDUSTRY, FOR INDUSTRY"

CLEAN GULF ASSOCIATES
Post Office Box 51239 New Orleans, Louisiana 70151

Please be advised Williams Partners Operating, LLC currently has a membership agreement with Clean Gulf Associates (CGA) as equipment provider and the following contracts or agreements by way of CGA membership:

Membership Agreement	CGA	February 5, 2013
Dispersant Air	ASI	February 5, 2013
Surge Capability	T&T	January 15, 2013
Response Personnel	CGAS	January 15, 2013

The subject contracts or membership agreements provide immediate access to available personnel and/or equipment 24-hour per day basis.

Signed: Jessica Rich
Title: Administrative Assistant
Dated: 2/6/13

Poydras Center • 650 Poydras Street • Suite 1020 • New Orleans, Louisiana 70130
P. O. Box 51239 • New Orleans, LA 70151
Phone (504)799-3035 • Fax (504) 799-3036

AMPOL

AMERICAN POLLUTION CONTROL, CORP.

6-16-14

Discovery Producer Services
Attention: Dale Fincher
P.O. Box 1699
Larose, LA. 70373

RE: Letter of Intent – Response Zone 2 – NGL Onshore Oil Pipeline located in Lafourche and St. Charles Parish.

Dear Sir/Madam,

Thank you for the opportunity to be of service to Discovery Producer Services. AMPOL can provide emergency response services to your facilities on a 24 hour basis. All of our response resources are listed within our United Stated Coast Guard (USCG) Oil Spill Removal Organization (OSRO) Classification. Our resources are maintained and exercised annually in accordance with the USCG PREP and OPA 90 readiness guidelines.

AMPOL is listed as an MM through W3 contractor with the USCG. Per 33CFR 154.1045 paragraph (c) (1) and (c) (2), all time and equipment requirements will be met for the worst case discharge. AMPOL is also listed as a group 5 OSRO with the USCG. All of AMPOL's response resources, maintenance and training records are available for inspection by Customer upon request. AMPOL will provide response services to Customer on an immediate basis. In the event AMPOL is unable to provide immediate response services for any reason whatsoever, AMPOL will make its best efforts to subcontract and/or assign the work to be performed hereunder. Response times will vary due to facility/vessel location.

This Letter of Intent (LOI) and support agreement documents will cover at a minimum a three-year period, starting in June 2014 through June 2017.

This Letter will provide proof of our intention to respond with all available resources, and participation in any drills or exercises that involve Ampol assets, persons, or resources. A Master Service Agreement or AMPOL's Services Contract with signatures by both the Customer and AMPOL must accompany this LOI as required by the USCG under CFR 33 **154.1028** (1).

24-Hour Emergency Response Hotline
1-800-482-6765

Again, thank you for the opportunity to be of service to Discovery Producer Services. If we can be of further assistance, please feel free to call at any time.

Sincerely,

Kirk Headley
AMPOL

401 W. Admiral Doyle Drive • New Iberia, LA 70560
(337) 365-7847 • Fax (337) 365-8890 • 1-800-482-6765

RESPONSE ACTIVITIES

I. In the event of an incident, the operating personnel will be responsible for the following actions pending the arrival of the qualified individual:

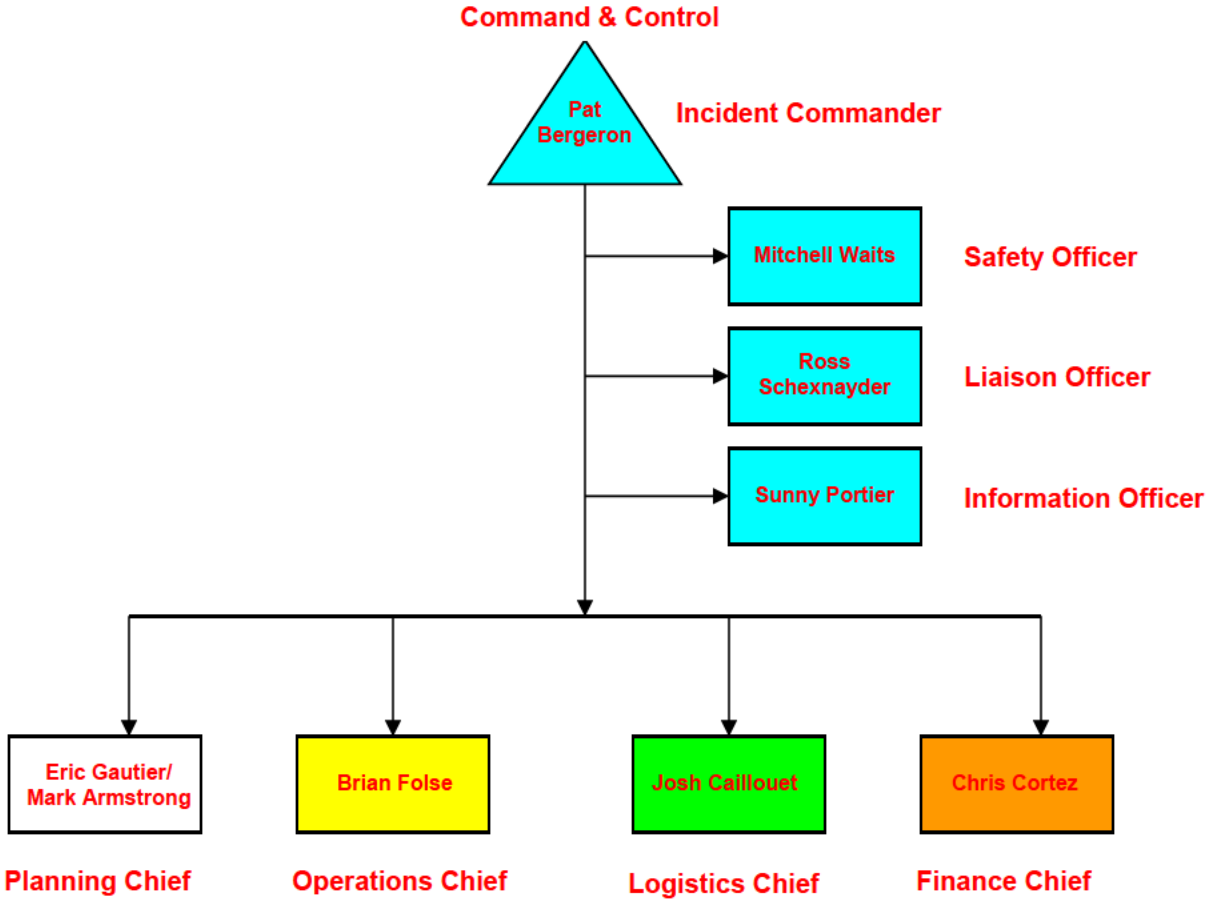
Priority #	Procedure
I.	The employee discovering the incident will immediately notify the Q.I. or his designee as well as his pipeline supervisor.
II.	The pipeline supervisor or his designee will make an immediate assessment of the incident as observed or reported, and, in accordance with that assessment, will: A. Evacuate the immediate area and the area downwind of the spill; B. Eliminate sources of ignition; C. Keep all persons out of the danger area; D. Make additional notification to the appropriate Qualified Individual to begin all notifications. E. Take steps to secure the source of the spill if plausible and safe to do so; F. Direct initial containment procedures if feasible.
III.	The Qualified Individual will then mobilize additional resources from the contracted Oil Spill Removal Organization if the situation warrants assistance.
IV.	The pipeline supervisor or his designee shall take any steps feasible in order to minimize any threat to the public health and safety and to reduce the severity of the incident. • Until confirmed otherwise, the spill environment must be presumed to be hazardous. That presumption remains until the characteristics of the spilled material have been determined and the area has been properly tested. • Proper personnel protective equipment shall be utilized prior to entering a spill site. • If the spill observer does not have data and equipment to make that determination, an immediate request for this specific need should be made.
V.	The pipeline supervisor or his designee shall function as the responsible Discovery Producer Services person-in-charge until relieved by a Qualified Individual who will assume the position as On-Scene Coordinator and take over the spill response effort.

II. **In the event of an incident, the Qualified Individual shall be responsible for all of the duties listed below:**

Responsibilities of the Qualified Individual	
PRIORITY	ACTION
1.	If appropriate, verify the sounding of the internal alarms system and the notification of the occupants of the facility hazard
2.	Notify local facility and OSRO response personnel, as needed. **The Q.I. Specifically has the authority to contract these resources/OSRO.**
3.	Identify or verify the character, exact source, amount and extent of the release, along with other items needed for internal and external notifications as specified in this response plan
4.	Notify and provide information verbally to the appropriate Federal, State and Local authorities as described in the notifications tables in this response plan **as well as act as an On-going Liaison with these agencies.**
5.	Assess the possible hazards to human health and the environment due to the release
6.	Assess and implement proper removal actions to contain and remove the substance released
7.	Coordinate rescue and response actions as previously arranged with all response personnel
8.	Use authority to immediately access company funding to initiate clean-up **as well as the authority to obligate any funds required to carry out all required and directed oil spill response activities.**
9.	Direct clean-up activities until properly relieved of this responsibility by regional or National on-scene Incident Commander or appropriate government authorities
10.	Develop and submit all required written notifications to the appropriate agencies concerning an incident

III. **In the event of an incident, the Incident Command System will be used in order to assure proper coordination between the operator, the qualified individual and the on-scene commander responsible for monitoring or directing the spill. A description of the organization and members are given below. The personnel to fill these roles will come from Environmental Safety and Health Consulting Services, Inc. or from internal company personnel who have been trained to fill these roles.**

ES&H/Forefront Emergency Management, L.P.
Incident Command Structure



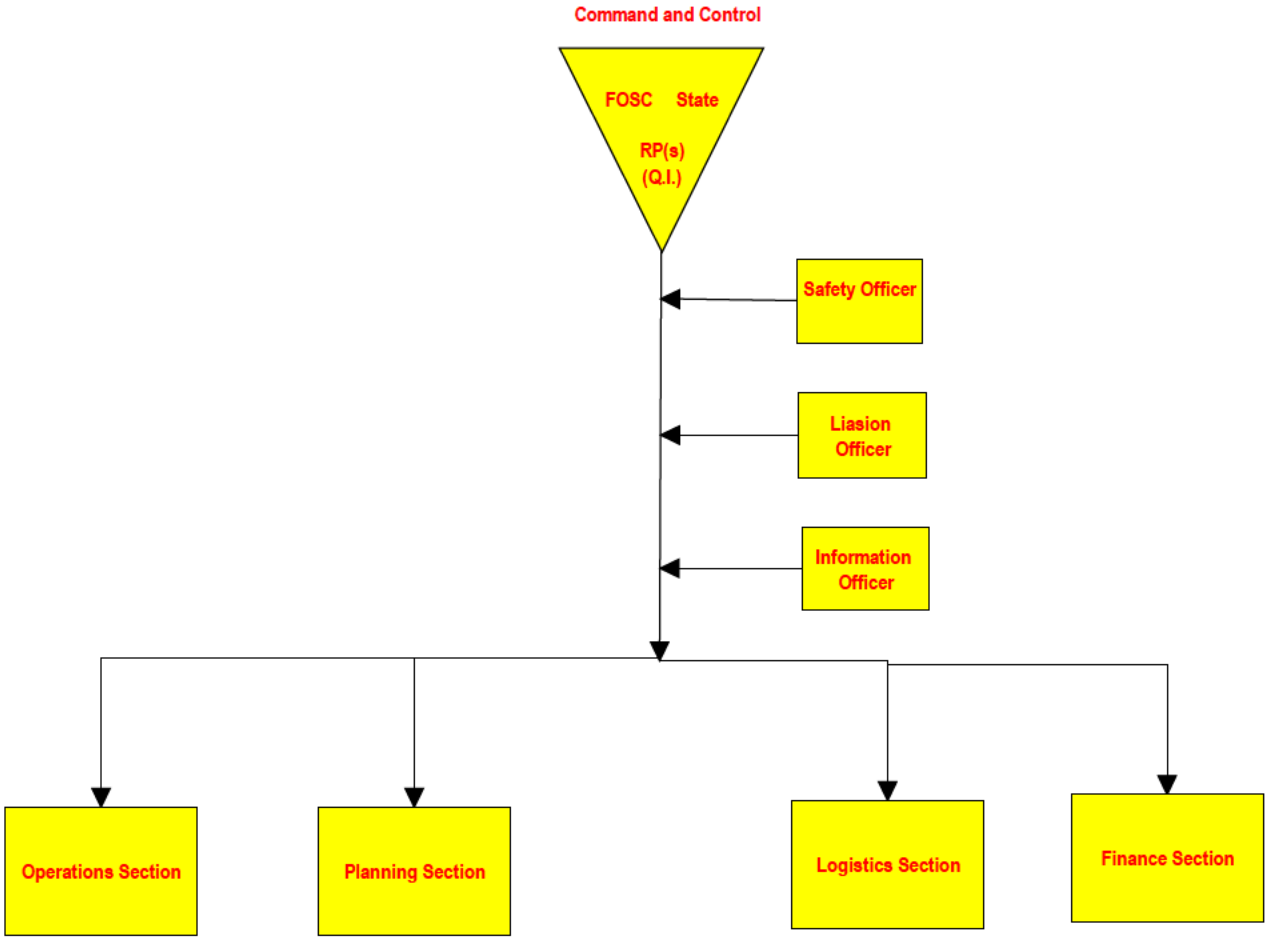
Alternate SMT Members:

Pat Bergeron	Ross Schexnayder	Kylie Daigle	Candice Wallace
Kevin Voisin	Chris Cortez	Sami McCune	Stephen Hood
Heidi Danos	Jared Champagne	Britney Cates	Nicole Boucher
Brian Folse	Jimmy Green	Elissa Hunter	Adam Reynolds
Mitchell Waits	Jennifer Smith	Kimberly Westmoreland	Kyle Swartzfager
Eric Gautier	Mark Armstrong	Ashlyn Holmes	Jacqueline Levett-Prinsep
Tyra Chatagnier	Dallin Coffman	Mary Scott	
Josh Caillouet	Matthew Veley	Brian Quarterman	
Kelly Watson	Sunny Portier	Jessica Johnson	
Brandi Lirette	Allie Martin	JayLynn Thibault	
Gregory Serigny	Lacie Pierce	Kristen Magee	
Todd Folse	Stephanie Duchamp	Lauren Dehart	

SPILL MANAGEMENT TEAM CONTACT NUMBERS							
Position	**Name**	**Work Address**	**Office (24 Hours)**	**Fax**	**Cell**	**E-mail**	**Response Time**
Qualified Individual(s)	Brian Folse	1730 Coteau Rd., Houma, LA 70364	887-437-2634	985-851-7480	(b) (6)	bfolse@esandh.com	<1.0 Hour
	Mitchell Waits	1730 Coteau Rd., Houma, LA 70364	887-437-2634	985-851-7480		mwaits@esandh.com	<1.0 Hour
	Eric Gautier	1730 Coteau Rd., Houma, LA 70364	887-437-2643	985-851-7480		egautier@esandh.com	<1.0 Hour
Alternate Qualified Individual(s)	Pat Bergeron	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		pat@esandh.com	<1.0 Hour
	Kevin Voisin	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		kevin@esandh.com	6.0 Hours
Incident Commander	Pat Bergeron	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		pat@esandh.com	<1.0 Hour
	(Alt.) Kevin Voisin	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		kevin@esandh.com	6.0 Hours
Safety Officer	Mitchell Waits	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		mwaits@esandh.com	<1.0 Hour
	(Alt.) Eric Gautier	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		egautier@esandh.com	<1.0 Hour
Liaison Officer	Ross Schexnayder	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		rschexnayder@esandh.com	<1.0 Hour
	(Alt.) Mitchell Waits	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		mwaits@esandh.com	<1.0 Hour
Information Officer	Sunny Portier	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		sportier@esandh.com	<1.0 Hour
	(Alt.) Heidi Danos	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		heidi@esandh.com	<1.0 Hour
Planning Section Chief	Eric Gautier	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		egautier@esandh.com	<1.0 Hour
	(Alt.) Mark Armstrong	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		marmstrong@esandh.com	<1.0 Hour
	(Alt.) Heidi Danos	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		heidi@esandh.com	<1.0 Hour
	(Alt.) Tyra Chatagnier	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		twells@esandh.com	<1.0 Hour
Operations Section Chief	Brian Folse	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		bfolse@esandh.com	<1.0 Hour
	(Alt.) Josh Caillouet	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		jcaillouet@esandh.com	<1.0 Hour
Logistics Section Chief	Josh Caillouet	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		jcaillouet@esandh.com	<1.0 Hour
	(Alt.) Ross Schexnayder	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		rschexnayder@esandh.com	<1.0 Hour
Finance Section Chief	Chris Cortez	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		ccortez@esandh.com	<1.0 Hour
	(Alt.) Kelly Watson	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		kwatson@esandh.com	<1.0 Hour
Alternate SMT Member	Jimmy Green	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		jgreen@esandh.com	6.0 Hours
Alternate SMT Member	Jennifer Smith	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		jsmith@esandh.com	6.0 Hours
Alternate SMT Member	Todd Folse	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		tfolse@esandh.com	6.0 Hours
Alternate SMT Member	Jared Champagne	4141 S. Beglis Parkway, Sulphur, LA 70665	877-437-2634	337-558-7546		jchampagne@esandh.com	3.5 Hours
Alternate SMT Member	Dallin Coffman	4141 S. Beglis Parkway, Sulphur, LA 70665	877-437-2634	337-558-7546		dcoffman@esandh.com	3.5 Hours
Alternate SMT Member	Gregory Serigny	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		gserigny@esandh.com	<1.0 Hour
Alternate SMT Member	Brandi Lirette	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		bbrewer@esandh.com	<1.0 Hour
Alternate SMT Member	Stephanie Duchamp	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		sduchamp@esandh.com	6.0 Hours
Alternate SMT Member	Allie Martin	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		amartin@esandh.com	<1.0 Hour

SPILL MANAGEMENT TEAM CONTACT NUMBERS							
Position	**Name**	**Work Address**	**Office (24 Hours)**	**Fax**	**Cell**	**E-mail**	**Response Time**
Alternate SMT Member	Kylie Daigle	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480	(b) (6)	kldaigle@esandh.com	<1.0 Hour
Alternate SMT Member	Matthew Veley	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		mveley@esandh.com	6.0 Hours
Alternate SMT Member	Sami McCune	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		smccune@esandh.com	<1.0 Hour
Alternate SMT Member	Lacie Pierce	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		lpierce@esandh.com	<1.0 Hour
Alternate SMT Member	Britney Cates	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		bcates@esandh.com	6.0 Hours
Alternate SMT Member	Elissa Hunter	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		ehunter@esandh.com	<1.0 Hour
Alternate SMT Member	Kimberly Westmoreland	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		kwestmoreland@esandh.com	<1.0 Hour
Alternate SMT Member	Ashlyn Holmes	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		amangham@esandh.com	<1.0 Hour
Alternate SMT Member	Mary Scott	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		mscott@esandh.com	<1.0 Hour
Alternate SMT Member	Brian Quarterman	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		bquarterman@esandh.com	<1.0 Hour
Alternate SMT Member	Jessica Johnson	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		jjohnson@esandh.com	<1.0 Hour
Alternate SMT Member	JayLynn Thibault	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		jthibault@esandh.com	6.0 Hours
Alternate SMT Member	Kristen Magee	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		kmagee@esandh.com	<1.0 Hour
Alternate SMT Member	Lauren Dehart	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		ldehart@esandh.com	<1.0 Hour
Alternate SMT Member	Candice Wallace	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		cwallace@esandh.com	<1.0 Hour
Alternate SMT Member	Stephen Hood	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		shood@esandh.com	<1.0 Hour
Alternate SMT Member	Nicole Boucher	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		nboucher@esandh.com	<1.0 Hour
Alternate SMT Member	Adam Reynolds	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		areynolds@forefrontem.com	6.0 Hours
Alternate SMT Member	Kyle Swartzfager	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		kswartzfager@esandh.com	<1.0 Hour
Alternate SMT Member	Jacqueline Levett-Prinsep	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		jlevett-prinsep@esandh.com	6.0 Hours
All ES&H/Forefront Emergency Management, L.P. personnel, listed in the table above, undergo annual SMT training under the direction of ES&H/Forefront Emergency Management, L.P.							

INCIDENT COMMAND STRUCTURE



Command and Control

The command and control section is responsible for the overall management of the incident. This section directs incident activities including the development and implementation of strategic decisions and approves the ordering and releasing of resources. This section is responsible, among other things, for the following responsibilities:

- Assess the situation and/or obtain incident briefing from prior Incident Commander
- Determine incident objectives and strategies
- Establish the immediate priorities
- Establish an incident command post
- Establish an appropriate organization
- Brief command staff and all section chiefs of changes
- Ensure planning meetings are scheduled as required
- Approve and authorize the implementation of an incident action plan

- Determine information needs and advise Command and General Staff
- Manage incident operations
- Approve request for additional resources and request for the release of resources
- Authorize the release of information to news media
- Ensure incident funding is available
- Notify natural resource trustees and coordinate with a NRDA representatives
- Coordinate incident investigation responsibilities
- Seek appropriate legal counsel
- Order the demobilization of the incident when appropriate

Safety Officer

The safety Officer is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. The safety Officer will correct unsafe acts or conditions through the regular line of authority, although the Safety Officer may exercise emergency authority to stop or prevent unsafe acts when immediate action is required. The Safety Officer maintains awareness of active and developing situations, ensures the preparation and implementation of the Site Safety Plan, and includes safety messages in each Incident Action Plan. His job duties include:

- Identify hazardous or unsafe situations associated with the incident by ensuring the performance of preliminary and continuous site characterization and analysis which shall include the identification of all actual or potential physical, biological, and chemical hazards known or expected to be present on site
- Participate in planning meetings to identify any health and safety concerns inherent in the operations daily work plan
- Review the Incident Action Plan for safety implications
- Exercise emergency authority to stop and prevent unsafe acts
- Investigate accidents that have occurred within incident areas
- Ensure the preparation and implementation of the site specific Health and Safety Plan (HASP) in accordance with the Area Contingency Plan (ACP) and State and Federal OSHA regulations. The HASP shall at a minimum address, include or contain the following elements:
    - Health and Safety hazard analysis for each site task or operation
    - Comprehensive operations work plan
    - Personnel training requirements
    - PPE selection requirements
    - Site specific occupational medical monitoring requirements
    - Air monitoring plan: area/personnel
    - Site control measures
    - Confined space entry procedures (if needed)
    - Pre-entry briefings (tailgate meetings): initial and as needed

  - Pre-operations health and safety conference for all incident participants
  - Quality assurance of HASP effectiveness
- Assign assistants and manage the incident safety organization
- Review and approve the medical plan

Liaison Officer

Incidents that are multi-jurisdictional, or have several agencies involved, may require the establishment of the Liaison Officer position on the command staff

- Provide a point of contact for assisting and cooperating with Agency Representatives
- Identify Agency Representatives from each agency including communications link and location
- Maintain a list of assisting and coordinating interagency contacts
- Assist in establishing and coordinating interagency contacts
- Keep agencies supporting incident aware of incident status
- Monitor incident operations to identify current or potential inter-organizational issues and advise Incident Command as appropriate
- Participate in planning meetings, provide current resource status information, including limitations and capabilities of assisting agency resources

Information Officer

The Information Officer is responsible for developing and releasing information about the incident to the news media, to incident personnel, and to the appropriate agencies and organizations.

Only one information officer will be assigned for each incident, including incidents operating under Unified Command and multi-jurisdictional incidents. The Information Officer may have assistants as necessary, and the assistants may also represent assisting agencies or jurisdictions. The Information Officer is responsible for the following task:

- Determine from the Incident Commander if there are any limits on information release
- Develop material for use in media briefings
- Obtain Incident Commander approval for media releases
- Inform media and conduct media briefings
- Arrange for tours and other interviews or briefings that may be required
- Obtain media information that may be useful to incident planning
- Maintain current information summaries and/or displays on the incident and provide information on status of incident to assigned personnel

Operations Section

The Operations Section Chief is responsible for the management of all operations directly applicable to the primary mission. The Operations Chief activates and supervises elements in accordance with the Incident Action Plan and directs its execution; activates and executes the Site Safety Plan; directs the preparation of unit operational plans, request or releases resources, makes expedient changes to the Incident Action Plans as necessary, and reports such to the Incident Commander. The Operations section chief is further responsible for the following task:

- Develop operations portion of the Incident Action Plan
- Brief and assign operations personnel in accordance with Incident Action Plan
- Supervise the execution of the Incident Action Plan for operations
- Request resources needed to implement the operation's tactics as part of the Incident Action Plan development
- Ensure safe tactical operations
- Make or approve expedient changes to the Incident Action Plan during the operational period as necessary
- Approve suggested list of resources to be released from assigned status (not released from incident)
- Assemble and disassemble teams/task forces assigned to operations section
- Report information about changes in the implementation of the IAP, special activities, events, and occurrences to the Incident Commander as well as to the Planning Section Chief and Information Officer

Planning Section

The planning section chief is responsible for the collection, evaluation, dissemination and use of information about the development of the incident and status of resources. Information is needed to 1) understand the current situation, 2) predict probable course of incident events, and 3) prepare alternative strategies for the incident. His task includes the following duties:

- Activate planning section units
- Assign available personnel already on site to ICS organizational positions as appropriate
- Collect and process situation information about the incident
- Supervise preparation of the Incident Action Plan
- Provide input to the Incident Command and Operations Section Chief in preparing the Incident Action Plan
- Participate in planning and other meetings as necessary
- Establish information requirements and reporting schedules for all ICS organizational elements for use in preparing the Incident Action Plan
- Determine need for any specialized resources in support of the incident

- Provide resources unit with planning section's organizational structure including names and locations of assigned personnel
- Assign technical specialist where needed
- Assemble information on alternative strategies
- Assemble and disassemble teams or task forces as necessary
- Provide periodic predictions on incident potential
- Compile and display incident status summary information
- Provide status reports to appropriate requesters
- Advise general staff of any significant changes in incident status
- Incorporate the incident traffic plan, vessel routing plan, and other supporting plans into the Incident Action Plan
- Instruct planning section units in distribution and routing of incident information
- Prepare recommendations for release of resources for submission to members of incident command
- Maintain section records

Logistics Section

The logistics section chief is responsible for providing facilities, services, and material in support of the incident. The logistics section chief participates in the development and implementation of the Incident Action Plan and activates and supervises Branches and Units within the logistics section. His task includes the following duties;

- Plan organization of Logistics section
- Assign work locations and preliminary work tasks to section personnel
- Notify resources unit that logistics section is activated including the names and locations of assigned personnel
- Assemble and brief branch directors and unit leaders
- Participate in preparation of the Incident Action Plan
- Identify service and support requirements for planned and expected operations
- Provide input to and review Communications Plan, Medical Plan, Traffic Plan and Vessel Routing Plan.
- Coordinate and process request for additional resources
- Review Incident Action Plan and estimate section needs for next operational period
- Advise on current service and support capabilities
- Prepare service and support elements of the Incident Action Plan
- Estimate future service and support requirements
- Receive demobilization plan from Planning section
- Recommend release of unit resources in conformance with demobilization plan
- Ensure general welfare and safety of Logistics section personnel

Finance Section

The Finance/Administration section chief, a member of the general staff, is responsible for all financial and cost analysis aspects of the incident and for supervising members of the Finance/Administration Section.

