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Table of Contents

	page
1.0 Purpose.....	4
2.0 Goals.....	4
3.0 Focus Areas	4
4.0 Significant Activities	5
5.0 Contractors and Sub Contractors.....	5
5.1. Bridging Documents	5
6.0 Positive Recognition Program	6
7.0 Life Saving Rules.....	6
Communicating Standards to the Workforce	7
8.0 Hazard Identification and Risk Assessment.....	8
8.1. Risk Assessments	8
8.2. Hazard Identification	8
8.3. Concurrent Work Activities Review.....	8
8.4. Work Permits.....	8
8.5. Field Level Risk Assessment (FLRA)	9
9.0 Pre Turnaround Communication	9
9.1. Turnaround Information.....	9
9.2. Safety Team Awareness.....	9
10.0 Turnaround Orientation.....	9
10.1. General Turnaround Orientation.....	9
11.0 HSE Communications.....	10
11.1. HSE Communications Flow	10
11.2. HSE Stand Downs.....	10
11.3. Daily HSE Update	10
11.4. Daily Pre-Start Discussions	11
11.5. Daily Safety Team Meetings	11
12.0 Incident Management	11
13.0 Inspections & Safety Walks.....	12
13.1. Personal Safety Involvement (PSI).....	12
13.2. Permit to Work Reviews and Work Site Inspections	12
13.3. HSE and Leadership Visits.....	12
13.4. Hazard Recognition.....	12

- 13.5. Contractor Senior Management Leadership Visits..... 12
- 13.6. ConocoPhillips Leadership Visits 12
- 14.0 Safety Support..... 12**
 - 14.1. CPC HSE Team..... 12
 - 14.2. Safety Watch and Contract HSE Support..... 13
- 15.0 Emergency Preparedness and Support 13**
 - 15.1. Emergency Plan 13
- 16.0 Medical Support 13**
- 17.0 Occupational Health Management..... 14**
 - 17.1. Fit for Duty and Drug & Alcohol Testing..... 14
 - 17.2. Fatigue Management 14
- 18.0 Health Surveillance 15**
 - 18.1. Benzene Health Surveillance 15
 - 18.2. Naturally Occurring Radioactive Materials (NORMS)..... 15
 - 18.3. Hearing Protection/Surveillance 15
 - 18.4. Refractory Ceramic Fiber/Asbestos..... 15
- 19.0 Safe Work Procedures 16**
 - 19.1. Hydrogen Sulfide (H₂S)..... 16
 - 19.2. First Break Process..... 16
 - 19.3. PSV Removal..... 16
 - 19.4. Barriers and Safety Signs 16
 - 19.5. Danger Barricading 16
 - 19.6. Caution Barricading 16
 - 19.7. Radiation Barricading and Nuclear Gauges 16
 - 19.8. Elevated Work/Fall Protection 17
 - 19.9. Anchor Points 18
 - 19.10. One Hundred Percent Tie-Off Requirement..... 18
 - 19.11. Working from Ladders..... 18
 - 19.12. Equipment Placement and Usage 18
 - 19.13. Hot Work 19
 - 19.14. Confined/Restricted Space 19
 - 19.15. Safety Data Sheets..... 19
 - 19.16. Personal Protective Equipment..... 19
 - 19.17. Personal Gas Monitors 19
 - 19.18. Scaffolding 19
 - 19.19. Smoking 20
 - 19.20. Vehicle Operations 20
 - 19.21. Lifting Operations 20
- 20.0 Environmental..... 21**
 - 20.1. Spills..... 21
 - 20.2. Housekeeping 22
 - 20.3. Waste Management 22

21.0 Wildlife 23

22.0 Weather and Other Natural Events 23

 22.1. Lightning 23

 22.2. Forest Fires 24

Appendix A – “Example” Daily Communication Sheet 25

Appendix B – CARE Card..... 26

Appendix C – Incident Reporting Flowchart 27

23.0 References 28

24.0 Document Retention 29

Appendix D – Revision Record 30

1.0 Purpose

The purpose of this Health Safety and Environment (HSE) Management Plan is to establish the structure for managing health, safety and environment aspects of the work to be executed during Surmont turnaround activities.

This plan provides information on bridging company and contractor HSE procedures and documents to formalize an agreed approach for management of the HSE activities during all phases of the turnaround work.

Unless specifically identified, the existing ConocoPhillips Canada (CPC), safety and environmental systems, policies and procedures shall be maintained to provide direction and control HSE management during Surmont Turnarounds.

The intent of this document is to provide the necessary guidance to ensure that the turnaround scope of work is completed without incident and in a safe manner in line with CPC HSE policy.

2.0 Goals

The following targets should be used and communicated to the workforce on prior to and during every turnaround:

- Achieve Triple Zero – ConocoPhillips Canada tracks HSE Performance using Triple Zero Classifications. Triple Zero incidents are divided into three categories:
 - **Triple Zero Injury** - Work related injuries determined to be fatalities, lost workday cases, restricted workday cases or medical treatments cases.
 - **Triple Zero Spill** - Releases of liquid products that exceed thresholds for regulatory reporting in the applicable provincial legislation
 - **Triple Zero Vehicle** - High impact vehicle incidents where the driver is deemed to be responsible in the course of the investigation and where the damage exceeds \$2,000.
- Implement an effective hours of service and strategy (See Section 17.0) to reduce fatigue related incidents as a result of turnaround activities.

3.0 Focus Areas

For the 2019 Surmont turnaround, the following areas have been chosen to put specific focus and attention on:

- Permit to Work
- Confined Space Entry
- Work at Heights
- Lifting Operations
- Process/Mechanical/Electrical Isolations
- Driving Safety
- Process Safety

- Hand and Head Injuries
- Fatigue/Heat Stress
- Shift Handover Communication Effectiveness
- Personal Safety Involvement (PSI)
- LSR Verifications
- Waste Management/Housekeeping
- Environmental Management
- Flange Management

4.0 Significant Activities

The activities of the 2019 turnaround have been grouped into the following main categories:

- Inspection Activities (Piping and Vessels).
- Tank and Vessel Cleaning and Repairs
- Fluid Storage and Transfer (Wash Fluids).
- Capital/MOC project mechanical tie-ins.
- Exchanger Bundle Replacements.

5.0 Contractors and Sub Contractors

5.1. Bridging Documents

All contractors are required to work under the ConocoPhillips Canada HSE Management System (HSEMS) while carrying out activities at the Surmont site.

All bridging exercises against ConocoPhillips and contractor HSE procedures shall be completed within existing supply chain and contractor engagement processes. Turnaround site inspections shall be conducted to ensure that contractors are meeting and/or exceeding expectations. In every case, both ConocoPhillips and the contractor shall work together to achieve desirable HSE performance.

The specific major contractors associated with the turnaround are:

MECHANICAL CONTRACTOR	Cahill
ELECTRICAL & INSTRUMENTATION	Surepoint
SCAFFOLDING	Link
INSULATION	Aluma
CRANE WORK	Myshak
GENERAL LABOUR	Centerfire
PSV	Unified
INDUSTRIAL CLEANING	Young Energy & Cascade Energy

EQUIPMENT RENTALS/TOOL CRIBS	Hertz
HSE RESOURCES/SAFETY	United Safety
VESSEL COATING	Haul
WASTE HAULING	Collective Waste
WASTE PROCESSING ON SITE	Newalta/Tervita
TEMPORARY TANK FARM	Strad
JANITORIAL SERVICES	Christina River Enterprises (CRE)
TRANSPORTATION/SHUTTLE SERVICE	First Canada/Metro
OFFSITE ACCOMODATIONS	Surmont Lodge
ONSITE TRAILERS	Alcor/Centerfire

6.0 Positive Recognition Program

Surmont intends to recognize safe work performance. A single recognition program will serve both employees and contractors during the turnaround. The turnaround management team and the contractor management team will coordinate the recognition program.