- Attend briefing with responsible agency to gather information
- Attend planning meetings to gather information on overall strategy
- Determine resource needs
- Develop an operating plan for Finance/Administration function on incident
- Prepare work objectives for subordinates brief staff, make assignments, and evaluate performance
- Inform members of the unified command and general staff when section is fully operational
- Meet with assisting and cooperating agency representatives as required
- Provide input in all planning sessions on financial and cost analysis matters
- Maintain daily contact with agency administrative headquarters on finance matters
- Ensure that all personnel time records are transmitted to home agencies according to policy
- Participate in all demobilization planning
- Ensure that all obligation documents initiated at the incident are properly prepared and completed
- Brief agency administration personnel on all incident related business management issues needing attention and follow-up prior to leaving incident

RESPONSE MANAGEMENT AND DOCUMENTATION

In order to ensure proper documentation of the decision-making process, activities, and costs, Discovery Producer Services follows the National Interagency Incident Management System (NIIMS) including the NIIMS Incident Action Plan (IAP) Form system. Through contractual agreements, Discover Producer Services has access to a digital database system capable of producing, storing, and electronically transmitting appropriate IAP documentation.

During each phase of a response, all members of the Spill Management Team will document their actions on unit logs that will be maintained through the incident. At the end of each operating period, an Incident Action Plan will be developed by the Planning Section to document the events that have taken place and plan for future operations.

IV. In the event of an incident, equipment for response activities is available on a 24-hour basis at the following locations:

Company Name	Location	24-hour Contact Information
ES&H The Total Assurance Team	Gulf Coast 1730 Coteau Rd. Houma, LA 70364	877-437-2634
Clean Gulf Associates	650 Poydras Street, Suite 1020 New Orleans, LA 70130	888-242-2007
AMPOL	Gulf Coast 401 West Admiral Doyle New Iberia, LA 70560	337-365-7847
Discovery Producer Services does not maintain any emergency response equipment; therefore, no discussion of company owned resources is present in this plan.		

Please see the list of equipment available for use during an incident located in the previous section.

DISPOSAL CONTRACTORS

Waste generated during a worst case discharged will be properly disposed off at one the facilities listed below:

- Waste Management – Walker, LA
- USLLA dba R360 Environmental Solutions – Bourg, LA
- Houma Salt Water Disposal – Houma, LA
- Newpark Drilling Fluids – Multiple locations

DISPOSAL PLAN

Procedures for Waste Disposal:

- Waste oil and other debris will be recovered by HAZWOPER trained technicians
- Recovered liquid products will be temporarily stored in oil barges or vacuum trucks depending on the accessibility of the recovery area.
- Recovered debris, solid waste, or contaminated soils will be temporarily stored in properly lined open top hopper boxes and/or roll-off boxes on-site.
- A representative grab sample will be collected from the waste to be analyzed as per the requirements of the disposal facility. In general, a Full TCLP analysis will be required to dispose of oil contaminated debris, waste, or soils; however, in some situations only a TCLP Benzene will be required.
- Upon receipt of the results of these analyses, a waste profile will be developed at the appropriate waste disposal facility as given in the table on the preceding page.
- Upon approval of the results, the product will be transported to the appropriate facility.

The above described procedures have been developed with consideration for the federal, state, and local requirements for waste disposal as given in the applicable ACP's for this operating environment.

The mobilization of personnel, vacuum trucks, and barges necessary to accomplish the waste disposal procedures described above for the pipeline covered in this plan will primarily be mobilized from the Houma, LA area and is expected to be able to be mobilized within 4 Hours.

WASTE DISPOSAL CONTRACTORS AND PROCEDURES CONTINUED

As outlined in the New Orleans/ Baton Rouge Coast Guard ACP, the disposal procedures shall include and/or consider:

Section 560: Temporary Storage, Treatment, Disposal

The disposal of contaminated waste associated with pollution response activities is a critical issue which must be addressed prior to the spill incident. The procedures for disposing of all contaminated waste from a spill must be in place to ensure safe, proper and legal disposal of these products. Louisiana and Mississippi DEQs are responsible for providing guidance on all disposal issues, including storage and transportation. State permits are required for generating, storing, transporting and disposing of non-hazardous and hazardous waste. DEQs also are responsible for issuing State permits to dispose of oils or hazardous wastes during removal operations.

Section 561: Disposal Process

The disposal process follows a series of steps. In general, the following events should occur.

- Identify the pollutant and classify as hazardous or non-hazardous. (Note: Identification of material should not delay the next step).
- Notify proper federal, state and local authorities.
- Review federal, state and local laws/regulations.
- Calculate the volume of oil or hazardous substance for disposal.
- Identify disposal options and/or locations (on site vs. offsite); consider recycling or reclamation.
- Obtain necessary permits.
- Secure transportation for product disposal.
- Outline the disposal plan.

RESPONSE STRATEGIES

Please refer to the Response Zone 2 Appendix for a discussion of appropriate booming strategies and response methods as given in the USCG One Gulf Plan Morgan City Geographic Response Plan and the USCG One Gulf Plan New Orleans Geographic Response Plan.

LISTS OF CONTACTS

I. In the event of an incident, the operator or qualified individual will make the following notifications in the order given below.

Entity	Phone #	Status
Louisiana State Police	225-925-6595	As Required within 1 Hour
Lafourche Local Emergency Planning Committee St. Charles Local Emergency Planning Committee	985-537-7603/ 985-637-5195 985-783-5050	As Required within 1 Hour
Louisiana Department of Environmental Quality	225-925-6595	As Required within 1 Hour
National Response Center	800-424-8802	As Required
U.S.C.G. MSU Houma U.S.C.G. Sector New Orleans U.S.C.G. MSU Morgan City	985-850-6400 504-365-2200 985-380-5320	As Required
Louisiana Oil Spill Coordinators Office (LOSCO)	Hotline: 225-200-1921 Office: 225-925-6606	As Required
ES&H (Contracted OSRO)	877-437-2634	When clean-up is required
Internal Corporate personnel as given in the table below	As warranted by severity of incident	As Required
Louisiana Department of Natural Resources	225-342-5540	As Required

II. In the event of an incident, the personnel discovering the spill shall notify

EMPLOYEE CONTACT LIST			
This pipeline is monitored and operated by control room personnel on a 24-Hour Basis. Any detection of abnormal operations will prompt a notification to the Q.I. or A.Q.I. notated below.			
NAME & TITLE	**WORK #**	**MOBILE #**	**HOME #**
Dale Fincher Pipeline Supervisor **Q.I.**	985-798-5907	(b) (6)	

EMPLOYEE CONTACT LIST (CONTINUED)		
Raymond Gonzales Pipeline COM (Onshore) **Q.I.**	985-798-5910	(b) (6)
Calbert Dufrene Manager of DPS Operations	985-798-5925	
Kirk Lee Pipeline COM (Offshore) **Q.I.**	985-798-5906	
Darryl Benoit Operations Supervisor	985-798-5919	
Phil Roddy Maintenance Supervisor	985-798-5959	
Charles Folse Safety Representative	985-798-5918	
Jerry Knight Manager of Tech Services	985-798-5917	
James Adams Maintenance COM	985-798-5924	
Judy Dyson Lead FOA	985-798-5916	

Tulsa Gas Control Information	
1-800-635-7400 **1-918-574-9316**	
Control Room	
Larose Control Room Larose Control Room Alternate #	985-798-5902 985-258-1649
Paradis Control Room Paradis Control Room Alternate #	985-758-4111 985-258-8333

III. In the event of an incident, the qualified Individual shall notify the following companies to activate response resources:

Name (Region)	Company	24-Hour#	Address
Rob Cannon	ES&H The Total Assurance Team	877-437-2634	Gulf Coast 1730 Coteau Rd. Houma, LA 70364
Franky Palmisano	Clean Gulf Associates	888-242-2007	650 Poydras Street, Suite 1020 New Orleans, LA 70130
Kurt Headly	AMPOL	337-365-7847	Gulf Coast 401 West Admiral Doyle New Iberia, LA 70560

TRAINING PROCEDURES

Discovery Producer Services has designed the following training regimine for the personnel with duties under this response plan. This program has been designed to meet the training requirements for Qualified Individuals and Incident Commanders given in the Code of Fderal Regulations sections given below:

- 33 CFR PART 154
- 49 CFR PART 194
- 40 CFR PART 112
- 29 CFR PART 1910.120

This program includes a significant amount of inhouse training on the operation and use of the systems controlling the Discovery Producer Services pipeline operations. This training specifically addresses the employees knowledge of the internal operating procedures of Discovery Producer Services. The goal of this training is to insure that these individuals are capable of the following:

A. Activate internal alarms and hazard communication system to notify all facility personnel;
B. Notify all response personnel as needed;
C. Identify the character, exact source, amount, and extent of the release, as well as the other appropriate items needed for notification;
D. Notify and provide necessary information to the federal, state and local authorities with designated response roles including:
    1. The National Response Center
    2. The State Emergency Response Commission
    3. The Local Emergency Planning Committee
E. Assess the interaction of the spilled substance with water and/or other substances stored at the facility and notify response personnel at the scene of that assessment;
F. Assess the possible hazards to human health and the environment due to the release. This assessment must consider both the direct and indirect effects of the release (i.e., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat induced explosion);
G. Assess and implement prompt removal actions to contain and remove the substance released;
H. Coordinate rescue and response actions as previously arranged with all response personnel;
I. Use authority to immediately access company funding to initiate clean-up activities;
J. Direct clean-up activities until properly relieved of this responsibility.

Additionally, the Qualified Individuals identified in this response plan will undergo training from indusrty professionals in the following issues:

- **24-hour HAZWOPER (8-Hour Refresher)**

DOT RELATED TRAINING

Discovery Producer Services internal training system is designed to ensure that:

All Personnel Know –

- Their responsibilities under the response plan
- The name and address of, and the procedure for contacting, the operator on a 24-hour basis
- The name of, and procedures for contacting, the qualified individual on a 24-hour basis

Reporting Personnel Know –

- The content of the information summary of the response plan
- The toll-free telephone number of the National Response Center
- The notification process

Personnel Engaged in Response Activities Know –

- The characteristics and hazards of the oil discharged
- The conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures, and the appropriate corrective actions
- The steps necessary to control any accidental discharge of oil and to minimize the potential for fire, explosion, toxicity, or environmental damage
- The proper firefighting procedures

Discovery Producer Services shall maintain a training record for each individual that has been trained as required by this section. These records will be maintained as long as the individual has assigned duties under this response plan in the following manner:

- Records for operator personnel will be maintained at the Discovery Producer Services' Headquarters, in Tulsa, Oklahoma.
- Records for personnel engaged in response operations will be maintained at the Discovery Producer Services' Headquarters, in Tulsa, Oklahoma.

EXERCISE PROCEDURES

The responsibility for ensuring the appropriate planning, facilitation, and monitoring of the drills described in this section will be with Discovery Producer Services conjunction with ES&H/Forefront Emergency Management, L.P.

The drill procedures described in this section will be conducted in such a fashion as to ensure that all aspects of the response plan are exercised at least every three years for each response zone.

EXERCISE PROCEDURES

OWNER OR OPERATOR INTERNAL NOTIFICATION EXERCISES

Onshore Transportation – Related Pipelines

Applicability: Pipeline owner or operator

Frequency: As indicated by the response plan and, at a minimum, consistent with triennial cycle (quarterly).

Party Initiating Exercise: As indicated in response plan.

Participants: Facility response personnel and the facility's qualified individuals.

Scope: Exercise notification process between key facility personnel and the qualified individual to demonstrate the accessibility of the qualified individual.

Objectives: Contact by telephone, radio, message – pager, or facsimile and confirmation established as indicated in response plan.

Format: As indicated in response plan.

Certification: Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by Research and Special Programs Administration (PHMSA) during regular inspections***** or PHMSA tabletop exercises.

*** Verification will not be done by inspection in the near term.**

Records:

Retention: 3 years

Location: Owner or operator shall retain records as indicated in response plan.

PHMSA to retain verification records

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

INTERNAL TABLETOP EXERCISE

Onshore Transportation – Related Pipelines

Applicability: Pipeline owner or operator.

Frequency: As indicated by the response plan and, at a minimum, consistent with the triennial (annually).

Party Initiating Exercise: As indicated in response plan.

Participants: Designated spill emergency response team members.

Scope: Demonstration of the response team's ability to organize, communicate, and make strategic decisions regarding population and environmental protection during a spill event.

Objectives: Designated emergency response team members should demonstrate –

(1) Knowledge of facility response plan;

(2) Ability to organize team members to effectively interface with a unified command;

(3) Communication capability; and

(4) Coordination for response capability as outlined in response plan.

Format: Internal tabletop exercise as outlined in response plan.

Certification: Self-certification as indicated in response plan or as defined in the "Guiding Principles" section of this document,

whichever is more stringent. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by PHMSA during regular inspections * or PHMSA tabletop exercises.

*** Verification will not be done by inspections in the near term.**

Records:

Retention: 3 years.

Location: Owner or operator shall retain records as indicated in response plan.

PHMSA to retain verification records

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

OWNER/OPERATOR EQUIPMENT DEPLOYMENT EXERCISES

Onshore Transportation – Related Pipelines

Applicability: Pipelines owner or operator.

Frequency: As indicated by the response plan and, at a minimum, consistent with the triennial cycle (annually).*

*** The number of equipment deployment exercises conducted should be such that equipment and personnel assigned to each response zone are exercised at least once per year. If the same personnel and equipment response to multiple equipment respond to various response zones, each must participate in an annual equipment deployment exercise.**

Party Initiating Exercise: As indicated in response plan.

Participants: Designated spill emergency response team members.

Scope: Demonstrate ability to deploy spill response equipment * identified in the FRP.

*** May consist entirely of operator owned equipment, or a combination of OSRO and operator equipment.**

Objectives: Designated emergency response personnel should demonstrate - -

(1) Ability to organize; and

(2) Ability to deploy and operate representative types of key response equipment as described in response plan.

Format: Announced deployment exercise indicated in response plan.

Certification: Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by PHMSA during regular inspections* or PHMSA tabletop exercises.

***Verification will not be done by inspections in the near term.**

Records:

Retention: 3 years.

Location: Owner or operator shall retain records as indicated in response plan.

PHMSA to retain verification records

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

UNANNOUNCED EXERCISES

Onshore Transportation – Related Pipelines

Applicability: Pipeline owner/operator.

Frequency: Maximum of 2 unannounced PHMSA exercises conducted annually for the pipeline industry as a whole. A single owner or operator will not be required to participate in a PHMSA – initiated unannounced exercise, if they have already participated in one within the previous 36 months.

Party Initiating Exercise: PHMSA.

Participants: Designated spill emergency response team members.

Operations Staff.

On-Scene Coordinator (optional).

State and local government (optional).

Scope: Demonstrate ability to respond to a worst-case discharge spill event.

Objectives: Designated emergency response team member should demonstrate adequate knowledge of their facility response plan and the ability to organize, communicate, coordinate, and respond in accordance with that plan.

Format: Unannounced tabletop exercise to discuss strategic issues.

Operations will provide the owner or operator the following information at least 10 working days in advance (1) date, time, and location of exercise; (2) expected exercise duration; and (3) response zone to be exercised.

On the day of the exercise, the pipeline owner or operator will be provided the scenario and post – spill events. This information will be used to explore and discuss strategic issues that will help operators evaluate their response plans.

Certification: Certification can be effected by PHMSA personnel conducting the exercise. PHMSA will provide written certification of the exercise date, participants, and response zone exercised.

Verification: Verification can be made by PHMSA personnel conducting the exercise.

Records:

Retention Time: 3 years.

Location: Owner or Operator shall retain records as indicated in response plan.

PHMSA to retain verification records

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

Discovery Producer Services Internal Exercise Documentation Form

Qualified Individual Notification Exercise

1.	**Date Performed:**	
2.	**Exercise or Actual Response?**	
3.	Facility Involved:	
4.	Persons Involved:	
5.	Time Initiated:	
6.	Time QI Responded:	
7.	**Method of Contact:** *(telephone, pager, radio, other)*	
8.	**Notification Procedure:**	
9.	**Core Components Exercised:**	

I hereby certify that this drill has been conducted in the form described by The National Preparedness for Response Exercise Program (PREP) Guidelines in order to satisfy the requirements of 30 CFR 254, 33 CFR 154, 40 CFR 112, and 49 CFR 194.

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Discovery Producer Services

Discovery Producer Services Internal Exercise Documentation Form

Equipment Deployment Exercise

1.	**Date Performed:**	
2.	**Time Performed (Begin-End)**	
3.	Exercise or Response	
4.	Persons Involved	
5.	Facility Involved	
6.	OSRO Involved	

7.	**Description of Exercise**

8.

Equipment Deployed	Equipment Condition

9.

Exercise Objectives	Exercise Outcome

10.

Parts of Facility Response Plan Addressed by This Exercise	
2	Staff Mobilization
3.a.4	Unified Command / Responsible Party Representation
3.b.6	Response Management System / Containment
3.b.7	Response Management System / Recovery
3.b.8.1	Response Management System / Protection/Protective Booming
10	Communications
11.2	Waterborne Transportation
12.1	Personnel Support / Management
13.1	Equipment Maintenance & Support / Response Equipment
13.2	Equipment Maintenance & Support / Support Equipment
14.1	Procurement / Personnel
14.2	Procurement / Response Equipment
14.3	Procurement / Support Equipment
15	Documentation

11.	Lessons Learned

I hereby certify that this drill has been conducted in the form described by The National Preparedness for Response Exercise Program (PREP) Guidelines in order to satisfy the requirements of 30 CFR 254, 33 CFR 154, 40 CFR 112, and 49 CFR 194.

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Discovery Producer Services

Discovery Producer Services Internal Exercise Documentation Form

Tabletop Exercise

1.	**Date Performed:**	
2.	**Exercise or Response:**	
3.	Facility Involved:	
4.	Time (start-stop):	
5.	Product Type and Amount for (simulated) spill	
6.	Personnel Involved	

7.	**Description of Exercise**
	a) Spill management team's knowledge of oil-sill response plan:
	b) Proper Notifications:
	c) Communications System:
	d) Spill management team's ability to access contracted OSRO:

e) Spill management team's ability to coordinate spill response with On-Scene Coordinator, state, and applicable agencies:
f) Spill management team's ability to access sensitive site and resource information in the Area Contingency Plan:

8.

Parts of Facility Response Plan Addressed by This Exercise	
1	Notifications
2	Staff Mobilization
3.a	Unified Command
3.b	Response Management System
4	Discharge Control
5	Assessment
6	Containment
7	Recovery
8	Protection
9	Disposal
10	Communications
11	Transportation
12	Personnel Support
13	Equipment Maintenance & Support
14	Procurement
15	Documentation

9.	Lessons Learned

I hereby certify that this drill has been conducted in the form described by The National Preparedness for Response Exercise Program (PREP) Guidelines in order to satisfy the requirements of 30 CFR 254, 33 CFR 154, 40 CFR 112, and 49 CFR 194.

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Discovery Producer Services

RESPONSE PLAN REVIEW AND UPDATE PROCEDURES

The review and update procedures used for this response plan shall conform to 49 CFR part 194.121 and will include at a minimum:
A. Each operator shall review its respone plan at least every (5) years from the date of submission and modify the plan to address new or different operating conditions or information included in the plan. Furthermore, the operator will review and resubmit this plan to PHMSA at (5) year intervals.
B. If a new or different operating condition or information would substantially affect the implementation of a response plan, the operator must immediately modify its response plan to address such a change and, within 30 days of making such a change, submit the change to PHMSA. Examples of changes in operating conditions that would cause a significant change to an operators response plan are:
1. An extension of an exsisting pipeline or construction of a new pipeline in a response zone not covered by the previously approved plan;
2. Relocation or replacement of the pipeline in a way that substantially affects the information included in the respone plan, such as to change the worst case discharge volume;
3. The type of oil transported, if the type affects the required response resources, such as a change from crude oil to gasoline;
4. The name of the oil spill removal organization;
5. Emergency Response Procedures;
6. The Qualified Individual;
7. A change in the NCP or an ACP that has significant impact on the equipment appropriate for response activities; and
8. Any other information relating to circumstances that may affect full implementation of the plan.
C. If PHMSA determines that a change to a response plan does not meet the requirements of this part, PHMSA will notify the operator of any alledged deficiencies, and provide the operator an opportunity to respond, including an opportunity for an informal conference, to any proposed plan revisions and an opportunity to correct any deficiencies.
D. An Operator who disagrees with a determination that proposed revisions to a plan are deficient may petition PHMSA for reconsideration, within 30 days from the date of receipt of PHMSA's notice. After considering all relevant material presented in writing or at the conference, PHMSA will notify the operator of its final decision. The operator must comply with the final decision within 30 days of issuance unless RSPA allows additional time.
E. The operator will also review the response plan for its effectiveness upon completion of any worst case discharge in which the response plan was implemented to direct spill operations. The operator shall also incorporate any necessary revisions to the procedures outlined in this plan as they are found during

	the course of such a response. It will be the responsibility of Discovery Producer Services working in conjunction with ES&H/Forefront Emergency Management, L.P., to ensure any revisions are properly incorporated after any incident in which the response plan is utilized.
F.	The operator will also review the response plan for its effectiveness upon completion of any worst case discharge drill in which the response plan was implemented to direct drill operations. The operator shall also incorporate any necessary revisions to the procedures outlined in this plan as they are found during the course of such a drill. It will be the responsibility of Discovery Producer Services working in conjunction with ES&H/Forefront Emergency Management, L.P., to ensure any revisions are properly incorporated after any drill in which the response plan is utilized.

RECORD OF CHANGES				
When this plan is updated, the updated section(s) will be listed in this table along with the date and authorization required.				
Date	**Type of Revision**	**Updated Section(s)**	**Description of Updates**	**Authorization**
2003	Initial Draft		-	Dale Fincher
November 2004	Annual Review	-	-	Dale Fincher
2005	Annual Review	-	-	Dale Fincher
June 2006	Annual Review	-	-	Dale Fincher
October 2007	Annual Review	-	-	Dale Fincher
December 2008	Annual Review	-	-	Dale Fincher
September 2009	Annual Review	-	-	Dale Fincher
August 2010	Annual Review	-	Reviewed and revised entire manual.	Dale Fincher
August 2011	Annual Review	-	No Revisions Needed	Dale Fincher
August 2012	Annual Review	-	No Revisions Needed	Dale Fincher
August 2013	Annual Review	-	No Revisions Needed	Dale Fincher
May 2014	Annual Review	Cover Page; Potential Spill Site Maps; Valve Site Maps; OSRO Information; Pages 3-4, 7-11, 13, 20, 23-24, 31-45, & 53-54	**Cover Page** – Updated company logo **Pages 3-4** – Updated employee contact list **Potential Spill Site Maps** – Updated company logo **Page 7** – Updated worst case discharge **Page 8** – Updated key pipeline segment areas and systems	Dale Fincher

RECORD OF CHANGES				
When this plan is updated, the updated section(s) will be listed in this table along with the date and authorization required.				
Date	**Type of Revision**	**Updated Section(s)**	**Description of Updates**	**Authorization**
May 2014	Annual Review	Cover Page; Potential Spill Site Maps; Valve Site Maps; OSRO Information; Pages 3-4, 7-11, 13, 20, 23-24, 31-45, & 53-54	**Valve Site Maps** – Updated company logo **Page 9** – Updated agency contact information **Pages 10-11** – Updated emergency contact list **Page 13** – Updated communication equipment information **Page 20** – Updated OSROs **OSRO Information** – Addition of ES&H, AMPOL, & CGA contracts and updated ES&H equipment list **Page 23** – Updated ICS flowchart **Pages 24a-b** – Updated SMT contact list **Page 31** – Updated OSROs **Page 32** – Updated waste disposal contractors **Page 33** – Updated waste disposal contractors and procedures continued and response strategies **Pages 34-35** – Updated employee contact list **Page 36** – Updated OSROs and the contact **Page 37** – Updated training procedures **Pages 39-45** – Updated exercise procedures **Pages 46-52** – Updated page numbers **Pages 53-54** – Updated response review and update procedures	Dale Fincher

PRODUCER SERVICES

Department of Transportation Onshore Oil Pipeline Response Manual

RESPONSE ZONE 2 – NGL

Larose Processing Plant to the Paradis Plant
18”, 14”, and 10” NGL Pipeline

Prepared By:

1730 Coteau Road
Houma, LA 70364
985-851-5055
consulting@esandh.com
www.esandh.com

Prepared in accordance with:
Code of Federal Regulations; Title 49, part 194

INFORMATION SUMMARY

OWNER/OPERATOR INFORMATION	
Name:	Discovery Producer Services
Street Address:	Larose Gas Plant 1474 Highway 24 P.O. Box 1699
City/State/Zip:	Larose, LA 70373
Contact Name:	Dale Fincher
Contact Title:	Pipeline Supervisor/Q.I.
Contact Telephone #:	985-798-5907 (O)/ 985-859-7669 (M)

EMPLOYEE CONTACT LIST

This pipeline is monitored and operated by control room personnel on a 24-Hour Basis. Any detection of abnormal operations will prompt a notification to the Q.I. or A.Q.I. notated below.