7.0 Life Saving Rules

Life Saving Rules are in place for tasks which present the greatest risk of significant injury. During the planning phase of your turnaround, you should aim to reduce the number of activities which relate to Life Savings Rules. For example, if you can reduce the probability of a fall and eliminate the need to manage fall protection for a task by installing scaffolding or eliminate the need to enter a vessel by cleaning it from the manway, every effort should be made to complete work in this manner.

Where is it not possible or not practical to eliminate work requiring the application of Life Saving Rules, hazard assessment, hazard control and compliance with Life Saving Rules Minimum Standards is critical.

The following 8 Life Saving Rules will be a focus during the 2019 Turnaround.



Work with a valid permit when required



Verify isolation before work begins



Obtain authorisation before entering a confined space



Obtain authorisation before starting ground disturbance / excavation activities



Protect yourself against a fall when working at height



Obtain authorisation before bypassing, disabling or inhibiting a safety protection device or equipment



Follow safe lifting operations and do not walk under a suspended load



Always wear your seat belt, do not use your mobile phone while driving and obey speed limits

Communicating Standards to the Workforce

CPC Representatives responsible for overseeing work which relates to a Life Saving Rule must review and ensure compliance with the Life Saving Rules Minimum Standards (verification statements). They are also responsible for communicating this information to any contractor workers involved in the task they are permitting.

Opportunities for communication/reinforcing Life Saving Rules requirements with the workforce include, but are not limited to during:

- Permitting Process
- Orientations
- job planning or tailgate
- PSI Conversations
- LSR Verification
- Leadership visits / Reliability conversations

Additional details are provided in the ConocoPhillips Life Saving Rules Minimum Requirements Document and in the flip guides handed out to site personnel.

8.0 Hazard Identification and Risk Assessment

8.1. Risk Assessments

A critical component for HSE success during turnaround execution is appropriate implementation of risk management. During the planning, preparation and execution of turnaround work and activities, risk will be managed and mitigated.

All risk assessments associated with shut down activities will be carried out in accordance with CPC Risk Management Program (CPC-ALL-HSE-PGM-127).

An overall turnaround risk register is in place.

8.2. Hazard Identification

The Turnaround Manager/Supervisor, in consultation with key members of the turnaround team, shall conduct a high level hazard assessment of all key activities to identify particular hazards relating to the work to ensure appropriate measures are in place (e.g. boundary isolation, steaming and decontamination, hot work, number of vessel entries).

The hazard assessment should also help identify any SIMOPS concerns when considering all of the work ongoing during the turnaround.

During the turnaround the CARE card system will be used to record hazards and unsafe conditions identified at site. All action items arising from hazard identification through the CARE card system will be assigned a responsible person and that person will be responsible for completing the action item and closing it out formally through the HSE department.

Contractors will be required to submit an overall HSE Plan for their individual Turnaround scope of work as well as Job Hazard Assessments (JHA) to cover their work activities.

8.3. Concurrent Work Activities Review

The Phase 2 turnaround will be supported by a The Technical Services department leading up to and during the event. Concurrent work activities will be identified as part of the planning/scheduling process and reviewed in detail with the planning team and Technical Services personnel.

8.4. Work Permits

Permits for the Phase 2 CPF and Well Pads will be prepared and issued by the Surmont Turnaround Team on behalf of the contractors, as part of the planning process and included in the work orders/packages. Part (A) will be prepared by the Turnaround Planners, or Specialist and will include the associated TJSA (reviewed by the field team). All Part (A) will be reviewed and linked to the correct Isolation Certificate by the Turnaround Operations Specialist, who will then initiate Part (B) for pre/post and turnaround work. Part (B) associated to pre-work will be reviewed and approved by the Shift Leads prior to commencement of work. The permit coordinators will have reviewed and printed the permits 3-7 days prior to work activities and make them available in the FIC for pick up by the relevant contractor. Part (B) for turnaround activities will be approved by the Turnaround Operations Specialist or Shift Lead 60 days before the turnaround. This will allow time for a dedicated Permit Coordinator to review, print

and organize all permits before the turnaround begins.