NAME & TITLE	WORK #	MOBILE #	HOME #
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Kirk Lee Pipeline COM (Offshore) **Q.I.**	985-798-5906		
Darryl Benoit Operations Supervisor	985-798-5919		
Phil Roddy Maintenance Supervisor	985-798-5959		
Charles Folse Safety Representative	985-798-5918		
Jerry Knight Manager of Tech Services	985-798-5917		

EMPLOYEE CONTACT LIST (CONTINUED)		
James Adams Maintenance COM	985-798-5924	(b) (6)
Judy Dyson Lead FOA	985-798-5916	

Tulsa Gas Control Information	
1-800-635-7400 **1-918-574-9316**	
Control Room	
Larose Control Room Larose Control Room Alternate #	985-798-5902 985-258-1649
Paradis Control Room Paradis Control Room Alternate #	985-758-4111 985-258-8333

I. In the event of an incident, the operator or qualified individual will make the following notifications in the order given below.

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Louisiana Department of Environmental Quality	225-925-6595	As Required within 1 Hour
National Response Center	800-424-8802	As Required
U.S.C.G. MSU Houma U.S.C.G. Sector New Orleans U.S.C.G. MSU Morgan City	985-850-6400 504-365-2200 985-380-5320	As Required
Louisiana Oil Spill Coordinators Office (LOSCO)	Hotline: 225-200-1921 Office: 225-925-6606	As Required
ES&H (Contracted OSRO)	877-437-2634	When clean-up is required
Internal Corporate personnel as given in the table below	As warranted by severity of incident	As Required
Louisiana Department of Natural Resources (DNR)	225-342-5540	As Required

II. In the event of an incident, the personnel discovering the spill shall notify

EMPLOYEE CONTACT LIST			
This pipeline is monitored and operated by control room personnel on a 24-Hour Basis. Any detection of abnormal operations will prompt a notification to the Q.I. or A.Q.I. notated below.			
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James Adams Maintenance COM	985-798-5924
Judy Dyson Lead FOA	985-798-5916

(b) (6) [redacted]

Tulsa Gas Control Information

1-800-635-7400
1-918-574-9316

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Paradis Control Room Paradis Control Room Alternate #	985-758-4111 985-258-8333

SIGNIFICANT AND SUBSTANTIAL HARM DETERMINATION

SIGNIFICANT AND SUBSTANTIAL HARM DETERMINATION

This response zone has been determined to present a threat of significant and substantial harm to the environment in the event of a discharge of oil into or on the navigable waters or adjoining shorelines as described in 49 CFR 194.103. The pipeline varies between sections of 18", 14", and 10" in diameter and although it is less than 10 miles in length, it is part of a larger system that exceeds the 10 mile criteria. Additionally, this response zone poses a specific threat under these regulations for the following two reasons:

- The pipeline is located within a (1) mile radius of potentially affected environmentally sensitive areas, and could reasonably be expected to reach these areas.

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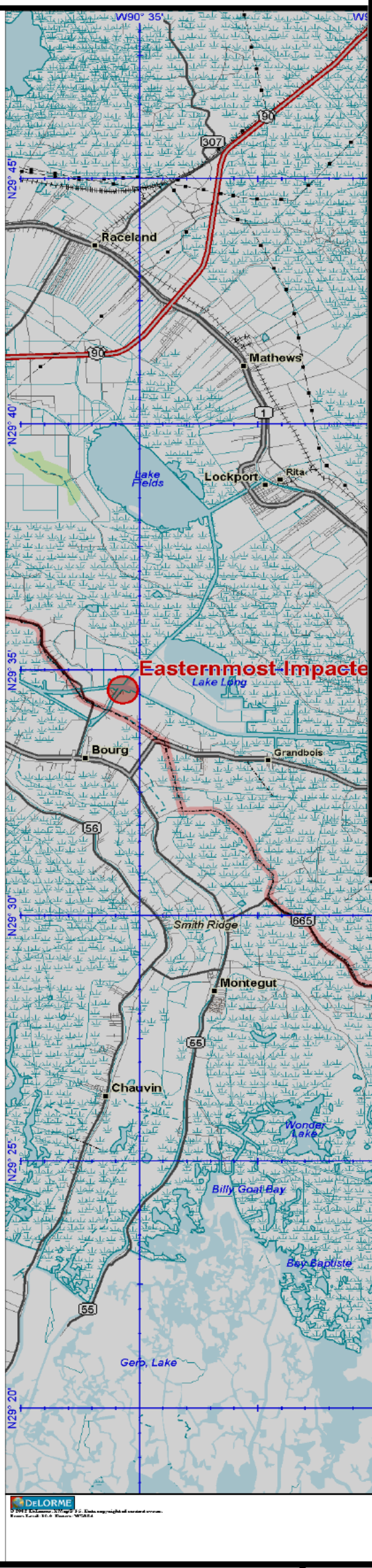

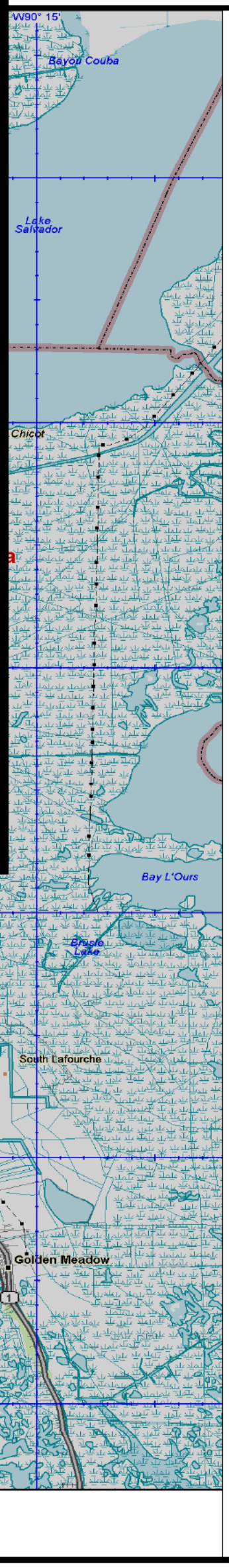

X

Potential Spill Site

DISCOVERY PRODUCER SERVICES
DOT ONSHORE OIL PIPELINE
RESPONSE MANUAL

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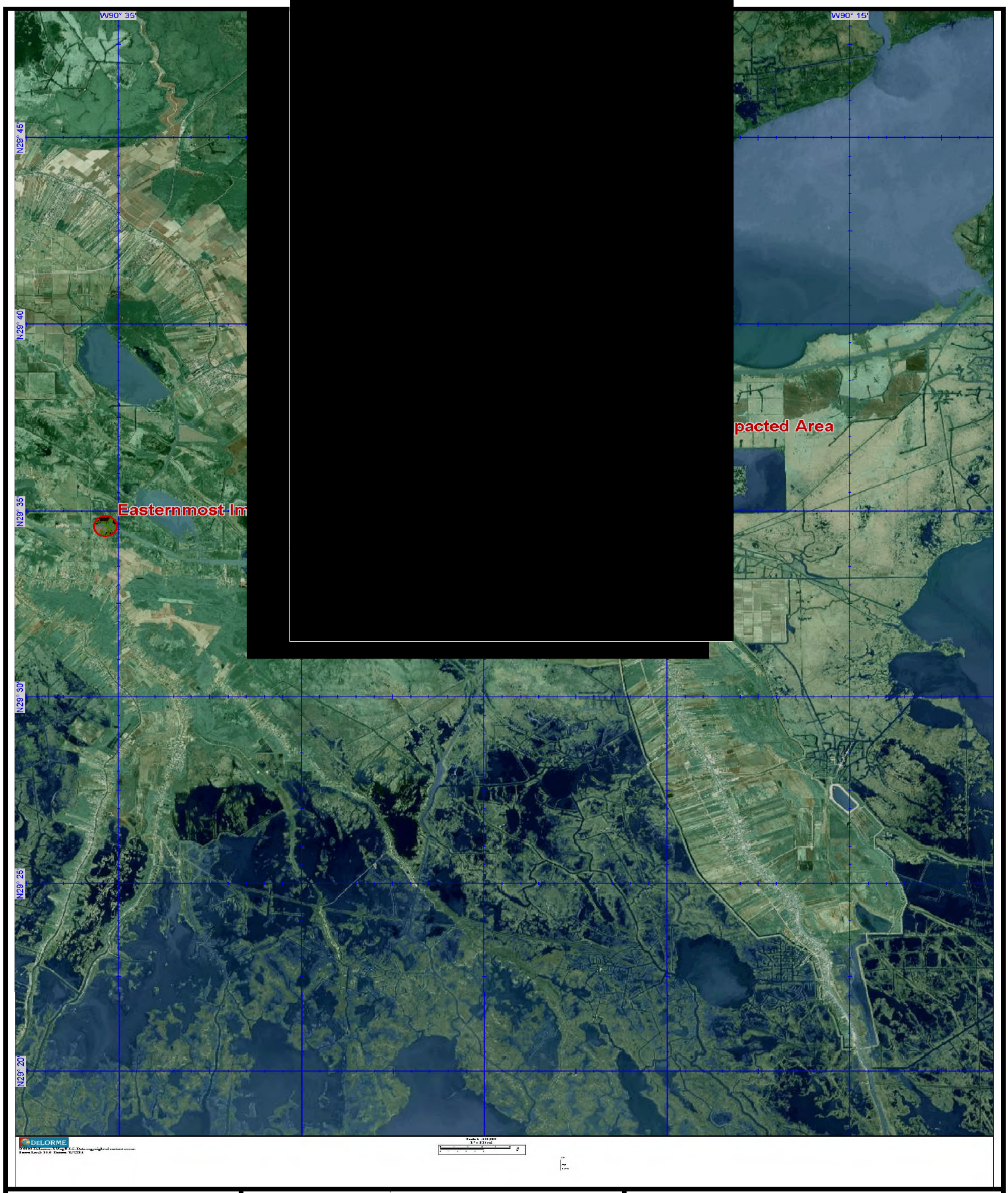
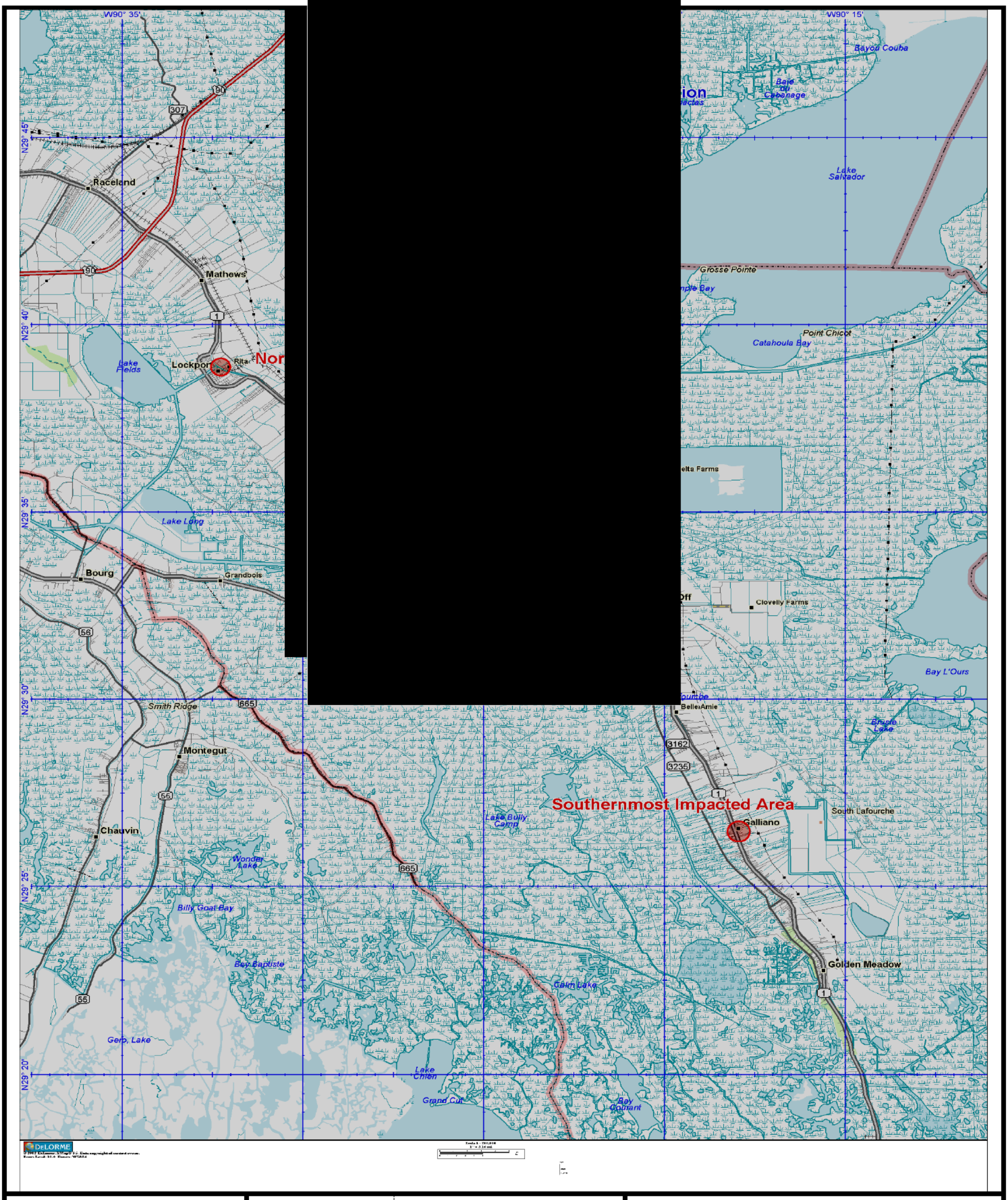


ES&H The Total Assurance Team · FOREFRONT Emergency Management	X	Potential Spill Site

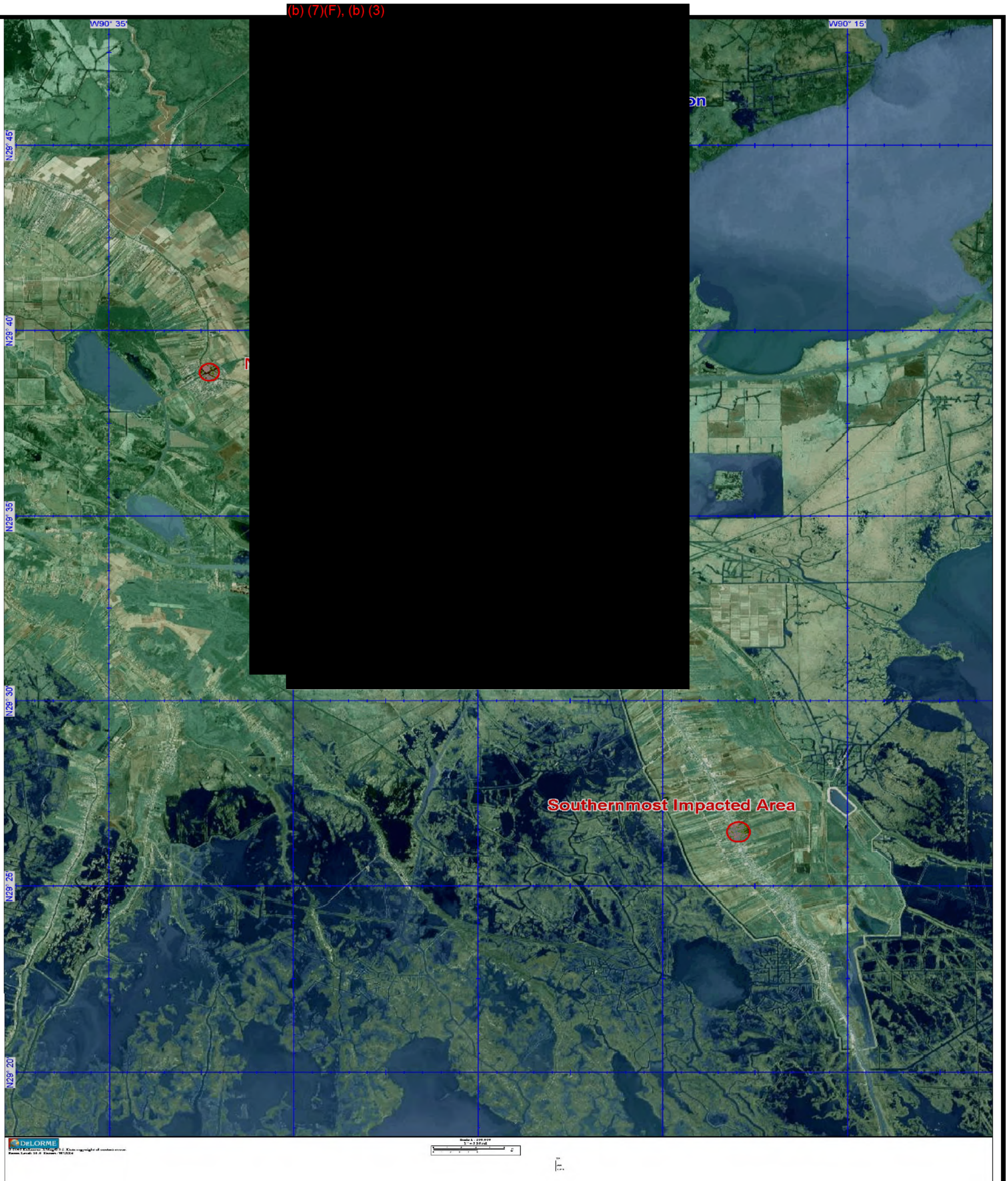
DISCOVERY PRODUCER SERVICES
DOT ONSHORE OIL PIPELINE
RESPONSE MANUAL

(b) (7)(F), (b) (3)



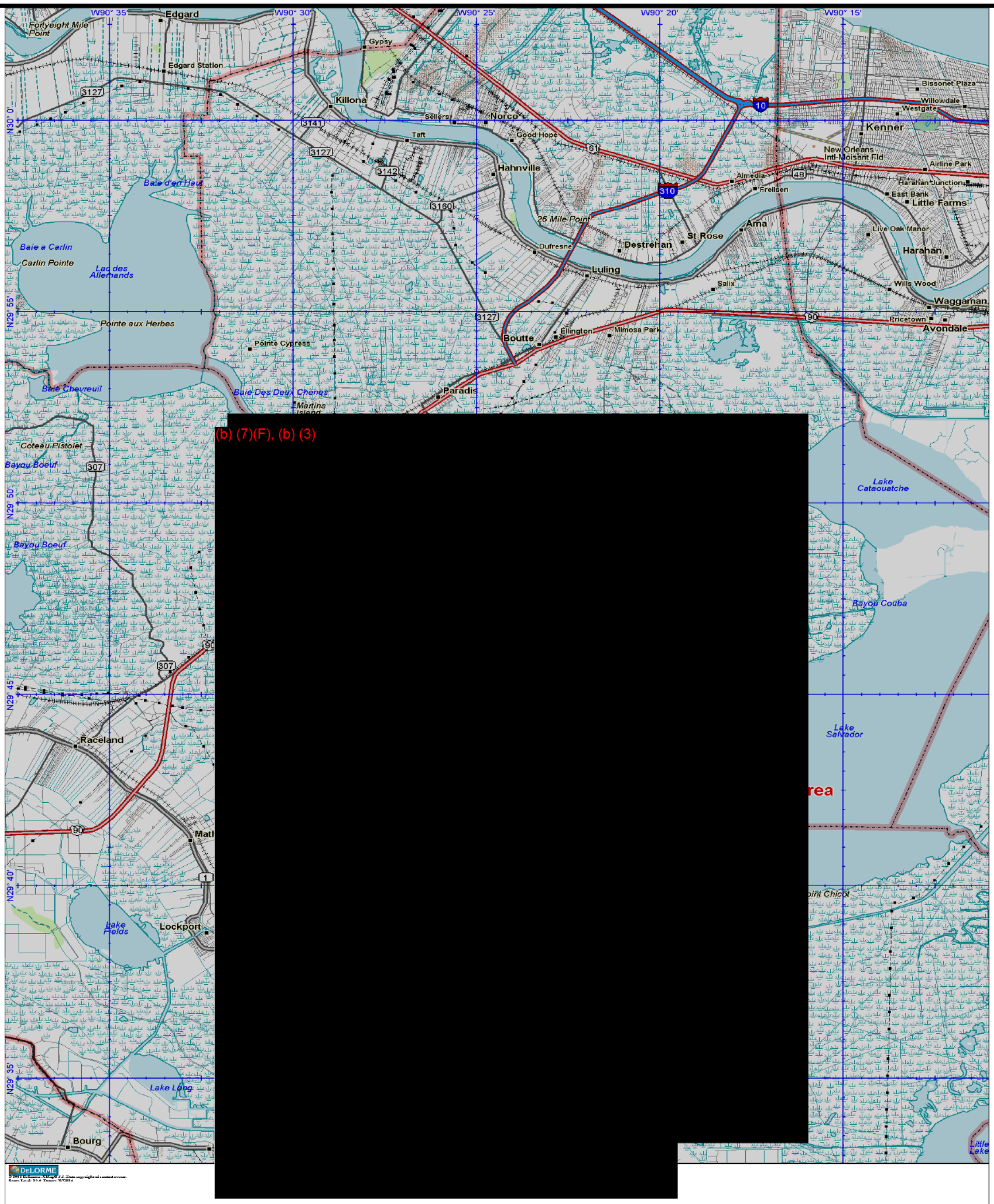
ES&H The Total Assurance Team / FOREFRONT Emergency Management	X	Potential Spill Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL

(b) (7)(F), (b) (3)



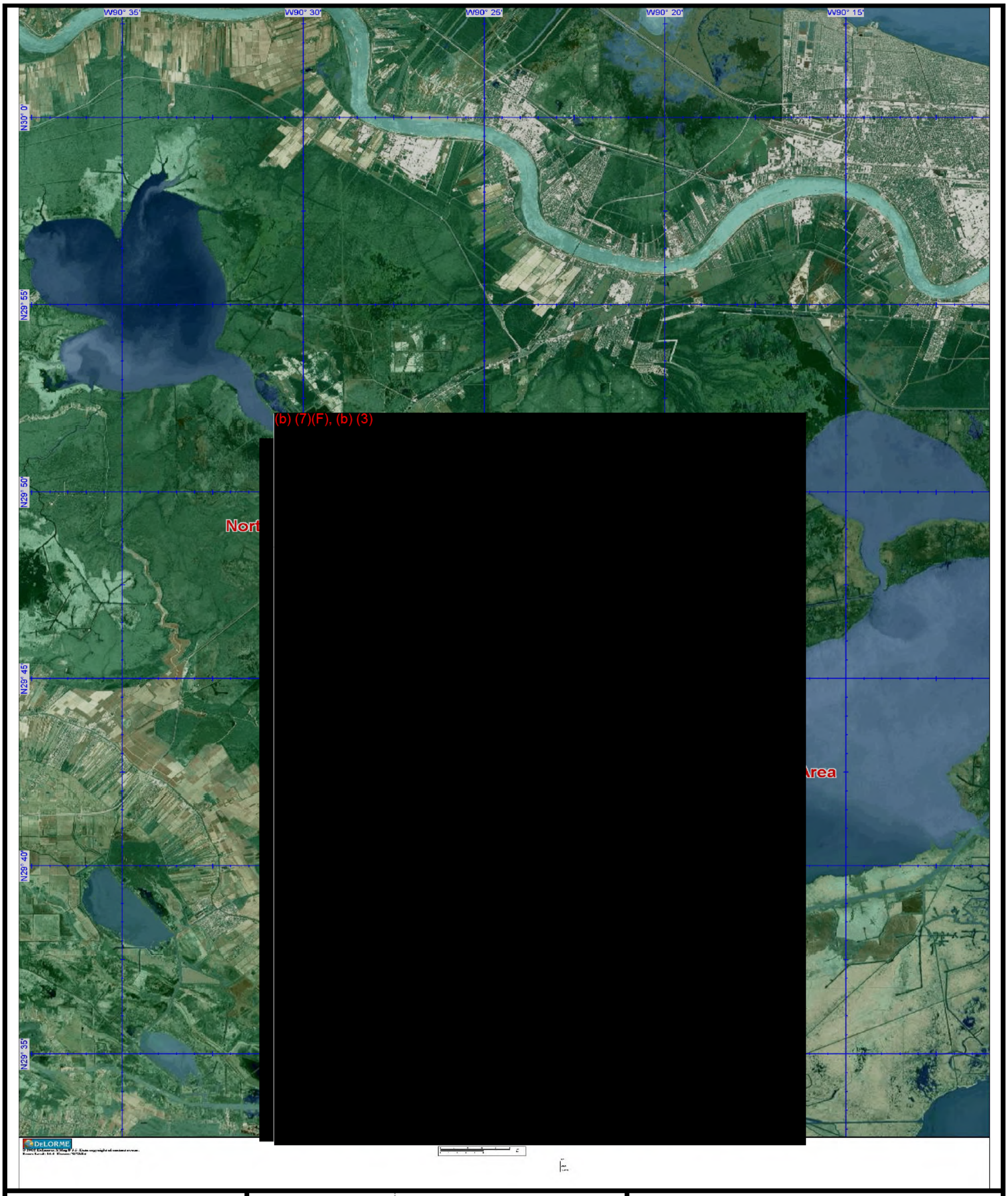
ES&H The Total Assurance Team. FOREFRONT Emergency Management	X	Potential Spill Site

DISCOVERY PRODUCER SERVICES
DOT ONSHORE OIL PIPELINE
RESPONSE MANUAL



(b) (7)(F), (b) (3)

ES&H The Total Assurance Team / FOREFRONT Emergency Management	X	Potential Spill Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL



ES&H The Total Assurance Team · FOREFRONT Emergency Management	X	Potential Spill Site

DISCOVERY PRODUCER SERVICES
DOT ONSHORE OIL PIPELINE
RESPONSE MANUAL

WORST CASE DISCHARGE INFORMATION

WORST CASE DISCHARGE INFORMATION

Formula: (MRT + MST) X MFR + LLD = WCD

MRT= (b) (7)(F), (b) (3)
MST=
MFR=
LLD=
WCD=

(b) (7)(F), (b) (3)

Drainage Calculation for Individual Line Segments

Formula: (Interior Diameter in inches)^2 / 1029.5 x Length in feet = Barrels
1 Mile= 5,280 feet

(b) (7)(F), (b) (3)

TOTAL LINE VOLUME

(b) (7)(F), (b) (3)

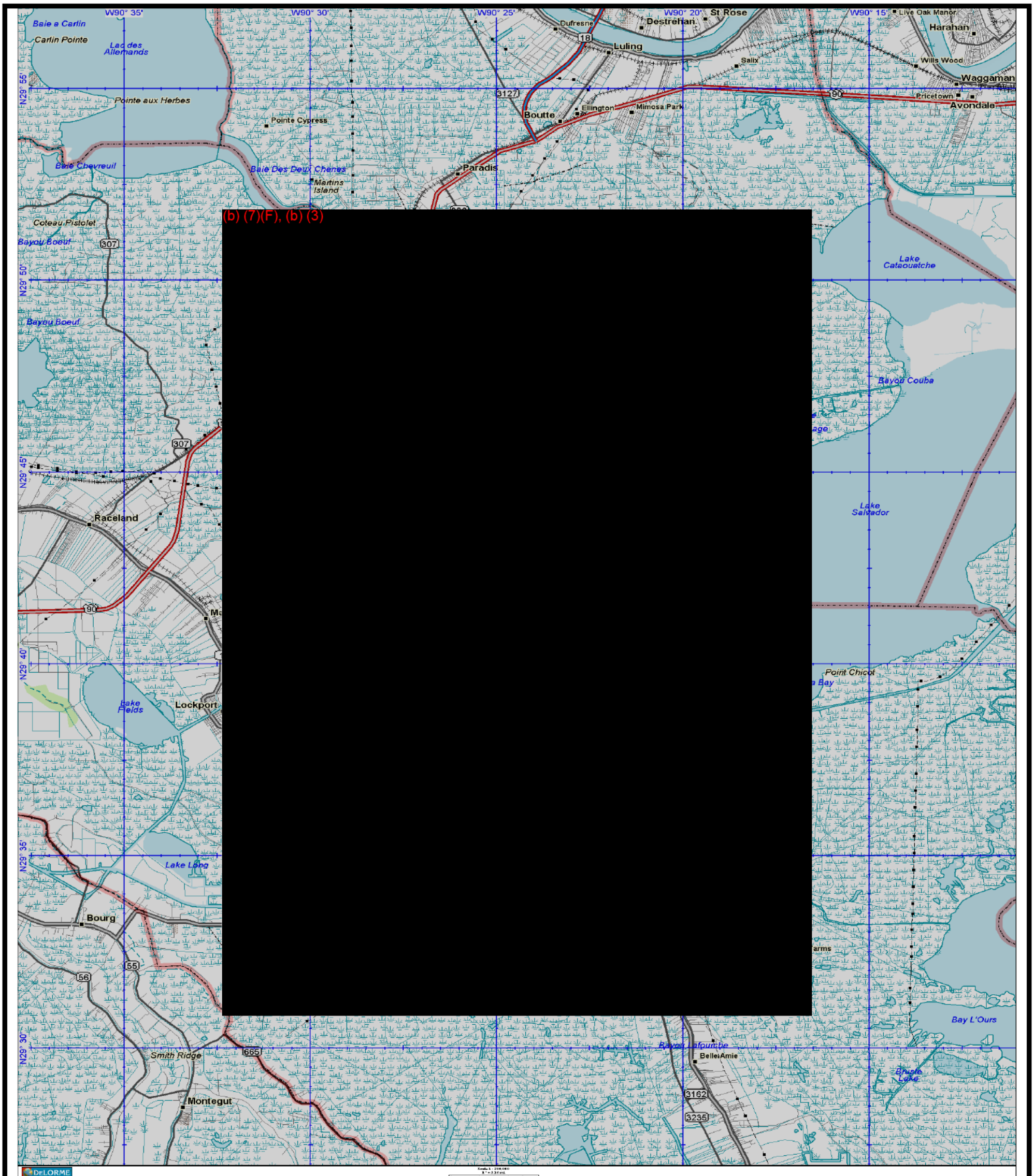
This facility does not contain a breakout tank. Also, this facility has not had any previous spills. Therefore, there are no additional worst case discharges to be calculated. According to the drainage calculation for the individual line segments, the worst case discharge is (b) (7)(F), (b) (3)

RESPONSE ZONE DESCRIPTION

RESPONSE ZONE DESCRIPTION
Response Zone 2 is identified by Discovery Producer Services as NGL. This zone contains one NGL pipeline running from the **Larose Processing Plant to the Paradis Plant.** This line runs approximately 22.93 miles in Louisiana through Lafourche and St. Charles Parishes. The geographic region this pipeline passes through contains areas of environmental and economic sensitivity. The general region is described in the maps and charts that are included on the following pages. The legend below identifies key pipeline segments and systems and corresponds to the overview map on the following page. More specific information related to environmental and economic areas of concern can be found later in the response plan.

KEY PIPELINE SEGMENT AREAS AND SYSTEMS	
	LAROSE PROCESSING PLANT
	(b) (7)(F), (b) (3) [redacted]
	PARADIS PLANT
#1	(b) (7)(F), (b) (3) [redacted]
#2	
Site A	
Site B	
Site C	
Site D	

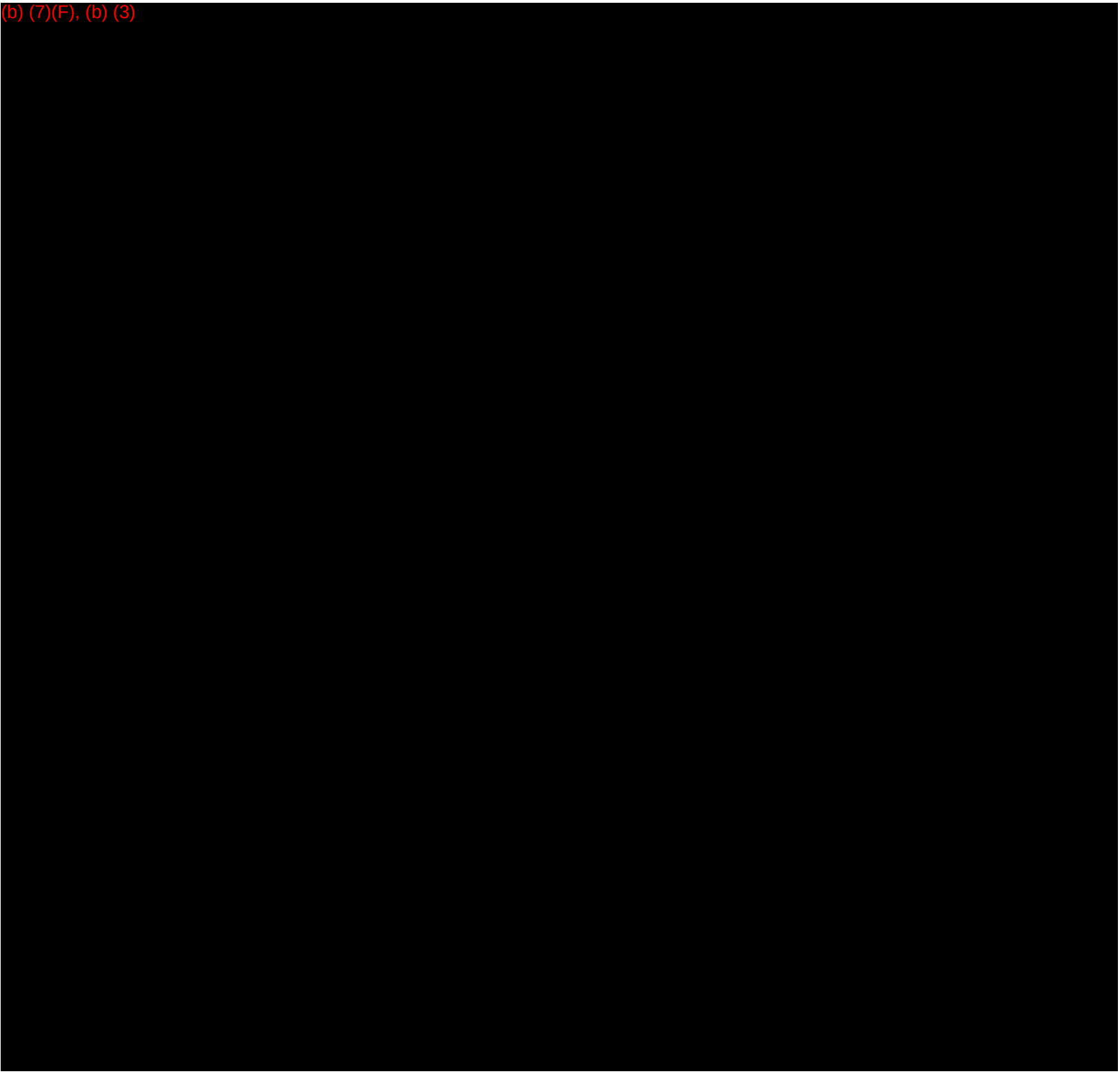
- **Please see the site map and text on the following pages for locations and more specific detail on these systems.**



(b) (7)(F), (b) (3)

ES&H The Total Assurance Team / FOREFRONT Emergency Management	Valve Site	**DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL**

ES&H The Total Assurance Team / FOREFRONT Emergency Management	Valve Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL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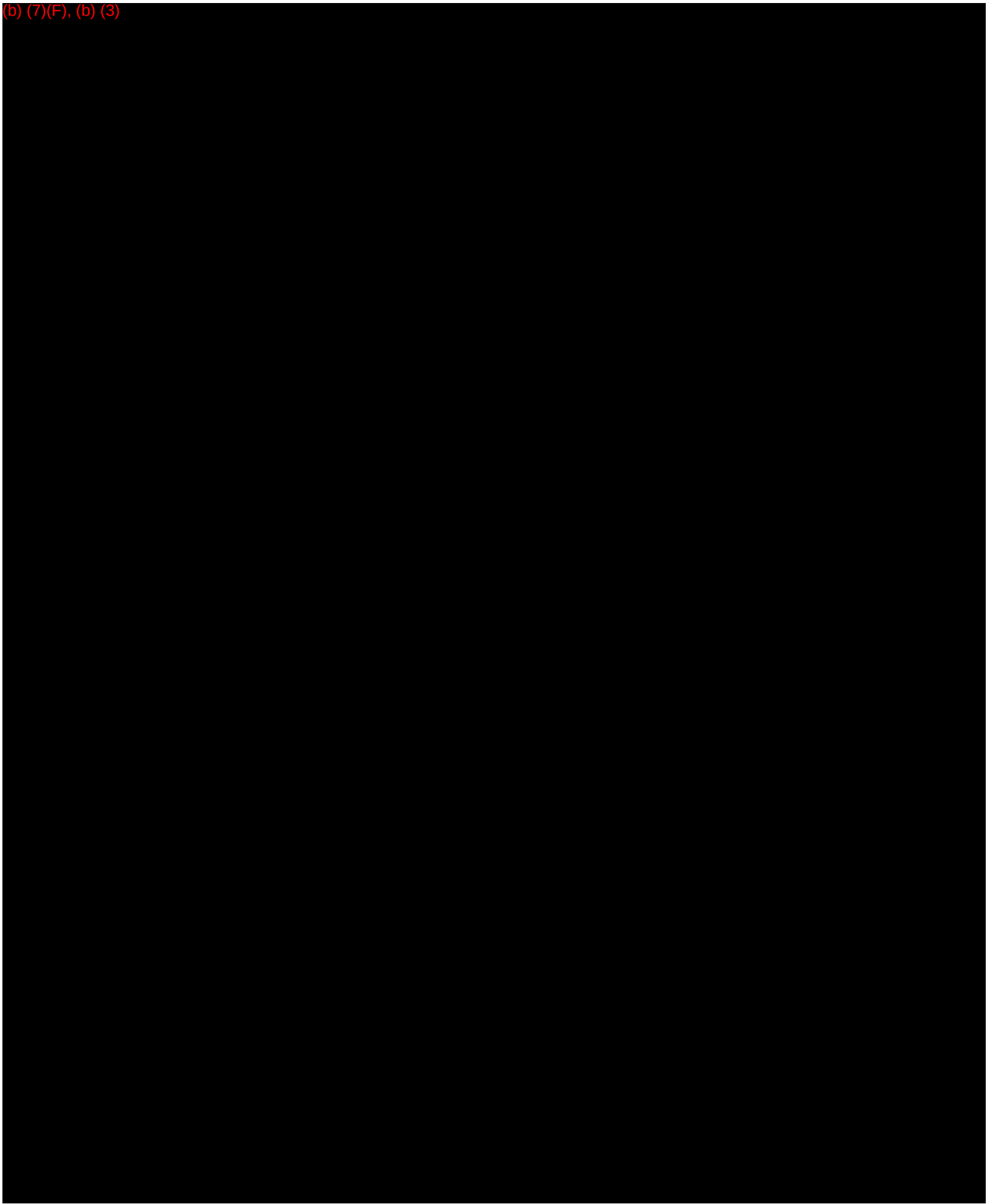
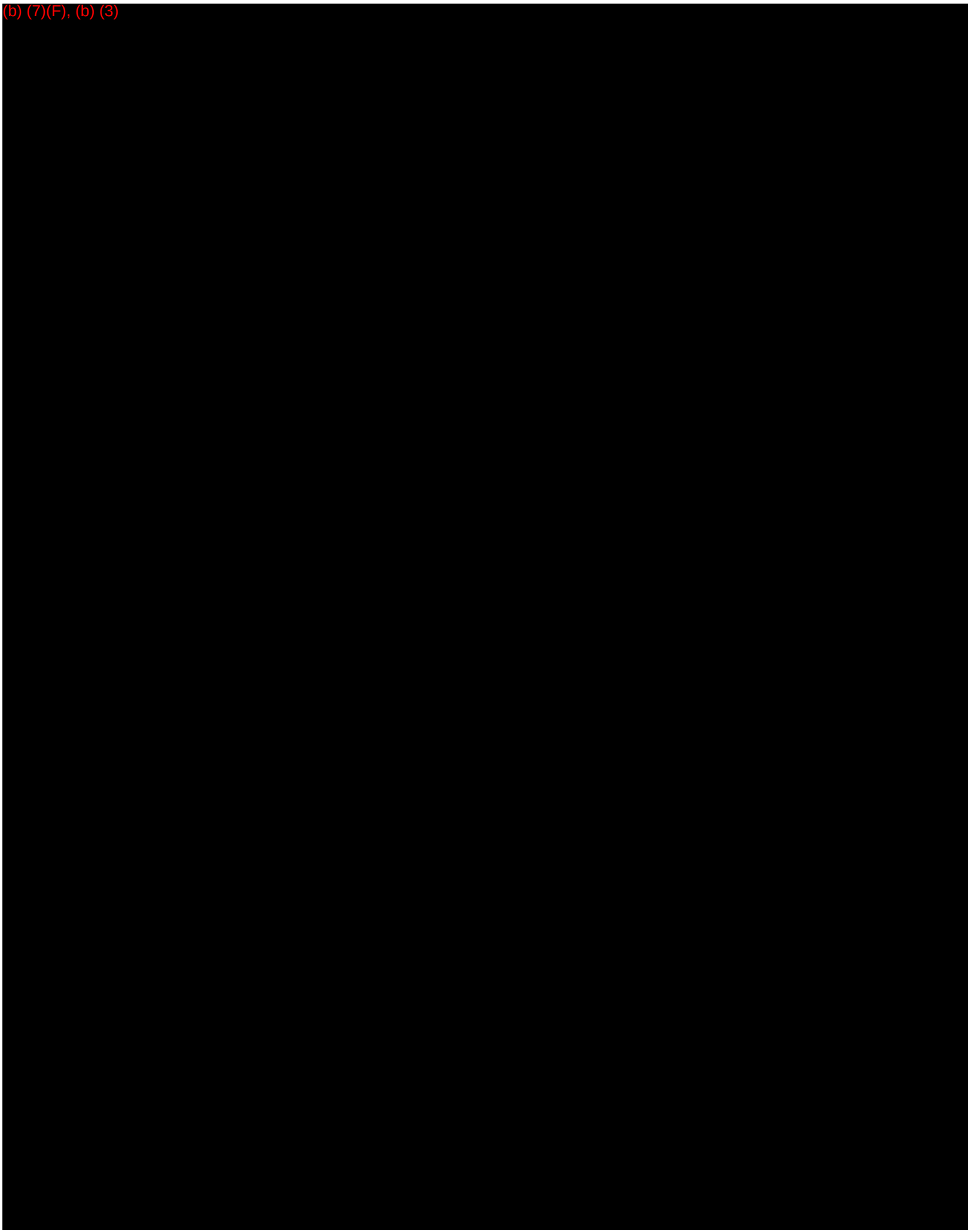
(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)

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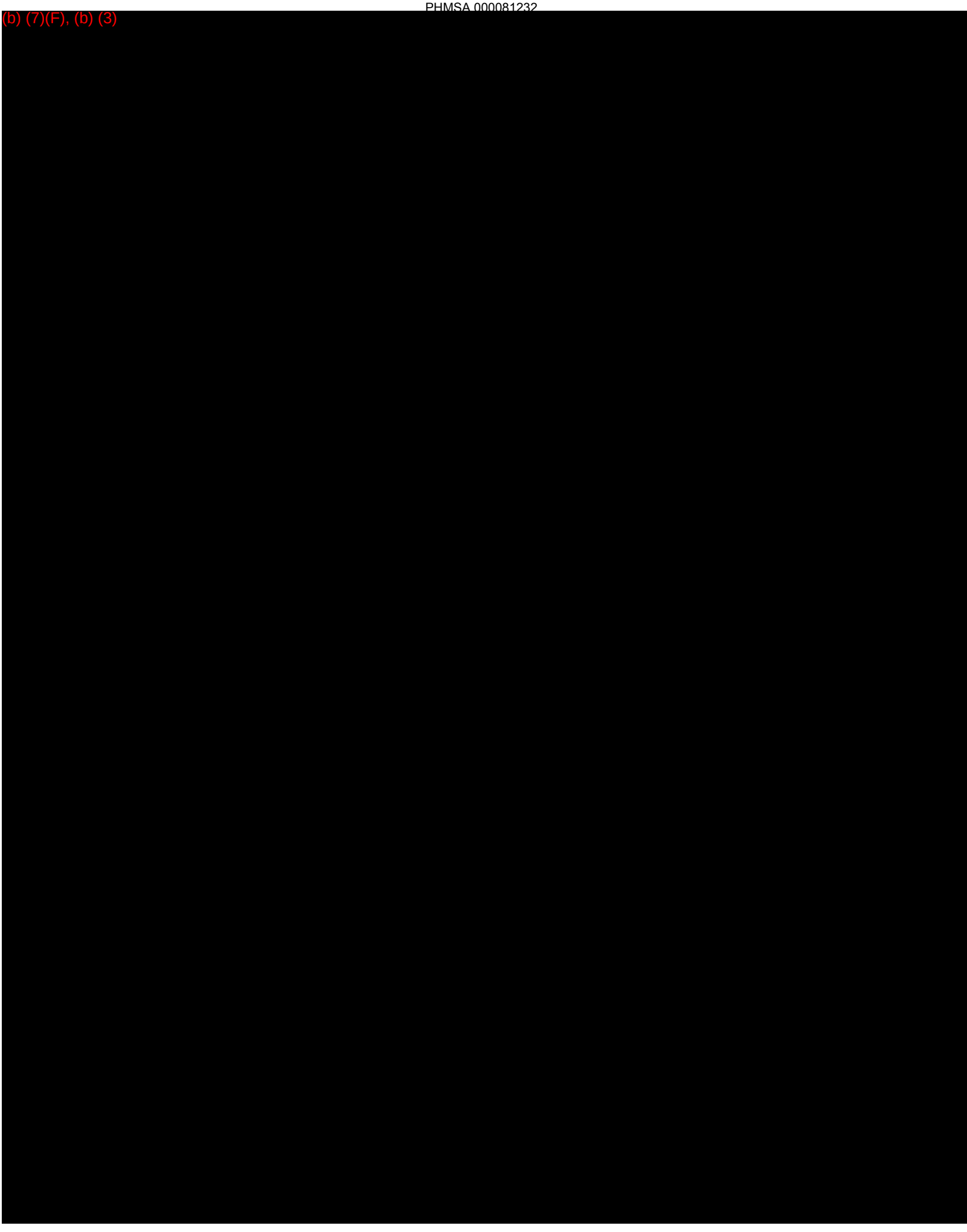
(b) (7)(F), (b) (3)



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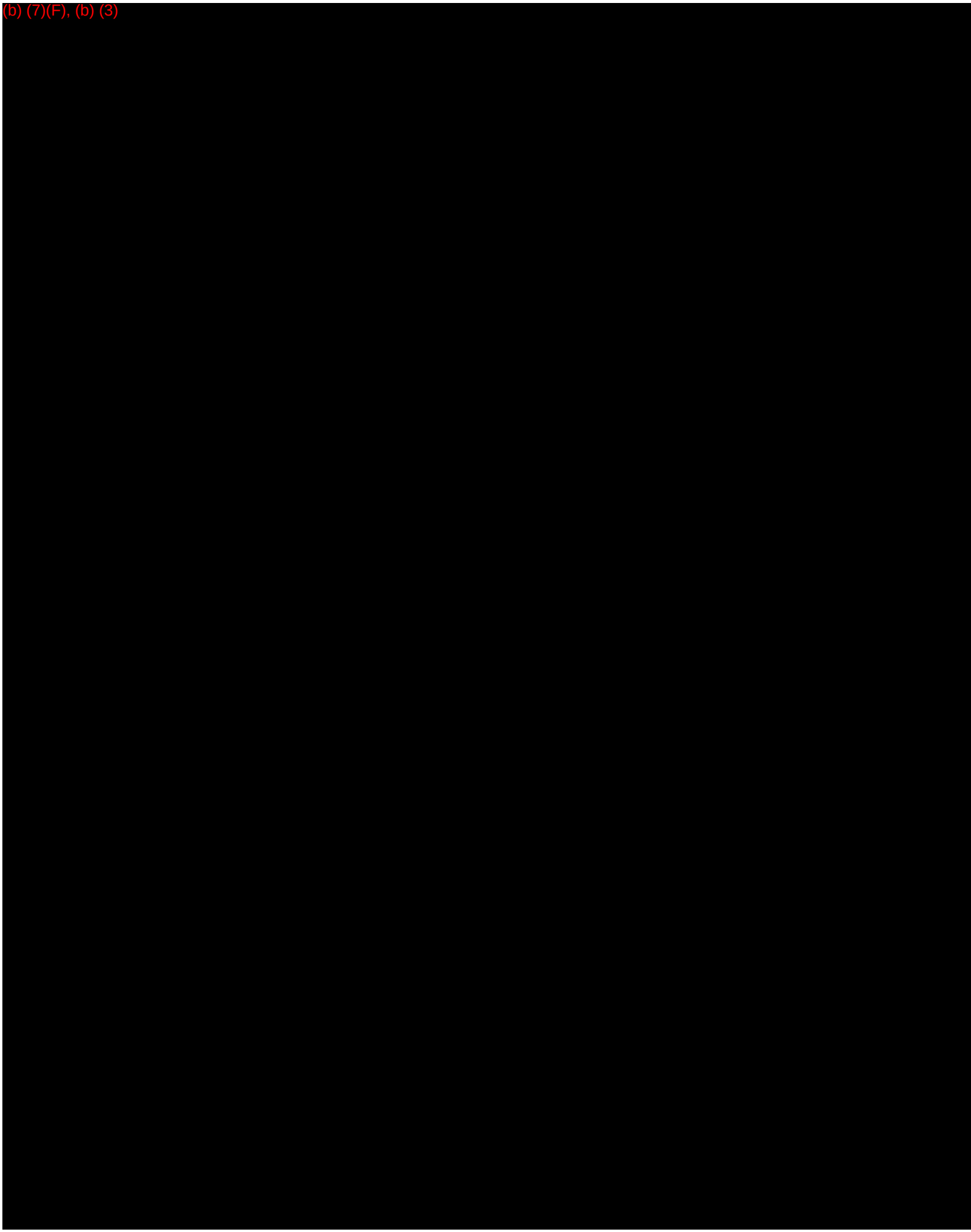
(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)



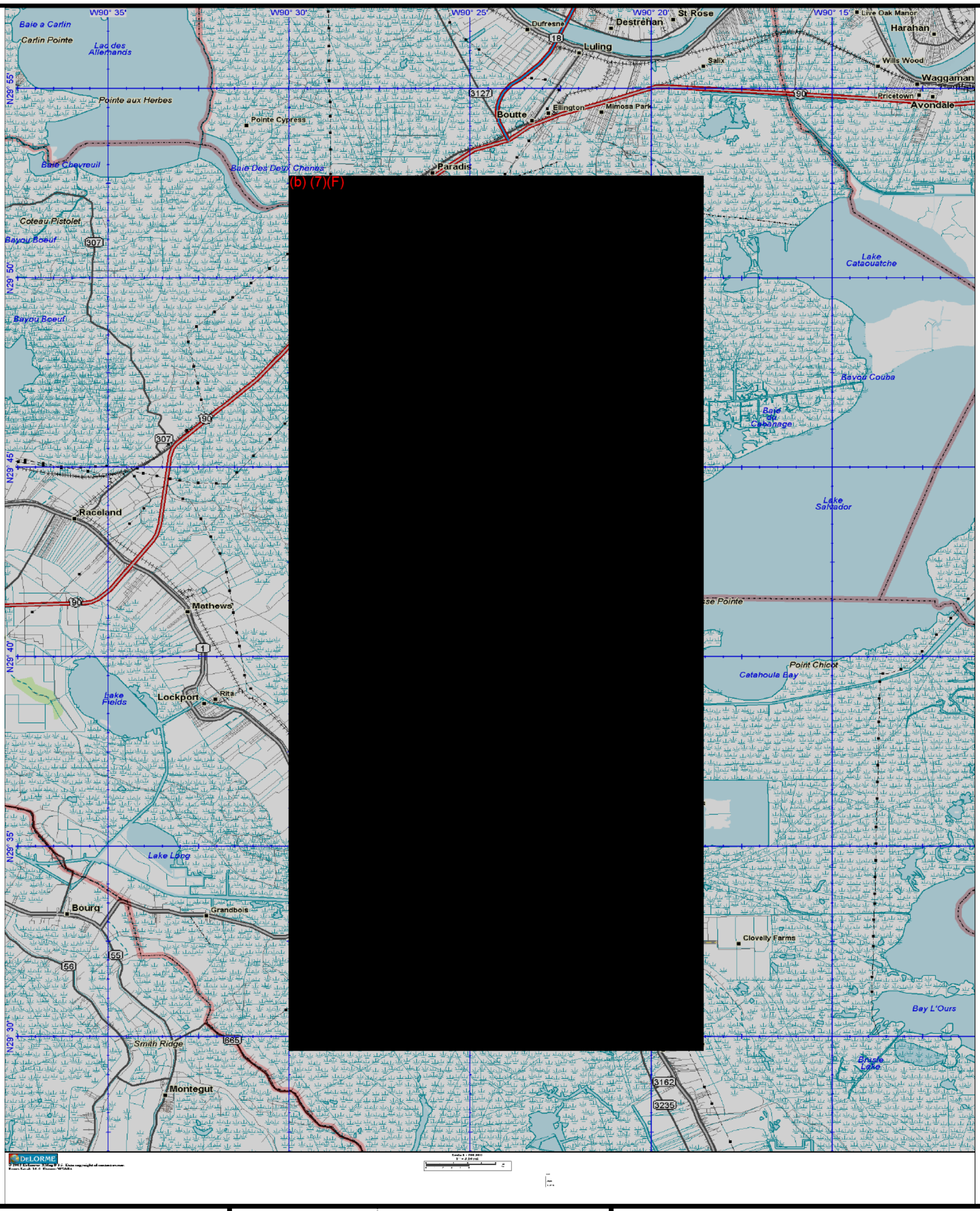

(b) (7)(F), (b) (3)

(b) (7)(F), (b) (3)

ENVIRONMENTAL SENSITIVITY

The NGL pipeline crosses several types of ecological areas as it spans from the **Larose Processing Plant to the Paradis Plant**. As the NGL pipeline traverses in a northerly direction, it crosses intermediate, brackish, and salt marsh wetlands. This pipeline section also includes multiple water crossings where it intersects Intracoastal Waterway, Bayou Lafourche, Bayou Des Allemands, and Bayou Gauche. These areas of concern have been identified for further review in this response zone. They are detailed individually in the following sections and are identified on the map on the following page.