When a scope change occurs, the Permit in question becomes invalid and must be re-issued taking the hazards and mitigation strategies of the new work scope into account.

A Permit must be suspended if an emergency alarm is activated at the work site and all work must immediately stop. The alarm condition must be corrected before work activities can resume. Atmospheric re-testing within confined spaces and hot work areas must be conducted to ensure conditions have not changed, and recorded on the Permit form. If work is not resumed within 1 hour of the alarm, the original Permit must be cancelled and a new Permit issued.

No work shall take place without a Permit in place

Ensure appropriate Life Saving Rules are referenced

8.5. Field Level Risk Assessment (FLRA)

The FLRA mentioned in the above section must be completed prior to any work commencing in the plant. This assessment must cover any location specific hazards not already covered in the Work Permit, and list any relevant mitigation measures that must be in place for the work to be completed safely.

All workers involved in the task must have input into this risk assessment process and are required to sign onto the form indicating their involvement in and agreement with the resulting document.

If desired, contract company forms may be utilized as their workers are familiar with the process.

9.0 Pre Turnaround Communication

9.1. Turnaround Information

During March and April 2019 briefings will be delivered to all core staff and contractor supervision which will detail HSE expectations and reinforce the priority of safety during the turnaround.

9.2. Safety Team Awareness

Meetings will be held with CPC and contractor safety personnel one week prior to turnaround to communicate general turnaround arrangements and their roles and responsibilities.

10.0 Turnaround Orientation

10.1. General Turnaround Orientation

All staff working during the 2019 turnaround will be required to complete the Surmont HSE Orientation prior to being granted site entry.

Orientation times and location will be communicated to contractors in March 2019.

To aid in completing the Orientation efficiently, workers are required to present copies of all applicable safety tickets to the facilitator.

Tickets required are:

- H2S Alive.
- WHIMIS
- TDG if they will be carrying dangerous goods

Although not checked during the orientation, workers are required to maintain on their person any other tickets needed to perform job specific duties (ie: TDG, Confined Space Entry, Fall Arrest).

Any worker who is unable to present the applicable certifications will not be permitted to work.

11.0 HSE Communications

11.1. HSE Communications Flow

Each company participating in the turnaround should have a single point of contact that will be responsible for ensuring the flow of turnaround-related HSE information is communicated to the required individuals, both prior to and during turnaround execution. All turnaround-related information will be communicated through the positions listed below:

CPC TURNAROUND HSE	780-334-4526
CPC OPERATIONS HSE	780-334-7870
CPC ENVIRONMENTAL SPECIALIST	780-334-4509
CPC TURNAROUND WASTE COORDINATION	780-334-5968

11.2. HSE Stand Downs

HSE stand downs may be scheduled as per Turnaround Managers discretion to focus on key safety messages and give positive feedback.

11.3. Daily HSE Update

A daily HSE Share (Example provided in Appendix A) will be distributed, and is to be discussed at each daily toolbox talk. The daily information sheet will cover the following topics:

- Incidents in last 24 hours.
- Best practice recognition.
- Key activities in next 24 hours.
- General safety points and reminders.

- High risk work areas to avoid.
- CARE card summaries.
- Life Saving Rules highlights.
- Weather forecast.

Respective contractor safety representatives or supervisors shall review the daily information sheet during their respective morning meetings and toolbox talks.

11.4. Daily Pre-Start Discussions

All employees will be required to attend a daily toolbox talk to plan and review operational and HSE requirements for the day.

Supervisors/Permit Receiver will conduct individual tailgate meetings with their assigned crews at the start of each shift to discuss the following:

- Contents of the Permit to Work (PTW) and Risk Assessment for the activity.
- Daily HSE Update (Safety Alerts, Incidents/Injuries, Near misses, etc.).
- Planning for the safe and efficient undertaking of all activities.
- Providing feedback from previously raised issues/concerns turnaround.
- All meetings should include morning stretching at the end of the meeting.