PRIMARY ENVIRONMENTALLY SENSITIVE AREAS	
Site A	Intracoastal Waterway Canal
Site B	Bayou Lafourche
Site C	Bayou Des Allemands



	Valve Site
X	Sensitive Area / Water Crossing

ES&H The Total Assurance Team

FOREFRONT Emergency Management

DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL

ES&H The Total Assurance Team / FOREFRONT Emergency Management	Valve Site	DISCOVERY PRODUCER SERVICES DOT ONSHORE OIL PIPELINE RESPONSE MANUAL
	X Sensitive Area / Water Crossing	

SITE A- INTRACOASTAL WATERWAY CANAL

This site is a canal intersection running through a developed upland area located where the pipeline crosses the Intracoastal Waterway. The site coordinates of this area are (b [redacted]. The potentially impacted areas contain areas of both fresh and salt marshes.

The Environmental Sensitivity Index, produced by RPI International, Inc., describes the area as follows:

FRESH MARSH:

- Fresh Marshes are found in the interior portions of southern Louisiana along freshwater ponds or lakes.
- These marshes have various types of vegetative cover, including floating aquatic mats, vascular submerged vegetation, deciduous scrubs and shrubs, and evergreen scrubs and shrubs.
- Alligators, birds and mammals extensively use fresh marshes for feeding and breeding purposes.
- The freshwater area adjacent to this location contains many species of freshwater marine animals. These include Largemouth Bass (*Micropterus salmoides*), Blue Catfish (*Ictalarus furcatus*), Channel Catfish (*Ictalarus punctalus*), and Freshwater Drum (*Aplodinotus grunniens*). Additionally, this area contains several species of shellfish including Blue Crab (*Callinectes sapidus*), River Crayfish (*Procambarus clarkil*), White Shrimp (*Panaeus setiferus*), and Brackish-water Clam (*sp*).

SALT MARSH:

- Salt marshes are wet grasslands vegetated by salt-tolerant species. This habitat includes all non-fresh species.
- Alligators, birds and mammals extensively use salt marshes for feeding and breeding purposes.
- Species found in or near the salt marsh areas include several species of shellfish including Blue Crab (*Callinectes sapidus*), River Crayfish (*Procambarus clarkil*), White Shrimp (*Panaeus setiferus*), and Brackish-water Clam (*sp*) along with water fowl including American Coot (*Fulica americana*) and Ring-neck Duck (*Aythya caollaris*)
- Adjacent to these salt marsh areas, many species of marine fish populate the water areas. These species include Spotted Sea Trout (*Cynoscion nebulosus*), Red Drum (*Schaienops ocellatus*), Sheepshead (*Coryphaena hippurus*), and Sea Catfish (*Galeichtheyes felis*). Additionally, these areas contain several species of freshwater species described in other sections of this response plan.

PREDICTED NATURAL GASOLINE IMPACT:

- Small amounts of spilled Natural Gasoline are likely to contaminate the marsh fringe area only; natural removal by wave action in conjunction with passive remediation techniques can occur within months.
- Large spills will cover more area and can persist for decades.
- Natural Gasoline will adhere to marsh vegetation readily.
- Impacts to the marine environment will be minimized due to the lack of significant dispersion of spilled Natural Gasoline into the water table.

RECOMMENDED RESPONSE ACTIVITY:

- Marshes require the highest priority for shoreline protection
- Natural recovery is recommended when a small extent of marsh is affected or a small amount of Natural Gasoline impacts the marsh fringe.
- The preferred clean-up method is a combination of low pressure flushing, sorption, and vacuum pumping from boats.
- Any clean-up activities should be supervised closely to avoid excessive disturbances of the marsh surface or roots and should be conducted under the direction of federal and state agency representatives.

SITE A- INTRACOASTAL WATERWAY CANAL CONTINUED

IMPACT DISTANCES:

Based on tidal movement, wind direction, and other parameters, spills at this site have the potential for significant travel in multiple directions in the ICW. The potential areas of impact include all areas of shoreline of the ICW. To the southwest, the spill would be expected to reach the area of Bourg, LA at a distance of 15 miles. To the northeasterly direction, the spill would be expected to reach the Delta Farms Area at a distance of 8 miles. These impact areas are indicated on the map on the following page.

ICW Pipeline Crossing

SITE B – BAYOU LAFOURCHE

This site is a bayou crossing running through a developed upland area located where the pipeline crosses Bayou Lafourche. The site coordinates of this area are (b [redacted] The potentially impacted areas contain areas of developed upland, fresh marshes, and swamps.

The Environmental Sensitivity Index, produced by RPI International, Inc., describes the area as follows:

FRESH MARSH:

- Fresh Marshes are found in the interior portions of southern Louisiana along freshwater ponds or lakes.
- These marshes have various types of vegetative cover, including floating aquatic mats, vascular submerged vegetation, deciduous scrubs and shrubs, and evergreen scrubs and shrubs.
- Alligators, birds and mammals extensively use fresh marshes for feeding and breeding purposes.
- The freshwater area adjacent to this location contains many species of freshwater marine animals. These include Largemouth Bass (*Micropterus salmoides*), Blue Catfish (*Ictalarus furcatus*), Channel Catfish (*Ictalarus punctalus*), and Freshwater Drum (*Aplodinotus grunniens*). Additionally, this area contains several species of shellfish including Blue Crab (*Callinectes sapidus*), River Crayfish (*Procambarus clarkil*), White Shrimp (*Panaeus setiferus*), and Brackish-water Clam (*sp*).

PREDICTED NATURAL GASOLINE IMPACT:

- Small amounts of spilled Natural Gasoline are likely to contaminate the marsh fringe area only; natural removal by wave action in conjunction with passive remediation techniques can occur within months.
- Large spills will cover more area and can persist for decades.
- Natural Gasoline will adhere to marsh vegetation readily.
- Impacts to the marine environment will be minimized due to the lack of significant dispersion of spilled Natural Gasoline into the water table.

RECOMMENDED RESPONSE ACTIVITY:

- Marshes require the highest priority for shoreline protection
- Natural recovery is recommended when a small extent of marsh is affected or a small amount of Natural Gasoline impacts the marsh fringe.
- The preferred clean-up method is a combination of low pressure flushing, sorption, and vacuum pumping from boats.
- Any clean-up activities should be supervised closely to avoid excessive disturbances of the marsh surface or roots and should be conducted under the direction of federal and state agency representatives.

SWAMP:

- A freshwater wetland having varying water depths with vegetation ranging from shrubs and scrubs to poorly drained forested wetlands. Major vegetative types include Bald Cypress, Tupleo, and Black Willow.
- Alligators, many types of birds, and mammals use swamp areas during feeding and breeding activities.

SITE B – BAYOU LAFOURCHE CONTINUED

PREDICTED NATURAL GASOLINE IMPACT:

- Small amounts of spilled Natural Gasoline can spread throughout the swamp area to a limited extent.
- Large spills will cover more area and can persist since water flushing rates are very low.
- Natural Gasoline will adhere to swamp vegetation.
- During wet cycles, the roots of the swamp forest trees are not exposed; thus, a lesser degree of impact to the trees is expected. Any underbrush vegetation would be more severely impacted.

RECOMMENDED RESPONSE ACTIVITY:

- Passive remediation to no cleanup recommended in light to moderate accumulations. This will include placement of absorbent materials around the impacted area in order to remove the Natural Gasoline as it is slowly released.
- In larger accumulations, strategic booming methods may be highly effective in trapping accumulations of Natural Gasoline that can be reclaimed through the use of skimmers and vacuums.
- In all circumstances, consideration must be given to the impact response personnel and equipment will potentially have on the area they are attempting to mitigate. Minimization of the impact must be made by these resources as they are attempting to mitigate the incident. Any clean-up method used on an actual incident should be decided upon in conjunction with the Federal and State On-Scene Coordinators.

IMPACT DISTANCES:

The potential areas of impact include all areas of spoil bank/batcher of Bayou Lafourche. To the south, the spill would be expected to reach the area of Galliano, LA at a distance of 15 miles. To the north, the spill would be expected to reach the area of Lockport, LA a distance of 15 miles. These impact areas are indicated on the map on the following page.

Bayou LaFourche Pipe Crossing

SITE C- BAYOU DES ALLEMANDS / BAYOU GAUCHE

This site is a freshwater bayou area located where the pipeline crosses Bayou Des Allemands south of the town of Des Allemands, LA. The site coordinates of this area are (b [redacted] Additionally, this site is immediately south of Petit Lac Des Allemands (Mud Lake) and has the potential for contamination of the shallow water lake.

The Environmental Sensitivity Index, produced by RPI International, Inc., describes the area as follows:

FRESH MARSH/FRESH LAKE:

- Fresh Marshes are found in the interior portions of southern Louisiana along freshwater ponds or lakes.
- These marshes have various types of vegetative cover, including floating aquatic mats, vascular submerged vegetation, deciduous scrubs and shrubs, and evergreen scrubs and shrubs.
- Alligators, birds and mammals extensively use fresh marshes for feeding and breeding purposes.
- The freshwater lake area adjacent to this location contains many species of freshwater marine animals. These include Largemouth Bass (*Micropterus salmoides*), Blue Catfish (*Ictalarus furcatus*), Channel Catfish (*Ictalarus punctalus*), and Freshwater Drum (*Aplodinotus grunniens*). Additionally, this area contains several species of shellfish including Blue Crab (*Callinectes sapidus*), River Crayfish (*Procambarus clarkil*), White Shrimp (*Panaeus setiferus*), and Brackish-water Clam (*sp*).

PREDICTED NATURAL GASOLINE IMPACT:

- Small amounts of spilled Natural Gasoline are likely to contaminate the marsh fringe area only; natural removal by wave action in conjunction with passive remedial techniques can occur within months.
- Large spills will cover more area and can persist for decades.
- Natural Gasoline will adhere to marsh vegetation readily.
- Impacts to the marine environment will be minimized due to the lack of significant dispersion of spilled Natural Gasoline into the water table.

RECOMMENDED RESPONSE ACTIVITY:

- Marshes require the highest priority for shoreline protection
- Natural recovery is recommended when a small extent of marsh is affected or a small amount of Natural Gsoline impacts the marsh fringe.
- The preferred clean-up method is a combination of low pressure flushing, sorption, and vacuum pumping from boats.
- Any clean-up activities should be supervised closely to avoid excessive disturbances of the marsh surface or roots and should be conducted under the direction of federal and state agency representatives.

IMPACT DISTANCES:

Spills at this site have the potential for significant travel in multiple directions. Based on tidal movement and wind direction, spills at this location would be expected to travel north into Petit Lac Des Allemands via Bayou Des Allemands. Furthermore, spills at this site would be expected to travel south via Bayou Des Allemands to potentially include the easternmost banks of Lake Salvador. These impact areas are indicated on the map on the following page.

Bayou Des Allemands / Bayou Gauche

PRIMARY ECONOMICALLY SENSITIVE AREAS

The pipeline crosses the following major areas of economic sensitivity; however, due to the nature of the pipeline being buried, no impact is expected to these resources:

- Bourg-Larose HWY
- LA HWY 308
- LA HWY 1
- US HWY 90
- Bollinger Shipyards

WATER INTAKES POTENTIALLY AFFECTED BY SPILLS FROM THIS PIPELINE SEGMENT		
INTAKES	PHONE NUMBER	NEAREST CITYS
(b) (7)(F), (b) (3)		

NOTIFICATIONS PROCEDURES

I. The following table contains a list of the government agencies that have potential jurisdiction over an incident in the Discovery Producer Services Response Zone 2 - NGL:

AGENCY NAME	24- HOUR TELEPHONE #
National Response Center	800-424-8802
Louisiana State Police	225-925-6595
Louisiana Department of Environmental Quality	225-925-6595
Environmental Protection Agency	866-372-7745
US Coast Guard Sector New Orleans	504-365-2200
US Coast Guard MSU Morgan City	985-380-5320
US Coast Guard MSU Houma	985-850-6400
Louisiana Oil Spill Coordinators Office	Hotline: 225-200-1921 Office: 225-925-6606
Louisiana Department of Wildlife and Fisheries	225-765-2800
Office of Emergency Preparedness Lafourche Parish	985-537-7603
Office of Emergency Preparedness St. Charles Parish	985-783-5050

II. In the event of an incident, the operator or qualified individual will make the following notifications in the order given below.

Entity	Phone #	Status
Louisiana State Police	225-925-6595	As Required within 30 minutes
Lafourche Local Emergency Planning Committee St. Charles Local Emergency Planning Committee	985-537-7603/ 985-637-5195 985-783-5050	As Required within 30 minutes
Louisiana Department of Environmental Quality	225-925-6595	As Required within 30 minutes
National Response Center	800-424-8802	As Required
U.S.C.G. MSU Houma U.S.C.G. Sector New Orleans U.S.C.G. MSU Morgan City	985-850-6400 504-365-2200 985-380-5320	As Required
Louisiana Oil Spill Coordinators Office (LOSCO)	Hotline: 225-200-1921 Office: 225-925-6606	As Required
ES&H (Contracted OSRO)	877-437-2634	When clean-up is required
Internal Corporate personnel as given in the table below	As warranted by severity of incident	As Required
Louisiana Department of Natural Resources (DNR)	225-342-5540	As Required

III. In the event of an incident, the personnel discovering the spill shall notify

EMPLOYEE CONTACT LIST			
This pipeline is monitored and operated by control room personnel on a 24-Hour Basis. Any detection of abnormal operations will prompt a notification to the Q.I. or A.Q.I. notated below.			
NAME & TITLE	**WORK #**	**MOBILE #**	**HOME #**
Dale Fincher Pipeline Supervisor **Q.I.**	985-798-5907	(b) (6) [redacted]	

EMPLOYEE CONTACT LIST (CONTINUED)

Raymond Gonzales Pipeline COM (Onshore) **Q.I.**	985-798-5910	(b) (6)
Calbert Dufrene Manager of DPS Operations **Q.I.**	985-798-5925	
Kirk Lee Pipeline COM (Offshore) **Q.I.**	985-798-5906	
Darryl Benoit Operations Supervisor	985-798-5919	
Phil Roddy Maintenance Supervisor	985-798-5959	
Charles Folse Safety Representative	985-798-5918	
Jerry Knight Manager of Tech Services	985-798-5917	
James Adams Maintenance COM	985-798-5924	
Judy Dyson Lead FOA	985-798-5916	

Tulsa Gas Control Information

1-800-635-7400
1-918-574-9316

Control Room

Larose Control Room Larose Control Room Alternate #	985-798-5902 985-258-1649
Paradis Control Room Paradis Control Room Alternate #	985-758-4111 985-258-8333

IV. In the event of an incident, the following procedures will be used by the facility personnel to notify the Qualified Individual(s):

Step #	Procedure
1.	The employee discovering the incident will immediately notify the Shift supervisor at his facility.
2.	If the incident is a reportable quantity, the Shift supervisor will immediately contact the Qualified Individual for his region.
3.	The Qualified Individual shall be notified using the communication methods given in the table below.
4.	After the initial notifications, the Shift supervisor shall notify the Qualified Individual of any changes in the status of the incident as soon as possible given the circumstances.

V. In the event of an incident, the following methods of communication shall be used:

Priority	Method of Communication Used
Primary Method:	The primary method of communication used for all notifications will be intrinsically safe hand-held radios.
Secondary Method	The secondary method of communication will be via satellite telephone.

Initially, communications on the spill site will be provided by the intrinsically safe hand-held radios and the satellite phones by Discovery Producer Services. At the point where the Operations Section Chief determines it is necessary to acquire more or improved communications, he will instruct the Logistics Section Chief to acquire additional resources from the OSRO, ES&H. At the point, a Communication Resource Unit Leader will be established at the staging area and placed in charge of distribution of the communication equipment. The number of individual resources acquired will depend upon the nature of the incident. In the case of the worst case discharge scenarios for this pipeline typical packages would include:

- ES&H Consulting Services, Inc. – (15) Motorola hand-held radios.

The following procedures have been established in order to ensure proper communications are maintained between the field responders and the command post:

1. All zone supervisors will utilize (2) hand-held radios to ensure proper communications.
2. One radio shall be kept on Channel 1 for communications with the Command Post as an alternative to the primary method of cellular phone listed above, while the other radio will be kept on Channel 2 for communications with the Field Foreman.

All responders in the field will use only Channel 2 for communication, while the command post will communicate with the zone supervisors on Channel 1 as an alternative to the primary method of cellular phone and monitor Channel 2.

PROCEDURES TO ESTABLISH AND MAINTAIN COMMUNICATIONS DURING RESPONSE OPERATIONS

Once a spill event has occurred, the ES&H Logistics Section Chief will appoint a Communications Unit Leader as part of the logistics section of the ICS Structure. This individual will be tasked with establishing and maintaining effective communications throughout the necessary response period. As described by the NIMMS ICS System, this positions duties will include:

1. **Determining unit personnel needs** including personnel to check radios in and out and ensure proper maintenance or repair in off hours;
2. **Advise on communications capabilities/limitations** including regular briefings to the Logistics Section Chief;
3. **Prepare and Implement the Incident Radio Communications Plan (ICS 205)** including appropriate distribution to all personnel;
4. **Establish appropriate communications distribution and maintenance locations** including areas at or near the primary staging areas for response personnel;
5. **Recover Equipment.**

During a worst case discharge as described by this response plan, it is assumed that the Communication Unit Leader described above will be required to mobilize communications equipment from 1 or both of the contractors given in this section. Once those resources are acquired, the Communication Unit Leader will accomplish the following objectives in the order given below:

1. Set up a distribution center near the staging area for the appropriate distribution to response personnel including safety personnel, supervisors, foreman, and technicians working in isolated areas.
2. Conduct a pre-work briefing with response personnel in the proper operation and limitations of the communications equipment.
3. Distribute radios to ICS personnel as appropriate.
4. Develop ICS 205 - **Incident Radio Communications Plan** in order to establish communications protocols.
5. Oversee status and effectiveness of response communications in order to address deficiencies and anticipate communications problems.

VI. In the event of an incident, the following information shall, at a minimum, be given in the initial and any subsequent notifications given to all parties (please see the spill report form on the following page):

Information necessary for all notifications concerning any incident	
1.	Name of pipeline
2.	Time of discharge
3.	Location of discharge
4.	Name of product involved
5.	Reason for discharge
6.	Estimated volume of oil discharged
7.	Weather conditions on scene including wind conditions, sea conditions, tide conditions and cloud cover
8.	Actions taken or planned by persons on scene including information about any offsite protective actions
9.	Name and contact information for the responsible party
10.	Date/Time the incident was discovered
11.	Date and Time the incident was secured (if available)
12.	Information pertaining to any fires, injuries or fatalities if they apply to a given incident

SPILL DETECTION AND ON-SCENE SPILL MITIGATION PROCEDURES

I. In the event of an incident, the following methods would be used to initially detect an incident:

Method	Description
1.	Reports or inspections from company personnel; Company personnel routinely monitor pipeline gauges and/or pipeline pressure indicators to insure proper operating pressure is being maintained on the pipeline.
2.	Reports from the public or public officials.
3.	Periodic inspections of pipeline right-of-ways via air, water and land transportation.
4.	Reports from field personnel or a report from the control center.
5.	As a result of previous experience in dealing with a given condition.

ABNORMAL OPERATIONS THAT POSE A THREAT FOR A WORST CASE DISCHARGE	
OPERATION	**PROCEDURES TO MITIGATE OR ELIMINATE THREAT**
Unauthorized Dredging Operations in Pipeline Right-of-Way	All pipelines will be properly marked along the right-of-way to inform people working in the area of the existence of the pipeline. All dredging operations will be properly surveyed and identified by Discovery Producer Services personnel to ensure any dredging operations do not threaten the pipeline's integrity. Additionally, all pipelines operated by Discovery Producer Services are included in the Louisiana One Call checking program.
Catastrophic Weather Event (i.e. Hurricane)	Discovery Producer Services monitors regional weather forecast in order to be prepared for any predictable weather related event. When severe weather, such as a hurricane, is predicted, Discovery Producer Services personnel will monitor the event and determine the appropriate response in accordance with the provisions of the Discovery Producer Services Severe Weather Plan. In most cases the offshore suppliers of oil to the facility will shut-in production thereby terminating the flow of product during severe weather events.
(b) (7)(F), (b) (3) [redacted]	
Vessel Mooring in Pipeline Right-of-Way	All pipelines will be properly marked along the right-of-way to inform people working in the area of the existence of the pipeline. Furthermore, navigational aides are maintained by Discovery Producer Services in areas where large vessels frequent.

ABNORMAL OPERATIONS THAT POSE A THREAT FOR A WORST CASE DISCHARGE CONTINUED

Procedures for dealing with additional abnormal operations as described by 49 CFR Part 195.402(d) are included in the *Procedural Manual for Operations, Maintenance, and Emergencies* maintained by Discovery Producer Services. This procedural manual includes procedures for dealing with abnormal operations to include:

1. Responding to, investigating, and correcting the cause of:
   a. Unintended closure of valves or shutdowns
   b. Increase or decrease in pressure or flow rate outside normal operating limits
   c. Loss of communications
   d. Operation of any safety device
   e. Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property
2. Checking variation from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation.
3. Correcting variations from normal operation of pressure and flow equipment and controls.
4. Notifying responsible pipeline personnel when notice of an abnormal operation is received.
5. Periodically reviewing the response of pipeline personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

ABNORMAL OPERATIONS THAT POSE A THREAT FOR A WORST CASE DISCHARGE CONTINUED (AS GIVEN IN THE O & M MANUAL)

OPERATION	PROCEDURES TO MITIGATE OR ELIMINATE THREAT
Unintended Closure of Valves or Shutdowns	• Inspect the valve to determine the cause of the closure or shutdown; • Reset the valve if no problem is found; • If a problem is found, initiate appropriate repair procedures; • Notify the appropriate personnel to exchange necessary information regarding flow changes, pressures, etc. to other parties on the pipeline system as required; • Document the abnormal operations; and • Notify Operations when the condition has been remedied and that pipeline operations can resume.
Increase or Decrease in Pressure or Flow	• Contact the customer and/or supplier facilities connected to the pipeline system, analyze relevant data, and issue appropriate instructions; • Dispatch pipeline personnel to patrol the pipeline system, if no immediate reason

ABNORMAL OPERATIONS THAT POSE A THREAT FOR A WORST CASE DISCHARGE CONTINUED (AS GIVEN IN THE O & M MANUAL)	
OPERATION	**PROCEDURES TO MITIGATE OR ELIMINATE THREAT**
Rate Outside Normal Operating Limits	can be determined for the change in system operating parameters; • Monitor situation closely for a continued deviation from the normal; • Proceed with the shutdown in a safe, orderly manner if adjustments cannot be made to restore the flow or pressure to original conditions and a shutdown is required; • Maintain documentation in a suitable format.
Loss of Communications	• Inspect the telemetry device sensing the loss of communication; • If a problem is found at that device, initiate immediate repair procedures; • If no problem is found at the device, reset device and check receiving end; • If a problem is found at the receiving end, initiate immediate repair procedures; • Notify the appropriate personnel to exchange necessary information regarding flow changes, pressures, etc. to other parties on the pipeline system as required; • Notify Operations when the condition has been remedied; • If the problem is with the phone system, initiate a repair request with the local telephone company and switch to the alternate methods of communication described in this plan.
Operation of Any Safety Device	• Inspect the device to attempt to determine the cause of the device's abnormal operation; • Adjust, if possible, the operation to cause the device to return to its original setting or position; • Proceed with shutdown procedures in a safe, orderly manner if adjustments cannot restore the device to its original condition and a shutdown is required; • Notify operations management; • Notify other customers and/or suppliers connected to the pipeline system; and • Suitably document the event.
Malfunction, Deviation, or Error Causing Hazard	• Take appropriate steps to correct the problem; • Notify operations and management; • Notify customers; • Document the event.

II. In the event of an incident, the following procedures will be followed by the personnel on-scene to mitigate or prevent any discharge from the pipeline:

Priority #	Procedure
I.	The employee discovering the incident will immediately notify the pipeline supervisor or his designee at his facility.
II.	The pipeline supervisor or his designee will make an immediate assessment of the incident as observed or reported, and, in accordance with that assessment, will: A. Evacuate the immediate area and the area downwind of the spill; B. Eliminate sources of ignition; C. Keep all persons out of the danger area; D. Make notification to the appropriate Qualified Individual to begin all notifications. E. Take steps to secure the source of the spill if plausible and safe to do so; F. Direct initial containment procedures if feasible.
III.	The pipeline supervisor or his designee shall then contact the Qualified Individual to mobilize additional resources from the contracted Oil Spill Removal Organization if the situation warrants assistance.
IV.	The pipeline supervisor or his designee shall take any steps feasible in order to minimize any threat to the public health and safety and to reduce the severity of the incident. • Until confirmed otherwise, the spill environment must be presumed to be hazardous. That presumption remains until the characteristics of the spilled material have been determined and the area has been properly tested. • Proper personnel protective equipment shall be utilized prior to entering a spill site. • If the spill observer does not have data and equipment to make that determination, an immediate request for this specific need should be made.
V.	The pipeline supervisor or his designee shall function as the responsible Discovery Producer Services person-in-charge until relieved by a Qualified Individual who will assume the position on On-Scene Commander and take over the spill response effort.