11.5. Daily Safety Team Meetings

Safety advisors and coaches from all companies on site will meet during each day shift to discuss current safety issues. Any action items assigned as a result of this meeting will be tracked in an action log which will be communicated to all attendees for communications purposes.

These meetings will be held at the following time: 17:45 until 18:00.

NOTE – This time may be changed to meet turnaround requirements.

12.0 Incident Management

It is a requirement that all incidents and near misses are reported, recorded, investigated and resulting corrective actions implemented.

The responsible supervisor will notify the HSE Department and turnaround manager of an incident/near miss as soon as possible.

The turnaround manager will be responsible to immediately notify relevant ConocoPhillips senior management of any recordable injuries or environmental incidents, and any incidents that require reporting to external regulators or stakeholders.

All incidents shall be recorded and managed through ConocoPhillips IMPACT tool, by supervisors for the involved unit or area. The HSE department will assist with IMPACT entries where individual incident owners do not have electronic access. An example of forms that can be used to collect initial incident information is in the CPC Incident Reporting Guide (CPC-ALL-HSE-GUI-2115). Contractors may use their own forms to collect incident information providing it satisfies minimum requirements for subsequent entry into the IMPACT system.

The double zero spill card (Green card) can be used to document and report small non-reportable spills which can be cleaned up immediately and do not require further investigation or repair.

13.0 Inspections & Safety Walks

13.1. Personal Safety Involvement (PSI)

All personnel working at Surmont are encouraged to participate in the ConocoPhillips PSI program. Contractors will be exposed to the PSI culture during the orientation process to ensure everyone onsite understands the value of looking out for one another. PSI conversations can be used to recognize and communicate best practices. PSI learnings are communicated using CARE cards.

13.2. Permit to Work Reviews and Work Site Inspections

Permit to Work inspections and work site inspections will be conducted during the turnaround.

13.3. HSE and Leadership Visits

The ConocoPhillips managers, superintendents, supervisors, CPC safety team and contractor safety advisors will carry out daily HSE visits. The CPC CARE card will be used to capture findings.

13.4. Hazard Recognition

All personnel have a responsibility to identify and report any uncontrolled hazards by filling out a CARE card and reporting to their supervisor.

13.5. Contractor Senior Management Leadership Visits

Senior management from the contract companies will be scheduled to visit site during the turnaround and carry out leadership visits. Use CPC CARE card to capture findings.

13.6. ConocoPhillips Leadership Visits

The CPC management team will carry out daily work area visits during the turnaround. These visits will be unscheduled and will target all turnaround activities. Life Saving Rules Verifications will be an important component of these visits.

14.0 Safety Support

14.1. CPC HSE Team

Surmont HSE Specialists will be on site to support turnaround activities and:

- Be the first point of contact with contractor safety staff.

- Conduct PSI's and LSR verifications with field leadership.
- Conduct permit and LOTO reviews.
- Assist HSE Leads and HSE Directors with medical case management and incident learnings.
- Facilitate Learning on all incidents and high potential near misses.
- Direct IH (Industrial Hygiene) activities.

14.2. Safety Watch and Contract HSE Support

Contract safety watch and HSE personnel will be made available as needed during the turnaround to support the additional demand for hot work and confined space entry permit and all other turnaround activities. The safety watch / Contract HSE Support personnel will:

- Participate in conducting safety observations on site so as to identify safe and at-risk behaviours in the workplace and liaise with CPC HSE Operations regarding the findings.
- Provide guidance and services to all areas. Information includes company rules and requirements, regulations, codes of practice, industry standards and other technical guidance.
- Attend turnaround meetings, toolbox talks and pre-start safety talks.
- Liaise with contractor management, HSE personnel and employees.
- Co-ordinate and conduct monitoring of the work environment. (Safety Watch)
- Co-ordinate and assist with the compilation of HSE-related statistical information.
- Conduct analyses to determine trends and performance levels.
- Review all relevant turnaround incident investigation reports.
- Capture and report HSE lessons learned throughout the turnaround.
- Prepare reports for management review.