III. In the event of an incident, the following equipment may be needed in response activities on land and navigable waters:

Possible Types Of Equipment Needed In Response Activities	
1.	Transfer hoses and connection equipment
2.	Portable pumps and ancillary equipment
3.	Facilities available to transport and receive oil from a leaking pipeline (please see response zone appendices)
4.	Oil Spill Removal Organization- ES&H, Inc. spill control and recovery equipment

IV. In the event of an incident, equipment for response activities is available on a 24-hour basis at the following locations:

Company Name	Location	24-hour Contact Information
ES&H The Total Assurance Team	Gulf Coast 1730 Coteau Rd. Houma, LA 70364	877-437-2634
Clean Gulf Associates	650 Poydras Street, Suite 1020 New Orleans, LA 70130	888-242-2007
AMPOL	Gulf Coast 401 West Admiral Doyle New Iberia, LA 70560	337-365-7847

- Please see the list of equipment available for use during an incident on the following pages of this section. The location of these resources are noted on the overview map in the Information summary section of this response plan.

V. In the event of an incident, personnel from the contracted Oil Spill Response Organizations will be responsible for the use of any response equipment mentioned in this response manual. Please see the following pages for a list of this equipment and its locations.

ES&H
The Total Assurance Team

Bossier City Response Office
101 Crown Court Place
Bossier City, LA 71112

Belle Chasse Response Office
2305 N. Concord Road
Belle Chasse, LA 70037

Dallas/Fort Worth Response Office
3418 Gilbert Road
Grand Prairie, TX 75050

Fourchon Response Office
106 17th Street
Fourchon, LA 70357

Golden Meadow Response Office
21148 Hwy 1
Golden Meadow, LA 70357

Houma Response Office
1730 Coteau Road
Houma, LA 70364

Houston Response Office
202 Preston Avenue
Pasadena, TX 77503

Lake Charles Response Office
4141 S. Beglis Parkway
Sulphur, LA 70663

Mobile Response Office
5400 A Willis Rd.
Theodore, AL 36582

Morgan City Response Office
3189 Highway 70
Morgan City, LA 70380

New Iberia Response Office
2917 Fairchild Drive
New Iberia, LA 70562

Consulting & Training Group
1730 Coteau Road
Houma, LA 70364

Consulting & Training Group
2345 Atascocita Road
Humble, TX 77346

Industrial Group
1085 Bert St.
LaPlace, LA 70068

June 16, 2014

Discovery Producer Services
Larose Gas Plant
Mr. Dale Fincher
1474 Highway 24
Larose, LA 70373

RE: Letter of Intent for Emergency Response Services & Resources

Dear Mr. Dale Fincher:

Environmental Safety and Health Consulting Services, Inc. (ES&H) is pleased to offer our emergency response services and resources to Discovery Producer Services. In the event of an environmental emergency at Larose Gas Plant, ES&H shall immediately respond with the appropriate resources twenty-four (24) hours per day, seven (7) days per week.

If for any reason ES&H resources are not immediately available, ES&H will subcontract the necessary resources and/or assign the work to be performed. All of our response facilities are staffed with 40-hour Hazwoper trained personnel that are experienced and knowledgeable in emergency response operations. All of our response equipment is properly maintained and deployed annually in accordance with the USCG PREP and OPA 90 guidelines. As per 33 CFR 154.1045 paragraph (c)(1) and (c)(2), all requirements regarding response times resources shall be met for Worst Case Discharge (WCD) events.

This Letter of Intent (LOI) shall confirm our intention to respond to all environmental emergencies with all of the necessary resources. Should you have any questions or comments regarding these provisions please feel free to contact me at (985) 851-5350 or by e-mail at klormand@esandh.com.

Certifying Official

Kevin J. Lormand
Vice President
Emergency Response / OSRO Services

ES&H
The Total Assurance Team

Bossier City Response Office
101 Crown Court Place
Bossier City, LA 71112

Belle Chasse Response Office
2305 N. Concord Road
Belle Chasse, LA 70037

Dallas/Fort Worth Response Office
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Grand Prairie, TX 75050

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Fourchon, LA 70357

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Golden Meadow, LA 70357

Houma Response Office
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Houma, LA 70364

Houston Response Office
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Pasadena, TX 77503

Lake Charles Response Office
4141 S. Beglis Parkway
Sulphur, LA 70663

Mobile Response Office
5400 A Willis Rd.
Theodore, AL 36582

Morgan City Response Office
3189 Highway 70
Morgan City, LA 70380

New Iberia Response Office
2917 Fairchild Drive
New Iberia, LA 70562

Consulting & Training Group
1730 Coteau Road
Houma, LA 70364

Consulting & Training Group
2345 Atascocita Road
Humble, TX 77346

Industrial Group
1085 Bert St.
LaPlace, LA 70068

January 13, 2014

Discovery Producer Services
Larose Gas Plant
Mr. Dale Fincher
1474 Highway 24
Larose, LA 70373

Reference: **Unannounced** OSRO Equipment Deployment PREP Certification for 2013

Dear Mr. Dale Fincher,

In accordance with 33 CFR 154.1055(a)(3) and the National Preparedness for Response Exercise Program (PREP), Environmental Safety and Health Consulting Services, Inc. (ES&H) hereby certifies that our response equipment was deployed and operated by ES&H personnel on the following dates and locations for 2013:

Date	Company Name	Location	Parish/County
1/13/2013	TPIC	Lake Hatch, LA	Terrebonne Parish
1/27/2013	Nature's Way	Vicksburg, MS	Warren County
2/13/2013	Stone Energy	Cocodrie, LA	Terrebonne Parish
3/12/2013	Settoon Towing	Empire, LA	Plaquemines Parish
3/30/2013	Shell Pipeline	Pasadena, TX	Harris County
4/17/2013	Settoon Towing	Lafitte, LA	Jefferson Parish
6/28/2013	USCG	Mobile, AL	Mobile County
9/26/2013	Linc Energy	Leeville, LA	Lafourche Parish
10/31/2013	Breaux Petroleum	Cocodrie, LA	Terrebonne Parish
11/6/2013	TPIC	Hackberry, LA	Cameron Parish
11/11/2013	Linc Energy	Hackberry, LA	Cameron Parish
12/11/2013	USCG	Mobile, AL	Mobile County

Objectives met: ES&H demonstrated the effective ability to deploy and operate its equipment. In every deployment, a minimum of 1,000 feet of containment boom and one skimmer were deployed.

All ES&H personnel that took part in each equipment deployment received the necessary training to safely and effectively respond to an oil spill. A record of this training is on file and available upon request.

In accordance with federal law, please retain this document for at least three years.

Certifying Official

Kevin J. Lormand

Kevin J. Lormand
Vice President, Eastern Region
Emergency Response / OSRO Services

ES&H
The Total Assurance Team

Bossier City Response Office
101 Crown Court Place
Bossier City, LA 71112

Belle Chasse Response Office
2305 N. Concord Road
Belle Chasse, LA 70037

Dallas/Fort Worth Response Office
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Grand Prairie, TX 75050

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Golden Meadow, LA 70357

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Houma, LA 70364

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Pasadena, TX 77503

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Morgan City, LA 70380

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New Iberia, LA 70562

Consulting & Training Group
1730 Coteau Road
Houma, LA 70364

Consulting & Training Group
2345 Atascocita Road
Humble, TX 77346

Industrial Group
1085 Bert St.
LaPlace, LA 70068

February 4, 2013

Discovery Producer Services
Larose Gas Plant
Mr. Dale Fincher
1474 Highway 24
Larose, LA 70373

Reference: **Unannounced** OSRO Equipment Deployment PREP Certification for 2012

Dear Mr. Dale Fincher,

In accordance with 33 CFR 154.1055(a)(3) and the National Preparedness for Response Exercise Program (PREP), Environmental Safety and Health Consulting Services, Inc. (ES&H) hereby certifies that our response equipment was deployed and operated by ES&H personnel on the following dates and locations for 2012:

Date	Company Name	Location	Parish/County
1/23/2012	Austin Energy	Sector Galveston/Houston	Travis County
2/17/2012	Settoon Towing	Sector New Orleans	St. John the Baptist Parish
5/15/2012	ES&H Consulting Services	Sector Corpus Christi	Nueces County
8/21/2012	ES&H Consulting Services	Sector Mobile	Mobile County
9/17/2012	Weston Solutions	Sector Galveston/Houston	Tarrant County
10/1/2012	Motiva Enterprises	Sector New Orleans	St. John the Baptist Parish
10/17/2012	ES&H Consulting Services	Sector Corpus Christi	Nueces County
12/31/2012	ES&H Consulting Services	Sector Mobile	Mobile County

Objectives met: ES&H demonstrated the effective ability to deploy and operate its equipment. In every deployment, a minimum of 1,000 feet of containment boom and one skimmer were deployed.

All ES&H personnel that took part in each equipment deployment received the necessary training to safely and effectively respond to an oil spill. A record of this training is on file and available upon request.

In accordance with federal law, please retain this document for at least three years.

Certifying Official

Kevin J. Lormand
Vice President, Eastern Region
Emergency Response / OSRO Services

ES&H
The Total Assurance Team

Bossier City Response Office
101 Crown Court Place
Bossier City, LA 71112

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Belle Chasse, LA 70037

Dallas/Fort Worth Response Office
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Grand Prairie, TX 75050

Fourchon Response Office
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Fourchon, LA 70357

Golden Meadow Response Office
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Golden Meadow, LA 70357

Houma Response Office
1730 Coteau Road
Houma, LA 70364

Houston Response Office
202 Preston Avenue
Pasadena, TX 77503

Lake Charles Response Office
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Sulphur, LA 70663

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Theodore, AL 36582

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Morgan City, LA 70380

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Houma, LA 70364

Consulting & Training Group
2345 Atascocita Road
Humble, TX 77346

Industrial Group
1085 Bert St.
LaPlace, LA 70068

June 12, 2012

Discovery Producer Services
Larose Gas Plant
Mr. Dale Fincher
1474 Highway 24
Larose, LA 70373

Reference: **Unannounced** OSRO Equipment Deployment PREP Certification for 2009

Dear Mr. Dale Fincher:

In accordance with 33 CFR 154.1055(a)(3) and the National Preparedness for Response Exercise Program (PREP), Environmental Safety and Health Consulting Services, Inc. (ES&H) hereby certifies that our response equipment was deployed and operated by ES&H personnel on the following dates and locations for 2011:

Date	Company Name	Location	Parish/County	Job Number
1/27/2011	Chevron Venice	Sector New Orleans	Plaquemines Parish	01-124-11-09
2/14/2011	Maritech	Sector New Orleans	Lafourche Parish	02-092-11-09
3/24/2011	USCG	Sector New Orleans	Lafourche Parish	03-137-11-05
3/24/2011	Anglo Suissie	Sector New Orleans	Lafourche Parish	03-165-11-05
6/9/2011	USCG	Sector New Orleans	Plaquemines Parish	06-053-11-09
6/26/2011	Swift Energy	Sector New Orleans	Plaquemines Parish	06-170-11-09
7/9/2011	Sunland Construction	Sector Mobile	Harrison County	06-153-11-07
8/4/2011	Gulf Coast Asphalt Company	Sector Mobile	Mobile County	09-035-11-07
9/4/2011	Moncla Wells	Sector New Orleans	St. Mary Parish	09-033-11-04
12/22/2011	Environmental Consulting Services, Inc.	Sector Corpus Christi	Nueces County	12-001A-11-06
12/30 /2011	Environmental Consulting Services, Inc.	Sector Houston/Galveston	Harris County	12-001B-11-06

Objectives met: ES&H demonstrated the effective ability to deploy and operate its equipment. In every deployment, a minimum of 1,000 feet of containment boom and one skimmer were deployed.

All ES&H personnel that took part in each equipment deployment received the necessary training to safely and effectively respond to an oil spill. A record of this training is on file and available upon request.

In accordance with federal law, please retain this document for at least three years.

Certifying Official

Kevin J. Lormand

Kevin J. Lormand
Vice President, Eastern Region
Emergency Response / OSRO Services

RESPONSE RESOURCES
LOCATION GUIDE

24-HOUR EMERGENCY HOTLINE
1-877-4ESANDH

JULY 2012

HOUMA*FOURCHON*GOLDEN MEADOW*MORGAN CITY
BELLE CHASSE*LAPLACE*MOBILE*LAFAYETTE
LAKE CHARLES*BOSSIER CITY*HOUSTON*DALLAS-FT. WORTH

Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
1	6" CONTAINMENT BOOM	300'			200'			200'		200'			
2	10" CONTAINMENT BOOM	1,000'		500'	1,000'	1,000'		1,500'	500'		2,000'		2,000'
3	18" CONTAINMENT BOOM	32,000'	1,000'	10,000'	1,000'	16,000'	6,000'	6,000'	13,000'	42,000'	1,500	30,000'	5,300'
4	24" CONTAINMENT BOOM	300'				500'							
5	OIL SPILL RESPONSE TRAILER	3	1	1	1	3	1	1	1	2	1	1	2
6	16' CONTAINMENT BOOM TLR.	5	1	1	2	2	1	1	1		1	1	1
7	24' CONTAINMENT BOOM TLR.									2	1	1	1
8	30' CONTAINMENT BOOM TLR.					1							
9	HAZ-MAT RESPONSE TRAILER						1		1	1	1	1	1
10	INDUSTRIAL SERVICES TRAILER				1	1	3		1			1	1
11	INDUSTRIAL CLEANING TLR.	4	1	1		1	2		1		2	1	1
12	COMMUNICATIONS TRAILER	1											
13	MOBILE COMMAND POST TLR.	2				1	1			1			
14	35' PPE/Consumables TLR.									1			
15	48' CONTAINMENT BOOM TLR.	5		2		2	1	1	2	6	1	4	1
16	48' PPE TRAILER	1		1			2	1		1			1
17	48' DECON TRAILER	1											
18	48' CONSUMABLES TRAILER	7		1			1						
19	48' ABSORBENT MATERIALS TLR.	5		1		1	7	1	1	2	1		
20	48' FLATBED TRAILER	2											
21	RESPONSE VEHICLES (P/U TRUCKS)	17		3	3	7	20	3	4	6	5	6	12
22	TRACTOR TRUCK	10				3	10			1	1	3	3
23	70/80 BBL VACUUM TRUCK	4		1		1	3	1		1	1	2	2
24	130 BBL VACUUM TRAILER	8		1		3				1	1	2	1
25	S/S CHEMICAL TRANSPORT TLR.												1
26	FLATBED DRUM TRUCK	1					2			1			
27	BOBTAIL ROLL-OFF TRUCK	2					5			1	1		1
28	SINGLE RAIL ROLL OFF BOX TLR.	1					1				1	1	2
29	DOUBLE RAIL ROLL OFF BOX TLR.	2				1	9						
30													

Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
31	LORI BRUSH SKIMMER			2									
32	JBF SKIMMER									1			
33	MARCO SKIMMER	2				1				1		1	
34	SIDEWINDER BELT SKIMMER									2			
35	GOO GOBBLER SKIMMER	1		1			1	1					
36	MOBILE DRUM SKIMMER BARGE	2											
37	SMALL DRUM SKIMMER				1								1
38	MEDIUM DRUM SKIMMER	7	1	3	2	2	2	1	3	6		2	2
39	LARGE DRUM SKIMMER	5		1	1	1	1	1	2	2	2	1	1
40	SMALL SKIM-PAK SKIMMER	4							2	1			
41	MEDIUM SKIM-PAK SKIMMER	2				1							
42	LARGE SKIM-PAK SKIMMER	9		2	1	3	2	2	2	3	1	2	2
43	MANTA RAY SKIMMER					1							
44	ROPE MOP SKIMMER	2											
45	30 BBL OIL STORAGE BARGE	2											
46	225 BBL OIL STORAGE BARGE	2											
47	12' - 14' RESPONSE BOAT	36	2	2	3	4		2	3	3	1		1
48	16' RESPONSE BOAT				1	1			1			4	
49	18' - 21' RESPONSE BOAT	2	1	1	1	1			1	1			
50	22' - 25' RESPONSE BOAT	5			1	1		1	1	1	1		
51	26' - 29' RESPONSE BOAT	5		1	1	2		1	1	2		3	1
52	30' - 33' RESPONSE BOAT												
53	34' - 37' RESPONSE BOAT												
54	38' - 40' RESPONSE BOAT												
55	22' - 25' BARGE BOAT									1			
56	26' - 30' BARGE BOAT	2								1			
57	31' - 35' BARGE BOAT												
58	36' - 39' BARGE BOAT												
59	40' - 45' BARGE BOAT	2	1	2									

Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
60	PERSONNEL VAN	3											
61	30 PASSENGER BUS	1											
62	4 x 4 ATV	2							1	2			
63	UTV/RTV	2		2			1			2	1		2
64	25 - 40 HP TRACTOR	1							1				
65	TRITON VACUUM UNIT						4						1
66	PORTABLE MINI-VAC	2		1						1			
67	DRUM HEAD VACUUM UNIT										3	2	4
68	MERCURY VACUUM UNIT						3				1	1	1
69	25 CU. YD. VACUUM BOX	2					4				1		3
70	20 - 25 CU. YD. ROLL OFF BOX	45					5			5	12		20
71	250 BBL FRAC TANK												1
72	1" DIAPHRAGM PUMP	1			1	2	3		1	2	2	1	3
73	1" CHEMICAL TRANSFER PUMP					1	1		1	1	2	1	3
74	2" DIAPHRAGM PUMP	24	2	4	6	2	10	3	5	5	3	4	5
75	2" CHEMICAL TRANSFER PUMP					1	2		1	2	1	1	1
76	3" DIAPHRAGM PUMP	9				1	11					8	2
77	2" CENTRIFUGAL PUMP	50	2	6	5	6	6	3	10	12	2	3	2
78	3" CENTRIFUGAL PUMP						3			1			
79	5 kW GENERATOR	12	1	2	3	7	1	1	3	4	2	3	6
80	15 kW GENERATOR	1											
81	10 CFM AIR COMPRESSOR	20	1	4	4	7	2	2	4	8	2	3	4
82	185 CFM AIR COMPRESSOR	1							1		2	1	3
83	375 CFM AIR COMPRESSOR						3						1
84	1500 PSI PRESSURE WASHER	6	1	1	1		1	1	1	2			
85	3000 PSI PRESSURE WASHER				1	2	3	1	2			1	
86	4000 PSI STEAM CLEANER	4		1			1		1	1	1	1	1
87	BOBCAT SKID STEER LOADER										1		1
88	LIGHT TOWER	4	2	2			6			2	2	2	2
89													

Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
90	4 GAS AIR MONITORING INSTR.	7		2	2	2	9	1	2	3	2	1	2
91	CMS AIR MONITORING INSTR.	2		1	1	2	1	1	1	2	1		
92	PID/FID	1										1	
93	4 GAS PID + VOC					1					1		2
94	CHEMICAL SPECIFIC PID										1		1
95	NORM SURVEY INSTRUMENT	2			2	2			2	2	2		2
96	SCBA						4		4	4	4	4	4
97	SCBA SPARE BOTTLES						4		4	4	8	8	8
98	TRIPOD/WINCH RETRIEVAL SYSTEM					1					1	3	1
99	COPPUS BLOWERS	1				1	6		2	2	2	4	2
100	SATELLITE PHONE	6			1	2			1	1			
101													
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Response Equipment by Location

HMA - Houma FCHN - Fourchon GM - Golden Meadow MCY - Morgan City BC - Belle Chasse LP - LaPlace M-Mobile
LAF - Lafayette LC - Lake Charles BOS - Bossier City HST - Houston DFW - Dallas/Ft. Worth

ITEM	EQUIPMENT DESCRIPTION	HMA	FCHN	GM	MCY	BC	LP	M	LAF	LC	BOS	HST	DFW
120	OIL ABSORBENT PADS	750	50	100	125	200	500	300	250	500	200	200	200
121	5" OIL ABSORBENT BOOM	1,000	25	150	100	100	1150	300	150	850	50	50	50
122	8" OIL ABSORBENT BOOM	200		10	25	150			25		25	25	25
123	UNIVERSAL ABSORBENT PADS	75	10	15	15				40	15	20	20	20
124	UNIVERSAL ABSORBENT BOOM	30	5	5	10				10	10	10	10	10
125	CHEMICAL ABSORBENT PADS	12	10	25	5	50	15		12	25	30	30	50
126	CHEMICAL ABSORBENT BOOM	25	5	10	5	50	10		6	12	10	10	10
127	OIL ABSORBENT ROLL	750	15	25	12	40	730	10	15	25	10	10	10
128	OIL ABSORBENT SWEEP	100		15	6				10	10	0	0	0
129	INDUSTRIAL CARPET	200	10	15	6	25	1170	25	25	50	10	10	10
130	POM-POM SNARE	150		25	10				25	25			
131	50' SNARE ON A ROPE	200		50	12	50			12	25			
132	100' SNARE ON A ROPE	300		50	6		580		6	30			
133	OIL GATOR	100	25	50	12	25	24	25	25	50	25	25	25
134	55 gal. PLASTIC DRUM	250	12	25	50	20	16	15	35	75	20	20	40
135	55 gal. STEEL DRUM	12	6	12	6		12		10	10	40	25	40
136	95 gal. PLASTIC SALVAGE DRUM	50	3	6	6	10	4	5	12	12	15	5	15
137	POLLUTION BAGS	320	10	25	25	150	32	100	50	150	50	50	50
138	POLY SHEETING	100	6	25	10	100	4	10	15	50	25	25	25
139	ROLL OFF BOX LINERS	100	6	12	10	50	100	15	15	25	100	100	100
140													
141													
142													
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148													
149													

Specific Information on Resources

Items 1 – 4: **Total** amount of containment boom stored at each ES&H office location.

Item 5: **Oil Spill Response Trailer** – contains up to 500' of containment boom, 1 drum skimmer package, 3 wash pump packages, PPE and various absorbent products. Designed to accommodate a 4 man crew working for 1 to 2 days on Average Most Probable Discharge (AMPD).

Item 6: **16' Containment Boom Trailer** – contains 1000' of 18" containment boom, anchors, anchor buoys and rope.

Item 7: **24' Containment Boom Trailer** – contains 2000' of 18" containment boom, anchors, anchor buoys and rope.

Item 8: **30' Containment Boom Trailer** – contains 3000' of 18" containment boom, anchors, anchor buoys and rope.

Item 9: **Haz-Mat Response Trailer** – contains specialized tools and equipment to respond to hazardous materials incidents; also contains chemical absorbent products and high level PPE. Designed to accommodate a 4 man crew responding to any hazardous materials incident.

Item 10: **Industrial Services Trailer** – contains specialized tools and equipment for industrial cleaning services, including confined space entry safety equipment and PPE.

Item 11: **Industrial Cleaning Trailer** – contains 350 gallon water storage tank and 4,000 psi hot water pressure washer. Self contained unit to perform industrial cleaning services.

Item 12: **Communications Trailer** – enclosed trailer with air conditioning; contains cellular and satellite communications and IT support. Self contained unit with generator and shore power capabilities.

Item 13: **Mobile Command Post Trailer** – enclosed trailer with air conditioning; contains work space for personnel on emergency response projects. Self contained unit with generator and shore power capabilities.

Item 14: **35' PPE/Consumables Trailer** – enclosed trailer containing significant quantities of PPE and consumable items.

Item 15: **48' Containment Boom Trailer** – 48' box trailer containing 6,000' of 18" containment boom, anchors, anchor buoys, and rope.

Item 16: **48' PPE Trailer** – 48' box trailer containing significant quantities of PPE (i.e., protective coveralls, inner and outer protective gloves, hard hats, safety glasses, etc.).

Item 17: **48' Decon Trailer** – 48' box trailer containing equipment decontamination supplies and equipment (i.e., decon pools, degreaser soap, hand tools, sorbent materials, etc.)

Item 18: **48' Consumables Trailer** – 48' box trailer containing variety of consumable items (i.e., pollution bags, poly sheeting, rope, degreaser soap, industrial carpet, etc.)

Item 19: **48' Absorbent Materials Trailer** – 48' box trailer containing oil absorbent materials (i.e., absorbent pads, 5" absorbent boom, etc.)

Item 31: **LORI Brush Skimmer** – 56’ OSRV with shallow draft capabilities. 2 side mounted LORI Brush Skimmers with 45’ skimming width. Capable of recovering spilled oil at rates up to 15 gpm. Storage capacity of 90 bbls.

Item 32: **JBF Skimmer** – 38’ OSRV DIP 3003 with Filterbelt skimming module capable of recovering spilled oil at rates up to 400 gpm. Storage capacity of 95 bbls.

Item 33: **Marco Skimmer** - Harbor Class OSRV (30’) with shallow draft capabilities. One foot (1’) wide Filterbelt skimming module capable of recovering spilled oil at rates up to 427 bbls per day. Storage capacity of 25 bbls.

Item 34: **Sidewinder Belt Skimmer** – Sorbent Lifting Belt Skimmer. Designed to be installed on any suitable vessel as an over-the-side skimmer for stationary and advancing applications. Capable of recovering spilled oil at rates of up to 773 bbls per day.

Item 35: **Goo Gobbler Skimmer** – Harbor Class OSRV (32’) with shallow draft capabilities. 30” aluminum cylinder skimmer capable of recovering spilled oil at rates up to 770 bbls per day.

Item 36: **Mobile Drum Skimmer Barge** – 8’ X 16’ shallow draft aluminum storage barge (25 bbl storage capacity) with Drum Skimmer Package.

Item 37: **Small Drum Skimmer** – Elastec MiniMax industrial skimmer. Recovery rate of up to 20 gpm.

Item 38: **Medium Drum Skimmer** – Elastec TDS 118 skimmer. Recovery rate of up to 35 gpm.

Item 39: **Large Drum Skimmer** – Elastec TDS 136 skimmer. Recovery rate of up to 70 gpm.

Item 40: **Small Skim Pak Skimmer** – Skim Pak Model 2300-SH floating suction skimmer. Self –adjusting weir with recovery rate of up to 58 gpm.

Item 41: **Medium Skim Pak Skimmer** – Skim Pak Model 4300-SH floating suction skimmer. Self-adjusting weir with recovery rate of up to 95 gpm.

Item 42: **Large Skim Pak Skimmer** – Skim Pak Model 18300-SH floating suction skimmer. Self-adjusting weir with recovery rate of up to 420 gpm.

Item 43: **Manta Ray Skimmer** – Rigid Manta Ray floating suction skimmer. Recovery rate of up to 150 gpm.

Item 44: **Rope Mop Skimmer** – 4” X 50’ Rope Mop (single roller). Recovery rate of up to 35 bbls per day.

Item 45: **30 bbl Oil Storage Barge** – 8’ X 16’ aluminum oil storage barge. 25 bbl storage capacity.

Item 46: **225 bbl Oil Storage Barges** – 8’ X 40’ aluminum oil storage barges (2 barges per set). Each set has 225 bbl storage capacity.

Item 65: **Triton Vacuum Unit** – 2500 Series (2500 cfm) Liquid Ring Vacuum Pump. Product intake through 6” inlet. Can load into collection tank or vacuum box, or alternatively into drums, supersacks, or open top boxes.

Item 66: **Portable Mini-Vac** – Mobile, portable vacuum system designed for spill recovery. Capable of recovering a wide range of liquids, oils and sludges with solids up to 2” diameter. Recovered material deposited into 500 gallon built-in storage tank.

Item 67: **Drum Head Vacuum Unit -** Mobile, portable vacuum system designed for spill recovery. Capable of recovering a wide range of liquids, oils and sludges with solids up to 2" diameter. Recovered material deposited into common open top drums.

Item 90: **4 Gas Air Monitoring Instrument -** Multi-gas detector used to monitor Oxygen, Lower Explosive Limit, Carbon Monoxide and Hydrogen Sulfide.

Item 91: **CMS Air Monitoring Instrument** – The Chip Measuring System (CMS) instrument provides a quantitative determination of hazardous gas or vapor concentrations in the air. Each chip is substance – specific and has 10 possible measurements per chip.

Item 92: **PID / FID** – Photoionization or Flame Ionization Detectors; used to measure volatile organic compounds and other gases in concentrations from sub parts per billion to 10,000 parts per million.

Item 93: **4 Gas PID + VOC** – 4 Gas Air Monitoring Instrument with Volatile Organic Compound measuring capabilities.

Item 94: **Chemical Specific PID** – Photoionization detector with specific chemical vapor or gas measuring ability.

Item 95: **NORM Survey Instrument** – Ludlum NORM Surveying Instrument calibrated to detect Radium 226.

CLEAN GULF  ASSOCIATES

SUBSIDIARY INFORMATION	
Company Name:	Williams Partners Operating, LLC
Primary Point of Contact Information	
Name:	Bola Adeshina
E-Mail Address:	Bola.Adeshina@williams.com
Office Phone:	(713) 215-3044
Alternate Point of Contact Information	
Name:	Rafael Castillo
E-Mail Address:	rafael.castillo@williams.com
Office Phone:	713-215-2641
COMPANY LIST	
Company Names: (List only wholly owned subsidiaries or companies that are being covered under the CGA Membership)	Williams Field Services Group, LLC
	Discovery Producer Services LLC
	Discovery Gas Transmission LLC
	Gulfstream Natural Gas System, LLC
	Transcontinental Gas Pipe Line Company, LLC
	Williams Field Services - Gulf Coast Company, LP
	Black Marlin Pipeline LLC; Williams Oil Gathering, LLC
	Williams Mobile Bay Producer Services, LLC
POC Signature:	
Date:	04/17/14

PLEASE RETURN TO:

Email: richj@cleangulfassoc.com
Jessica Rich
Clean Gulf Associates
650 Poydras Street. Suite 1020
New Orleans, Louisiana 70130
Phone: (504) 799-3033 Fax: (504) 799-3036

Clean Gulf Associates
"BY INDUSTRY, FOR INDUSTRY"

CLEAN GULF ASSOCIATES
Post Office Box 51239 New Orleans, Louisiana 70151

Please be advised Williams Partners Operating, LLC currently has a membership agreement with Clean Gulf Associates (CGA) as equipment provider and the following contracts or agreements by way of CGA membership:

Membership Agreement	CGA	February 5, 2013
Dispersant Air	ASI	February 5, 2013
Surge Capability	T&T	January 15, 2013
Response Personnel	CGAS	January 15, 2013

The subject contracts or membership agreements provide immediate access to available personnel and/or equipment 24-hour per day basis.

Signed: Jessica Rich
Title: Administrative Assistant
Dated: 2/6/13

Poydras Center • 650 Poydras Street • Suite 1020 • New Orleans, Louisiana 70130
P. O. Box 51239 • New Orleans, LA 70151
Phone (504)799-3035 • Fax (504) 799-3036

AMPOL

AMERICAN POLLUTION CONTROL, CORP.

6-16-14

Discovery Producer Services
Attention: Dale Fincher
P.O. Box 1699
Larose, LA. 70373

RE: Letter of Intent – Response Zone 2 – NGL Onshore Oil Pipeline located in Lafourche and St. Charles Parish.

Dear Sir/Madam,

Thank you for the opportunity to be of service to Discovery Producer Services. AMPOL can provide emergency response services to your facilities on a 24 hour basis. All of our response resources are listed within our United Stated Coast Guard (USCG) Oil Spill Removal Organization (OSRO) Classification. Our resources are maintained and exercised annually in accordance with the USCG PREP and OPA 90 readiness guidelines.

AMPOL is listed as an MM through W3 contractor with the USCG. Per 33CFR 154.1045 paragraph (c) (1) and (c) (2), all time and equipment requirements will be met for the worst case discharge. AMPOL is also listed as a group 5 OSRO with the USCG. All of AMPOL's response resources, maintenance and training records are available for inspection by Customer upon request. AMPOL will provide response services to Customer on an immediate basis. In the event AMPOL is unable to provide immediate response services for any reason whatsoever, AMPOL will make its best efforts to subcontract and/or assign the work to be performed hereunder. Response times will vary due to facility/vessel location.

This Letter of Intent (LOI) and support agreement documents will cover at a minimum a three-year period, starting in June 2014 through June 2017.

This Letter will provide proof of our intention to respond with all available resources, and participation in any drills or exercises that involve Ampol assets, persons, or resources. A Master Service Agreement or AMPOL's Services Contract with signatures by both the Customer and AMPOL must accompany this LOI as required by the USCG under CFR 33 **154.1028** (1).

24-Hour Emergency Response Hotline
1-800-482-6765

Again, thank you for the opportunity to be of service to Discovery Producer Services. If we can be of further assistance, please feel free to call at any time.

Sincerely,

Kirk Headley
AMPOL

401 W. Admiral Doyle Drive • New Iberia, LA 70560
(337) 365-7847 • Fax (337) 365-8890 • 1-800-482-6765

RESPONSE ACTIVITIES

I. In the event of an incident, the operating personnel will be responsible for the following actions pending the arrival of the qualified individual:

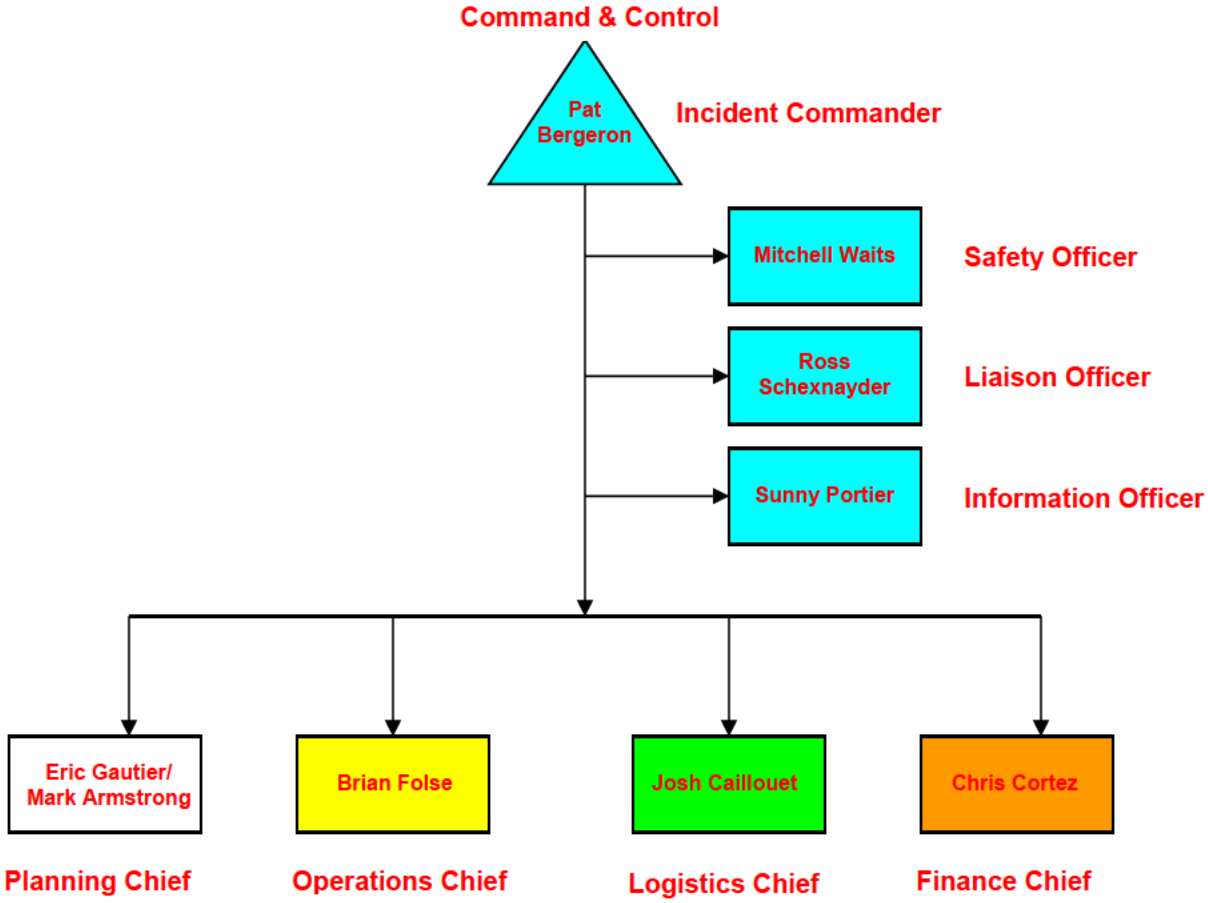
Responsibilities of Operating Personnel	
PRIORITY	ACTION
1.	The employee discovering the incident will immediately notify the pipeline supervisor or his designee at his facility.
2.	The pipeline supervisor or his designee will make an immediate assessment of the incident as observed or reported, and, in accordance with that assessment, will: A. Evacuate the immediate area and the area downwind of the spill; B. Eliminate sources of ignition; C. Keep all persons out of the danger area; D. Make notification to the appropriate Qualified Individual to begin all notifications. E. Take steps to secure the source of the spill if plausible and safe to do so; F. Direct initial containment procedures if feasible.
3.	The pipeline supervisor or his designee shall then contact the Qualified Individual to mobilize additional resources from the contracted Oil Spill Removal Organization if the situation warrants assistance.
4.	The pipeline supervisor or his designee shall take any steps feasible in order to minimize any threat to the public health and safety and to reduce the severity of the incident. • Until confirmed otherwise, the spill environment must be presumed to be hazardous. That presumption remains until the characteristics of the spilled material have been determined and the area has been properly tested. • Proper personnel protective equipment shall be utilized prior to entering a spill site. • If the spill observer does not have data and equipment to make that determination, an immediate request for this specific need should be made.
5.	The pipeline supervisor or his designee shall function as the responsible Discovery Producer Services person-in-charge until relieved by a Qualified Individual who will assume the position as On-Scene Commander and take over the spill response effort.
6.	The employee discovering the incident will immediately notify the pipeline supervisor or his designee at his facility.

II. In the event of an incident, the Qualified Individual shall be responsible for all of the duties listed below:

Responsibilities of the Qualified Individual	
PRIORITY	ACTION
1.	If appropriate, verify the sounding of the internal alarms system and the notification of the occupants of the facility hazard
2.	Notify local facility and OSRO response personnel, as needed
3.	Identify or verify the character, exact source, amount and extent of the release, along with other items needed for internal and external notifications as specified in this response plan
4.	Notify and provide information verbally to the appropriate Federal, State and Local authorities as described in the notifications tables in this response plan
5.	Assess the possible hazards to human health and the environment due to the release
6.	Assess and implement proper removal actions to contain and remove the substance released
7.	Coordinate rescue and response actions as previously arranged with all response personnel
8.	Use authority to immediately access company funding to initiate clean-up
9.	Direct clean-up activities until properly relieved of this responsibility by regional or National On-Scene Incident Commander or appropriate government authorities
10.	Develop and submit all required written notifications to the appropriate agencies concerning an incident

III. In the event of an incident, the Incident Command System will be used in order to assure proper coordination between the operator, the qualified individual and the on-scene commander responsible for monitoring or directing the spill. A description of the organization and members are given below. The personnel to fill these roles will come from Environmental Safety and Health Consulting Services, Inc. or from internal company personnel who have been trained to fill these roles.

ES&H/Forefront Emergency Management, L.P.
Incident Command Structure



Alternate SMT Members:

Pat Bergeron	Ross Schexnayder	Kylie Daigle	Candice Wallace
Kevin Voisin	Chris Cortez	Sami McCune	Stephen Hood
Heidi Danos	Jared Champagne	Britney Cates	Nicole Boucher
Brian Folse	Jimmy Green	Elissa Hunter	Adam Reynolds
Mitchell Waits	Jennifer Smith	Kimberly Westmoreland	Kyle Swartzfager
Eric Gautier	Mark Armstrong	Ashlyn Holmes	Jacqueline Levett-Prinsep
Tyra Chatagnier	Dallin Coffman	Mary Scott	
Josh Caillouet	Matthew Veley	Brian Quarterman	
Kelly Watson	Sunny Portier	Jessica Johnson	
Brandi Lirette	Allie Martin	JayLynn Thibault	
Gregory Serigny	Lacie Pierce	Kristen Magee	
Todd Folse	Stephanie Duchamp	Lauren Dehart	

SPILL MANAGEMENT TEAM CONTACT NUMBERS

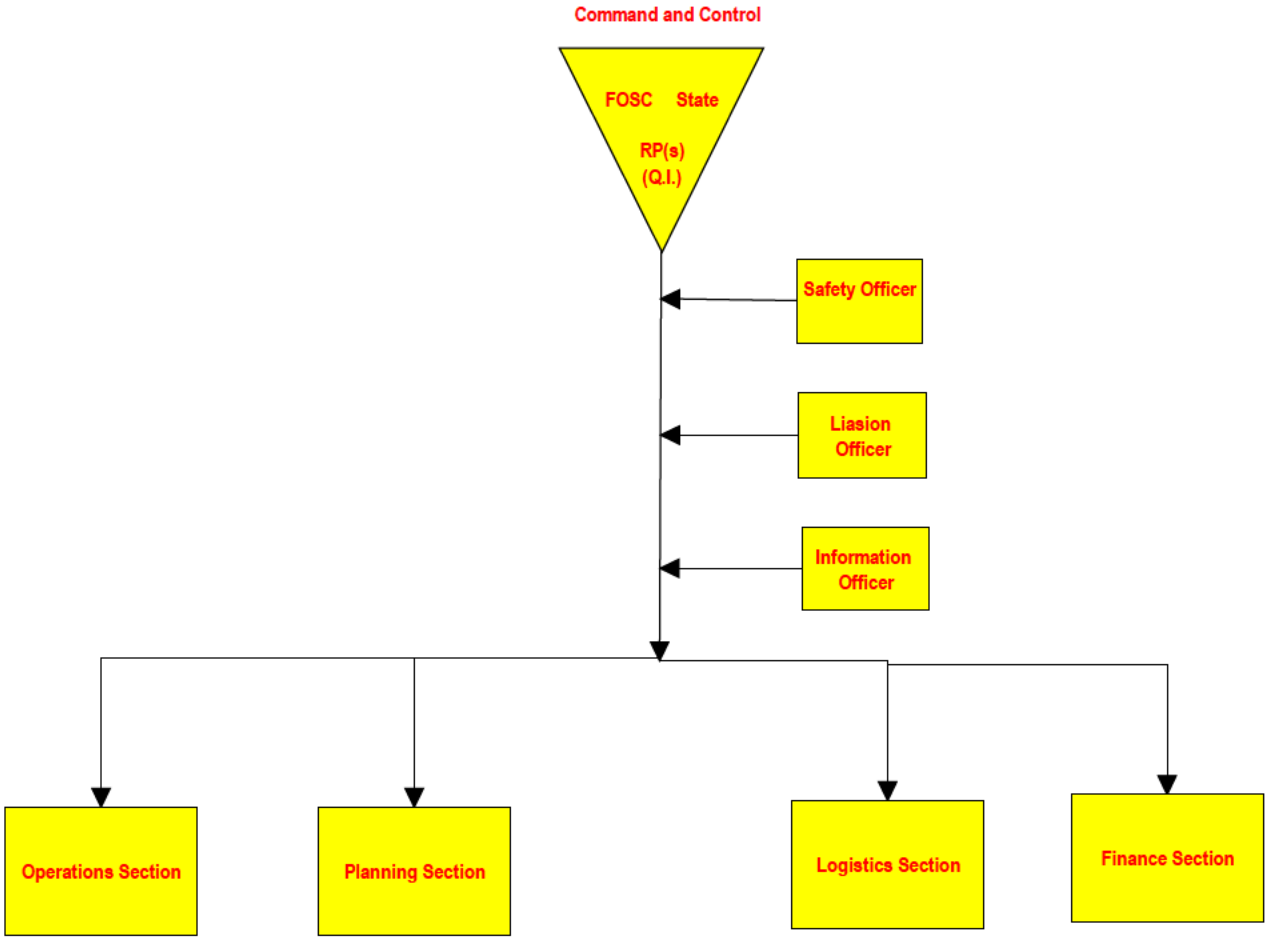
Position	Name	Work Address	Office (24 Hours)	Fax	Cell	E-mail	Response Time
Qualified Individual(s)	Brian Folse	1730 Coteau Rd., Houma, LA 70364	887-437-2634	985-851-7480	(b) (6)	bfolse@esandh.com	<1.0 Hour
	Mitchell Waits	1730 Coteau Rd., Houma, LA 70364	887-437-2634	985-851-7480		mwaits@esandh.com	<1.0 Hour
	Eric Gautier	1730 Coteau Rd., Houma, LA 70364	887-437-2643	985-851-7480		egautier@esandh.com	<1.0 Hour
Alternate Qualified Individual(s)	Pat Bergeron	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		pat@esandh.com	<1.0 Hour
	Kevin Voisin	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		kevin@esandh.com	6.0 Hours
Incident Commander	Pat Bergeron	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		pat@esandh.com	<1.0 Hour
	(Alt.) Kevin Voisin	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		kevin@esandh.com	6.0 Hours
Safety Officer	Mitchell Waits	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		mwaits@esandh.com	<1.0 Hour
	(Alt.) Eric Gautier	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		egautier@esandh.com	<1.0 Hour
Liaison Officer	Ross Schexnayder	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		rschexnayder@esandh.com	<1.0 Hour
	(Alt.) Mitchell Waits	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		mwaits@esandh.com	<1.0 Hour
Information Officer	Sunny Portier	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		sportier@esandh.com	<1.0 Hour
	(Alt.) Heidi Danos	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		heidi@esandh.com	<1.0 Hour
Planning Section Chief	Eric Gautier	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		egautier@esandh.com	<1.0 Hour
	(Alt.) Mark Armstrong	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		marmstrong@esandh.com	<1.0 Hour
	(Alt.) Heidi Danos	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		heidi@esandh.com	<1.0 Hour
	(Alt.) Tyra Chatagnier	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		twells@esandh.com	<1.0 Hour
Operations Section Chief	Brian Folse	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		bfolse@esandh.com	<1.0 Hour
	(Alt.) Josh Caillouet	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		jcaillouet@esandh.com	<1.0 Hour
Logistics Section Chief	Josh Caillouet	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		jcaillouet@esandh.com	<1.0 Hour
	(Alt.) Ross Schexnayder	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		rschexnayder@esandh.com	<1.0 Hour
Finance Section Chief	Chris Cortez	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		ccortez@esandh.com	<1.0 Hour
	(Alt.) Kelly Watson	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		kwatson@esandh.com	<1.0 Hour
Alternate SMT Member	Jimmy Green	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		jgreen@esandh.com	6.0 Hours
Alternate SMT Member	Jennifer Smith	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		jsmith@esandh.com	6.0 Hours
Alternate SMT Member	Todd Folse	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		tfolse@esandh.com	6.0 Hours
Alternate SMT Member	Jared Champagne	4141 S. Beglis Parkway, Sulphur, LA 70665	877-437-2634	337-558-7546		jchampagne@esandh.com	3.5 Hours
Alternate SMT Member	Dallin Coffman	4141 S. Beglis Parkway, Sulphur, LA 70665	877-437-2634	337-558-7546		dcoffman@esandh.com	3.5 Hours
Alternate SMT Member	Gregory Serigny	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		gserigny@esandh.com	<1.0 Hour
Alternate SMT Member	Brandi Lirette	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		bbrewer@esandh.com	<1.0 Hour
Alternate SMT Member	Stephanie Duchamp	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		sduchamp@esandh.com	6.0 Hours
Alternate SMT Member	Allie Martin	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		amartin@esandh.com	<1.0 Hour

SPILL MANAGEMENT TEAM CONTACT NUMBERS

Position	Name	Work Address	Office (24 Hours)	Fax	Cell	E-mail	Response Time
Alternate SMT Member	Kylie Daigle	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480	(b) (6)	kldaigle@esandh.com	<1.0 Hour
Alternate SMT Member	Matthew Veley	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		mveley@esandh.com	6.0 Hours
Alternate SMT Member	Sami McCune	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		smccune@esandh.com	<1.0 Hour
Alternate SMT Member	Lacie Pierce	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		lpierce@esandh.com	<1.0 Hour
Alternate SMT Member	Britney Cates	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		bcates@esandh.com	6.0 Hours
Alternate SMT Member	Elissa Hunter	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		ehunter@esandh.com	<1.0 Hour
Alternate SMT Member	Kimberly Westmoreland	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		kwestmoreland@esandh.com	<1.0 Hour
Alternate SMT Member	Ashlyn Holmes	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		amangham@esandh.com	<1.0 Hour
Alternate SMT Member	Mary Scott	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		mscott@esandh.com	<1.0 Hour
Alternate SMT Member	Brian Quarterman	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		bquarterman@esandh.com	<1.0 Hour
Alternate SMT Member	Jessica Johnson	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		jjohnson@esandh.com	<1.0 Hour
Alternate SMT Member	JayLynn Thibault	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		jthibault@esandh.com	6.0 Hours
Alternate SMT Member	Kristen Magee	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		kmagee@esandh.com	<1.0 Hour
Alternate SMT Member	Lauren Dehart	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		ldehart@esandh.com	<1.0 Hour
Alternate SMT Member	Candice Wallace	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		cwallace@esandh.com	<1.0 Hour
Alternate SMT Member	Stephen Hood	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		shood@esandh.com	<1.0 Hour
Alternate SMT Member	Nicole Boucher	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		nboucher@esandh.com	<1.0 Hour
Alternate SMT Member	Adam Reynolds	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		areynolds@forefrontem.com	6.0 Hours
Alternate SMT Member	Kyle Swartzfager	1730 Coteau Rd., Houma, LA 70364	877-437-2634	985-851-7480		kswartzfager@esandh.com	<1.0 Hour
Alternate SMT Member	Jacqueline Levett-Prinsep	2345 Atascocita Road, Humble, TX 77396	877-437-2634	281-448-6602		jlevett-prinsep@esandh.com	6.0 Hours

All ES&H/Forefront Emergency Management, L.P. personnel, listed in the table above, undergo annual SMT training under the direction of ES&H/Forefront Emergency Management, L.P.

INCIDENT COMMAND STRUCTURE



Command and Control

The command and control section is responsible for the overall management of the incident. This section directs incident activities including the development and implementation of strategic decisions and approves the ordering and releasing of resources. This section is responsible, among other things, for the following responsibilities:

- Assess the situation and/or obtain incident briefing from prior Incident Commander
- Determine incident objectives and strategies
- Establish the immediate priorities
- Establish an incident command post
- Establish an appropriate organization
- Brief command staff and all section chiefs of changes
- Ensure planning meetings are scheduled as required
- Approve and authorize the implementation of an incident action plan
- Determine information needs and advise Command and General Staff
- Manage incident operations

- Approve request for additional resources and request for the release of resources
- Authorize the release of information to news media
- Ensure incident funding is available
- Notify natural resource trustees and coordinate with a NRDA representatives
- Coordinate incident investigation responsibilities
- Seek appropriate legal counsel
- Order the demobilization of the incident when appropriate

Safety Officer

The safety Officer is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. The safety Officer will correct unsafe acts or conditions through the regular line of authority, although the Safety Officer may exercise emergency authority to stop or prevent unsafe acts when immediate action is required. The Safety Officer maintains awareness of active and developing situations, ensures the preparation and implementation of the Site Safety Plan, and includes safety messages in each Incident Action Plan. His job duties include:

- Identify hazardous or unsafe situations associated with the incident by ensuring the performance of preliminary and continuous site characterization and analysis which shall include the identification of all actual or potential physical, biological, and chemical hazards known or expected to be present on site
- Participate in planning meetings to identify any health and safety concerns inherent in the operations daily work plan
- Review the Incident Action Plan for safety implications
- Exercise emergency authority to stop and prevent unsafe acts
- Investigate accidents that have occurred within incident areas
- Ensure the preparation and implementation of the site specific Health and Safety Plan (HASP) in accordance with the Area Contingency Plan (ACP) and State and Federal OSHA regulations. The HASP shall at a minimum address, include or contain the following elements:
    - Health and Safety hazard analysis for each site task or operation
    - Comprehensive operations work plan
    - Personnel training requirements
    - PPE selection requirements
    - Site specific occupational medical monitoring requirements
    - Air monitoring plan: area/personnel
    - Site control measures
    - Confined space entry procedures (if needed)
    - Pre-entry briefings (tailgate meetings): initial and as needed
    - Pre-operations health and safety conference for all incident participants
    - Quality assurance of HASP effectiveness
- Assign assistants and manage the incident safety organization
- Review and approve the medical plan

Liaison Officer

Incidents that are multi-jurisdictional, or have several agencies involved, may require the establishment of the Liaison Officer position on the command staff

- Provide a point of contact for assisting and cooperating with Agency Representatives
- Identify Agency Representatives from each agency including communications link and location
- Maintain a list of assisting and coordinating interagency contacts
- Assist in establishing and coordinating interagency contacts
- Keep agencies supporting incident aware of incident status
- Monitor incident operations to identify current or potential inter-organizational issues and advise Incident Command as appropriate
- Participate in planning meetings, provide current resource status information, including limitations and capabilities of assisting agency resources

Information Officer

The Information Officer is responsible for developing and releasing information about the incident to the news media, to incident personnel, and to the appropriate agencies and organizations.

Only one information officer will be assigned for each incident, including incidents operating under Unified Command and multi-jurisdictional incidents. The Information Officer may have assistants as necessary, and the assistants may also represent assisting agencies or jurisdictions. The Information Officer is responsible for the following task:

- Determine from the Incident Commander if there are any limits on information release
- Develop material for use in media briefings
- Obtain Incident Commander approval for media releases
- Inform media and conduct media briefings
- Arrange for tours and other interviews or briefings that may be required
- Obtain media information that may be useful to incident planning
- Maintain current information summaries and/or displays on the incident and provide information on status of incident to assigned personnel

Operations Section

The Operations Section Chief is responsible for the management of all operations directly applicable to the primary mission. The Operations Chief activates and supervises elements in accordance with the Incident Action Plan and directs its execution; activates and executes the Site Safety Plan; directs the preparation of unit operational plans, request or releases resources, makes expedient changes to the Incident Action Plans as necessary, and reports such to the Incident Commander. The Operations section chief is further responsible for the following task:

- Develop operations portion of the Incident Action Plan
- Brief and assign operations personnel in accordance with Incident Action Plan
- Supervise the execution of the Incident Action Plan for operations

- Request resources needed to implement the operation's tactics as part of the Incident Action Plan development
- Ensure safe tactical operations
- Make or approve expedient changes to the Incident Action Plan during the operational period as necessary
- Approve suggested list of resources to be released from assigned status (not released from incident)
- Assemble and disassemble teams/task forces assigned to operations section
- Report information about changes in the implementation of the IAP, special activities, events, and occurrences to the Incident Commander as well as to the Planning Section Chief and Information Officer

Planning Section

The planning section chief is responsible for the collection, evaluation, dissemination and use of information about the development of the incident and status of resources. Information is needed to 1) understand the current situation, 2) predict probable course of incident events, and 3) prepare alternative strategies for the incident. His task includes the following duties:

- Activate planning section units
- Assign available personnel already on site to ICS organizational positions as appropriate
- Collect and process situation information about the incident
- Supervise preparation of the Incident Action Plan
- Provide input to the Incident Command and Operations Section Chief in preparing the Incident Action Plan
- Participate in planning and other meetings as necessary
- Establish information requirements and reporting schedules for all ICS organizational elements for use in preparing the Incident Action Plan
- Determine need for any specialized resources in support of the incident
- Provide resources unit with planning section's organizational structure including names and locations of assigned personnel
- Assign technical specialist where needed
- Assemble information on alternative strategies
- Assemble and disassemble teams or task forces as necessary
- Provide periodic predictions on incident potential
- Compile and display incident status summary information
- Provide status reports to appropriate requesters
- Advise general staff of any significant changes in incident status
- Incorporate the incident traffic plan, vessel routing plan, and other supporting plans into the Incident Action Plan
- Instruct planning section units in distribution and routing of incident information
- Prepare recommendations for release of resources for submission to members of incident command
- Maintain section records

Logistics Section

The logistics section chief is responsible for providing facilities, services, and material in support of the incident. The logistics section chief participates in the development and implementation of the Incident Action Plan and activates and supervises Branches and Units within the logistics section. His task includes the following duties;

- Plan organization of Logistics section
- Assign work locations and preliminary work tasks to section personnel
- Notify resources unit that logistics section is activated including the names and locations of assigned personnel
- Assemble and brief branch directors and unit leaders
- Participate in preparation of the Incident Action Plan
- Identify service and support requirements for planned and expected operations
- Provide input to and review Communications Plan, Medical Plan, Traffic Plan and Vessel Routing Plan.
- Coordinate and process request for additional resources
- Review Incident Action Plan and estimate section needs for next operational period
- Advise on current service and support capabilities
- Prepare service and support elements of the Incident Action Plan
- Estimate future service and support requirements
- Receive demobilization plan from Planning section
- Recommend release of unit resources in conformance with demobilization plan
- Ensure general welfare and safety of Logistics section personnel

Finance Section

The Finance/Administration section chief, a member of the general staff, is responsible for all financial and cost analysis aspects of the incident and for supervising members of the Finance/Administration Section.

- Attend briefing with responsible agency to gather information
- Attend planning meetings to gather information on overall strategy
- Determine resource needs
- Develop an operating plan for Finance/Administration function on incident
- Prepare work objectives for subordinates brief staff, make assignments, and evaluate performance
- Inform members of the unified command and general staff when section is fully operational
- Meet with assisting and cooperating agency representatives as required
- Provide input in all planning sessions on financial and cost analysis matters
- Maintain daily contact with agency administrative headquarters on finance matters
- Ensure that all personnel time records are transmitted to home agencies according to policy
- Participate in all demobilization planning
- Ensure that all obligation documents initiated at the incident are properly prepared and completed
- Brief agency administration personnel on all incident related business management issues needing attention and follow-up prior to leaving incident

RESPONSE MANAGEMENT AND DOCUMENTATION

In order to ensure proper documentation of the decision-making process, activities, and costs, Discovery Producer Services follows the National Interagency Incident Management System (NIIMS) including the NIIMS Incident Action Plan (IAP) Form system. Through contractual agreements, Discovery Producer Services has access to a digital database system capable of producing, storing, and electronically transmitting appropriate IAP documentation.

During each phase of a response, all members of the Spill Management Team will document their actions on unit logs that will be maintained through the incident. At the end of each operating period, an Incident Action Plan will be developed by the Planning Section to document the events that have taken place and plan for future operations.

IV. In the event of an incident, equipment for response activities is available on a 24-hour basis at the following locations:

Company Name	Location	24-hour Contact Information
ES&H The Total Assurance Team	Gulf Coast 1730 Coteau Rd. Houma, LA 70364	877-437-2634
Clean Gulf Associates	650 Poydras Street, Suite 1020 New Orleans, LA 70130	888-242-2007
AMPOL	Gulf Coast 401 West Admiral Doyle New Iberia, LA 70560	337-365-7847

Please see the list of equipment available for use during an incident as well as the training records located in the previous section as well as the location of these resources on the overview map in the Information Summary section of this appendix.

DISPOSAL CONTRACTORS

Waste generated during a worst case discharged will be properly disposed off at one the facilities listed below:

- Waste Management – Walker, LA
- USLLA dba R360 Environmental Solutions – Bourg, LA
- Houma Salt Water Disposal – Houma, LA
- Newpark Drilling Fluids – Multiple locations

DISPOSAL PLAN

Procedures for Waste Disposal:

- Waste oil and other debris will be recovered by HAZWOPER trained technicians
- Recovered liquid products will be temporarily stored in oil barges or vacuum trucks depending on the accessibility of the recovery area.
- Recovered debris, solid waste, or contaminated soils will be temporarily stored in properly lined open top hopper boxes and/or roll-off boxes on-site.
- A representative grab sample will be collected from the waste to be analyzed as per the requirements of the disposal facility. In general, a Full TCLP analysis will be required to dispose of oil contaminated debris, waste, or soils; however, in some situations only a TCLP Benzene will be required.
- Upon receipt of the results of these analyses, a waste profile will be developed at the appropriate waste disposal facility as given in the table on the preceding page.
- Upon approval of the results, the product will be transported to the appropriate facility.

The above described procedures have been developed with consideration for the federal, state, and local requirements for waste disposal as given in the applicable ACP's for this operating environment.

The mobilization of personnel, vacuum trucks, and barges necessary to accomplish the waste disposal procedures described above for the pipeline covered in this plan will primarily be mobilized from the Houma, LA area and is expected to be able to be mobilized within 4 Hours.

WASTE DISPOSAL CONTRACTORS AND PROCEDURES CONTINUED

As outlined in the New Orleans/ Baton Rouge Coast Guard ACP, the disposal procedures shall include and/or consider:

Section 560: Temporary Storage, Treatment, Disposal

The disposal of contaminated waste associated with pollution response activities is a critical issue which must be addressed prior to the spill incident. The procedures for disposing of all contaminated waste from a spill must be in place to ensure safe, proper and legal disposal of these products. Louisiana and Mississippi DEQs are responsible for providing guidance on all disposal issues, including storage and transportation. State permits are required for generating, storing, transporting and disposing of non-hazardous and hazardous waste. DEQs also are responsible for issuing State permits to dispose of oils or hazardous wastes during removal operations.

Section 561: Disposal Process

The disposal process follows a series of steps. In general, the following events should occur.

- Identify the pollutant and classify as hazardous or non-hazardous. (Note: Identification of material

WASTE DISPOSAL CONTRACTORS AND PROCEDURES CONTINUED

should not delay the next step).

- Notify proper federal, state and local authorities.
- Review federal, state and local laws/regulations.
- Calculate the volume of oil or hazardous substance for disposal.
- Identify disposal options and/or locations (on site vs. offsite); consider recycling or reclamation.
- Obtain necessary permits.
- Secure transportation for product disposal.
- Outline the disposal plan.

TRAINING PROCEDURES

Discovery Producer Services has designed a strenous training regimine for the personnel with duties under this response plan. This program has been designed to meet the training requirements for Qualified Individuals and Incident Commanders given in the Code of Fderal Regulations sections given below:

- 33 CFR PART 154
- 49 CFR PART 194
- 40 CFR PART 112
- 29 CFR PART 1910.120

This program includes a significant amount of inhouse training on the operation and use of the systems controlling the Discovery Producer Services pipeline operations. This training specifically addresses the employees knowledge of the internal operating procedures of Discovery Producer Services. The goal of this training is to insure that these individual s are capable of the following:

A. Activate internal alarms and hazard communication system to notify all facility personnel;
B. Notify all response personnel as needed;
C. Identify the character, exact source, amount, and extent of the release, as well as the other appropriate items needed for notification;
D. Notify and provide necessary information to the federal, state and local authorities with designated response roles including:
    1. The National Response Center
    2. The State Emergency Response Commission
    3. The Local Emergency Planning Committee
E. Assess the interaction of the spilled substance with water and/or other substances stored at the facility and notify response personnel at the scene of that assessment;
F. Assess the possible hazards to human health and the environment due to the release. This assessment must consider both the direct and indirect effects of the release (i.e., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat induced explosion);
G. Assess and implement prompt removal actions to contain and remove the substance released;
H. Coordinate rescue and response actions as previously arranged with all response personnel;
I. Use authority to immediately access company funding to initiate clean-up activities;
J. Direct clean-up activities until properly relieved of this responsibility.

Additionally, the Qualified Individuals identified in this response plan will undergo training from indusrty professionals in the following issues:

- **24-hour HAZWOPER (8-hour Refresher)**

DOT RELATED TRAINING

Discovery Producer Services' internal training system, managed by Discovery Producer Services is designed to ensure that:

All Personnel Know –

- Their responsibilities under the response plan
- The name and address of, and the procedure for contacting, the operator on a 24-hour basis
- The name of, and procedures for contacting, the qualified individual on a 24-hour basis

Reporting Personnel Know –

- The content of the information summary of the response plan
- The toll-free telephone number of the National Response Center
- The notification process

Personnel Engaged in Response Activities Know –

- The characteristics and hazards of the oil discharged
- The conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures, and the appropriate corrective actions
- The steps necessary to control any accidental discharge of oil and to minimize the potential for fire, explosion, toxicity, or environmental damage
- The proper firefighting procedures and use of equipment, fire suits, and breathing apparatus

Discovery Producer Services shall maintain a training record for each individual that has been trained as required by this section. These records will be maintained as long as the individual has assigned duties under this response plan in the following manner:

- Records for operator personnel will maintained at the Discovery Producer Services headquarters
- Records for personnel engaged in response operations will be maintained at the headquarters of the response organization

EXERCISE PROCEDURES

OWNER OR OPERATOR INTERNAL NOTIFICATION EXERCISES

Onshore Transportation – Related Pipelines

Applicability: Pipeline owner or operator

Frequency: As indicated by the response plan and, at a minimum, consistent with triennial cycle (quarterly).

Party Initiating **Exercise:** As indicated in response plan.

Participants: Facility response personnel and the facility's qualified individuals.

Scope: Exercise notification process between key facility personnel and the qualified individual to demonstrate the accessibility of the qualified individual.

Objectives: Contact by telephone, radio, message – pager, or facsimile and confirmation established as indicated in response plan.

Format: As indicated in response plan.

Certification: Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by Research and Special Programs Administration (PHMSA) during regular inspections***** or RSPA tabletop exercises.

*** Verification will not be done by inspection in the near term.**

Records:

Retention: 3 years

Location: Owner or operator shall retain records as indicated in response plan.

PHMSA to retain verification records.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

INTERNAL TABLETOP EXERCISE

Onshore Transportation – Related Pipelines

Applicability: Pipeline owner or operator.

Frequency: As indicated by the response plan and, at a minimum, consistent with the triennial (annually).

Party Initiating Exercise: As indicated in response plan.

Participants: Designated spill emergency response team members.

Scope: Demonstration of the response team's ability to organize, communicate, and make strategic decisions regarding population and environmental protection during a spill event.

Objectives: Designated emergency response team members should demonstrate –

(1) Knowledge of facility response plan;

(2) Ability to organize team members to effectively interface with a unified command;

(3) Communication capability; and

(4) Coordination for response capability as outlined in response plan.

Format: Internal tabletop exercise as outlined in response plan.

Certification: Self-certification as indicated in response plan or as defined in the "Guiding Principles" section of this document,

whichever is more stringent. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by PHMSA during regular inspections * or PHMSA tabletop exercises.

*** Verification will not be done by inspections in the near term.**

Records:

Retention: 3 years.

Location: Owner or operator shall retain records as indicated in response plan.

PHMSA to retain verification records

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

OWNER/OPERATOR EQUIPMENT DEPLOYMENT EXERCISES

Onshore Transportation – Related Pipelines

Applicability: Pipelines owner or operator.

Frequency: As indicated by the response plan and, at a minimum, consistent with the triennial cycle (annually).*

*** The number of equipment deployment exercises conducted should be such that equipment and personnel assigned to each response zone are exercised at least once per year. If the same personnel and equipment response to multiple equipment respond to various response zones, each must participate in an annual equipment deployment exercise.**

Party Initiating Exercise: As indicated in response plan.

Participants: Designated spill emergency response team members.

Scope: Demonstrate ability to deploy spill response equipment * identified in the FRP.

*** May consist entirely of operator owned equipment, or a combination of OSRO and operator equipment.**

Objectives: Designated emergency response personnel should demonstrate - -

(1) Ability to organize; and

(2) Ability to deploy and operate representative types of key response equipment as described in response plan.

Format: Announced deployment exercise indicated in response plan.

Certification: Self-certification as indicated in response plan. Each plan should have a written description of the company's certification process.

Verification: Verification conducted by PHMSA during regular inspections* or PHMSA tabletop exercises.

*** Verification will not be done by inspections in the near term.**

Records:

Retention: 3 years.

Location: Owner or operator shall retain records as indicated in response plan.

PHMSA to retain verification records

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated.

UNANNOUNCED EXERCISES

Onshore Transportation – Related Pipelines

Applicability: Pipeline owner/operator.

Frequency: Maximum of 2 unannounced PHMSA exercises conducted annually for the pipeline industry as a whole. A single owner or operator will not be required to participate in a PHMSA – initiated unannounced exercise, if they have already participated in one within the previous 36 months.

Party Initiating Exercise: **PHMSA**.

Participants: Designated spill emergency response team members.

Operations Staff.

On-Scene Coordinator (optional).

State and local government (optional).

Scope: Demonstrate ability to respond to a worst-case discharge spill event.

Objectives: Designated emergency response team member should demonstrate adequate knowledge of their facility response plan and the ability to organize, communicate, coordinate, and respond in accordance with that plan.

Format: Unannounced tabletop exercise to discuss strategic issues.

Operations will provide the owner or operator the following information at least 10 working days in advance (1) date, time, and location of exercise; (2) expected exercise duration; and (3) response zone to be exercised.

On the day of the exercise, the pipeline owner or operator will be provided the scenario and post – spill events. This information will be used to explore and discuss strategic issues that will help operators evaluate their response plans.

Certification: Certification can be effected by PHMSA personnel conducting the exercise. PHMSA will provide written certification of the exercise date, participants, and response zone exercised.

Verification: Verification can be made by PHMSA personnel conducting the exercise.

Records:

Retention Time: 3 years.

Location: Owner or Operator shall retain records as indicated in response plan.

PHMSA to retain verification records.

Credit: Plan holder should take credit for this exercise when conducted in conjunction with other exercises as long as all objectives are met, the exercise is evaluated, and a proper record is generated. Credit should be taken for an actual spill response when these objectives are met, the response is evaluated, and a proper record is generated

EXERCISE PROCEDURES

The responsibility for ensuring the appropriate planning, facilitation, and monitoring of the drills described in this section will be with Discovery Producer Services in conjunction with ES&H/Forefront Emergency Management, L.P.

The drill procedures described in this section will be conducted in such a fashion as to ensure that all aspects of the response plan are exercised at least every three years for each response zone.

Discovery Producer Services Internal Exercise Documentation Form

Qualified Individual Notification Exercise

1.	**Date Performed:**	
2.	**Exercise or Actual Response?**	
3.	Facility Involved:	
4.	Persons Involved:	
5.	Time Initiated:	
6.	Time QI Responded:	
7.	**Method of Contact:** *(telephone, pager, radio, other)*	
8.	**Notification Procedure:**	
9.	**Core Components Exercised:**	

I hereby certify that this drill has been conducted in the form described by The National Preparedness for Response Exercise Program (PREP) Guidelines in order to satisfy the requirements of 30 CFR 254, 33 CFR 154, 40 CFR 112, and 49 CFR 194.

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Discovery Producer Services

Discovery Producer Services Internal Exercise Documentation Form

Equipment Deployment Exercise

1.	**Date Performed:**	
2.	**Time Performed (Begin-End)**	
3.	Exercise or Response	
4.	Persons Involved	
5.	Facility Involved	
6.	OSRO Involved	

7.	**Description of Exercise**

8.

Equipment Deployed	Equipment Condition

9.

Exercise Objectives	Exercise Outcome

10.

Parts of Facility Response Plan Addressed by This Exercise	
2	Staff Mobilization
3.a.4	Unified Command / Responsible Party Representation
3.b.6	Response Management System / Containment
3.b.7	Response Management System / Recovery
3.b.8.1	Response Management System / Protection/Protective Booming
10	Communications
11.2	Waterborne Transportation
12.1	Personnel Support / Management
13.1	Equipment Maintenance & Support / Response Equipment
13.2	Equipment Maintenance & Support / Support Equipment
14.1	Procurement / Personnel
14.2	Procurement / Response Equipment
14.3	Procurement / Support Equipment
15	Documentation

11.	Lessons Learned

I hereby certify that this drill has been conducted in the form described by The National Preparedness for Response Exercise Program (PREP) Guidelines in order to satisfy the requirements of 30 CFR 254, 33 CFR 154, 40 CFR 112, and 49 CFR 194.

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Discovery Producer Services

Discovery Producer Services Internal Exercise Documentation Form

Tabletop Exercise

1.	**Date Performed:**	
2.	**Exercise or Response:**	
3.	Facility Involved:	
4.	Time (start-stop):	
5.	Product Type and Amount for (simulated) spill	
6.	Personnel Involved	

7.	**Description of Exercise**
	a) Spill management team's knowledge of oil-sill response plan:
	b) Proper Notifications:
	c) Communications System:
	d) Spill management team's ability to access contracted OSRO:

e) Spill management team's ability to coordinate spill response with On-Scene Coordinator, state, and applicable agencies:
f) Spill management team's ability to access sensitive site and resource information in the Area Contingency Plan:

8.

Parts of Facility Response Plan Addressed by This Exercise	
1	Notifications
2	Staff Mobilization
3.a	Unified Command
3.b	Response Management System
4	Discharge Control
5	Assessment
6	Containment
7	Recovery
8	Protection
9	Disposal
10	Communications
11	Transportation
12	Personnel Support
13	Equipment Maintenance & Support
14	Procurement
15	Documentation

9.	Lessons Learned

I hereby certify that this drill has been conducted in the form described by The National Preparedness for Response Exercise Program (PREP) Guidelines in order to satisfy the requirements of 30 CFR 254, 33 CFR 154, 40 CFR 112, and 49 CFR 194.

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Discovery Producer Services

RESPONSE PLAN REVIEW AND UPDATE PROCEDURES

The review and update procedures used for this response plan shall conform to 49 CFR part 194.121 and will include at a minimum:
A. Each operator shall review its respone plan at least every (5) years from the date of submission and modify the plan to address new or different operating conditions or information included in the plan.
B. If a new or different operating condition or information would substantially affect the implementation of a response plan, the operator must immediately modify its response plan to address such a change and, within 30 days of making such a change, submit the change to PHMSA. Examples of changes in operating conditions that would cause a significant change to an operators response plan are:
1. An extension of an exsisting pipeline or construction of a new pipeline in a response zone not covered by the previously approved plan;
2. Relocation or replacement of the pipeline in a way that substantially affects the information included in the respone plan, such as to change the worst case discharge volume;
3. The type of oil transported, if the type affects the required response resources, such as a change from crude oil to gasoline;
4. The name of the oil spill removal organization;
5. Emergency Response Procedures;
6. The Qualified Individual;
7. A change in the NCP or an ACP that has significant impact on the equipment appropriate for response activities; and
8. Any other information relating to circumstances that may affect full implementation of the plan.
C. If PHMSA determines that a change to a response plan does not meet the requirements of this part, PHMSA will notify the operator of any alledged deficiencies, and provide the operator an opportunity to respond, including an opportunity for an informal conference, to any proposed plan revisions and an opportunity to correct any deficiencies.
D. An Operator who disagrees with a determination that proposed revisions to a plan are deficient may petition PHMSA for reconsideration, within 30 days from the date of receipt of PHMSA's notice. After considering all relevant material presented in writing or at the conference, PHMSA will notify the operator of its final decision. The operator must comply with the final decision within 30 days of issuance unless PHMSA allows additional time.
E. The operator will also review the response plan for its effectiveness upon completion of any worst case discharge in which the response plan was implemented to direct spill operations. The operator shall also incorporate any necessary revisions to the procedures outlined in this plan as they are found during

	the course of such a response. It will be the responsibility of Discovery Producer Services working in conjunction with ES&H, to ensure any revisions are properly incorporated after any incident in which the response plan is utilized.
F.	The operator will also review the response plan for its effectiveness upon completion of any worst case discharge drill in which the response plan was implemented to direct drill operations. The operator shall aslo incorporate any necessary revisions to the procedures outlined in this plan as they are found during the course of such a drill. It will be the responsibility of Discovery Producer Services working in conjunction with ES&H, to ensure any revisions are properly incorporated after any drill in which the response plan is utilized.

RECORD OF CHANGES				
When this plan is updated, the updated section(s) will be listed in this table along with the date and authorization required.				
Date	**Type of Revision**	**Updated Section(s)**	**Description of Updates**	**Authorization**
2003	Initial Draft		-	Dale Fincher
November 2004	Annual Review	-	No Revisions Needed	Dale Fincher
2005	Annual Review	-	No Revisions Needed	Dale Fincher
June 2006	Annual Review	-	No Revisions Needed	Dale Fincher
October 2007	Annual Review	-	No Revisions Needed	Dale Fincher
December 2008	Annual Review	-	No Revisions Needed	Dale Fincher
September 2009	Annual Review	-	No Revisions Needed	Dale Fincher
August 2010	Annual Review	-	Reviewed and revised entire manual.	Dale Fincher
August 2011	Annual Review	-	No Revisions Needed	Dale Fincher
August 2012	Annual Review	-	No Revisions Needed	Dale Fincher
August 2013	Annual Review	-	No Revisions Needed	Dale Fincher
May 2014	Annual Review & Revisions due to personnel changes	Cover Page; Sections 1, 2, 3, 4, 6, 7, 10, 11, 12, 14, & 15	**Cover Page** – Updated company logo **Section 1** Pages 1-4 – Updated employee contact list **Section 2** Pages 2-7 – Updated company logo **Section 3** Page 1 – Updated worst case discharge **Section 4** Page 1 – Updated key pipeline segment areas and systems Pages 2-3 – Updated company logo Page 7 – Updated Gheens valve site Pages 9-10 – Updated Bayou Des Allemands valve site Page 12 – Updated Paradis plant	Dale Fincher

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May 2014	Annual Review & Revisions due to personnel changes	Cover Page; Sections 1, 2, 3, 4, 6, 7, 10, 11, 12, 14, & 15	**Section 6** Page 1 – Updated key block valve sites **Section 7** Page 1 – Updated environmental sensitivity and primary environmentally sensitive areas Pages 2-3 – Updated company logo Pages 10-11 – Updated Site C- Bayou Des Allemands/ Bayou Gauche **Section 10** Page 1 – Updated agency contact information Pages 2-3 – Updated employee contact list Page 4 – Updated communication equipment information **Section 11** Page 5 – Updated OSROs Pages 6-21 – Addition of ES&H, AMPOL, & CGA contracts and updated ES&H equipment list **Section 12** Page 3 – Updated ICS flowchart Pages 4-5 – Updated SMT contact list Page 11 – Updated OSROs and waste disposal contractors Page 12 – Updated waste disposal contractors and procedures continued **Section 14** Pages 1-7 – Updated exercise procedures **Section 15** Page 1 – Updated response plan review and updated procedures	Dale Fincher