15.0 Emergency Preparedness and Support

15.1. Emergency Plan

Emergency preparedness and response will be carried out as per the CPC Emergency Response Plan (CPC-OLS-HSE-PLN-223).

In the event of weather related stand-downs (e.g. lightning) or a site emergency/muster, all confined space activities must cease

16.0 Medical Support

Appropriate medical support will be available for both the day and night shift as the number of people dictates under guidance from OH&S Reg. Sec.181.

The ultimate goal of the CPC management team is to ensure that all workers arrive home to their families safely at the end of the turnaround. To help aid in this goal, all injuries must be reported, treated and recorded no matter how minor they appear, to ensure that the adequate level of response is provided. All injuries are to be reported as per the incident reporting guidelines provided in the orientation process and communications guidelines.

The Surmont Site Medical Clinic will provide medical services with support from the Surmont ERT for the duration of the turnaround. Medical Staff are available via Radio Channel 1 or by calling

medical support in the event of an emergency. During turnaround, the emergency response team will provide high-angle rescue, confined space rescue, advance life-support medical response, hazmat response and firefighting capabilities. Each emergency response team consists of an ERT captain/lieutenant, two paramedic firefighters and four emergency medical technician firefighters. The Surmont medical clinic will also be operational 24 hours/day consisting of a nurse practitioner and registered nurse on each shift. The Emergency Response team will provide primary response to all site emergencies. Secondary response if required will be provided by an onsite United Safety Rescue Team. All Rescue plans for the 2019 turnaround will be developed by the on-site Emergency Response team.

In the event on-site treatment is not sufficient and further off-site treatment is required, appropriate transportation will be provided via the Surmont ERT. No person is to be transported from site without an appropriate escort, (i.e., management representative or delegate).

In the event an Emergency Medical Evacuation is required, STARS is available and the landing area is located east of the Phase 1 warehouse building. Refer to the CPC Surmont Helicopter Safety (CPC-OLS-HSE-PRC-7019) for proper procedures (At no time are materials or vehicles to be placed in any position that interferes with this paved landing area or landing/take off routes.)

STARS EMERGENCY # 1-888-888-4567

STARS SITE ID # 4340

LOCATION 5-18-083-06 W4M

17.0 Occupational Health Management

17.1. Fit for Duty and Drug & Alcohol Testing

All employees and contractors are required to comply with the CPC Surmont Fit for Duty Policy (CPC-OLS-HP-POL-7001).

All employees and contractors are required to notify their supervisor of any pre-existing medical conditions that may require special consideration.

17.2. Fatigue Management

Fatigue is a contributing factor to human error and incidents. The following controls will be in place to prevent the effects of fatigue in alignment with the Alberta Employment Standards Code.

- Breaks will be provided during each shift; rotations will be planned to ensure that personnel do not exceed 14 consecutive day/night shifts.

- Where possible, repetitive jobs will be rotated to reduce levels of fatigue. Break stations and water will be provided on site.
- Ensuring personnel are informed of the risks associated with fatigue, and how to participate in controlling the risks.
- Undue noise from personnel, equipment or vehicles will not be tolerated near the site camp.

18.0 Health Surveillance

An Industrial Hygiene sampling/testing program is established in advance of any turnaround based on anticipated/foreseeable hazards, and any lessons learned from previous plant outages. The program design is such that it will complement the existing IH program sampling.

Ambient monitoring/sampling is conducted as part of plant turnaround and startup activities. Monitoring/sampling during the maintenance window is focused mainly on execution activities and ensuring that appropriate PPE, engineering, and administrative controls are being applied to safeguard health.

18.1. Benzene Health Surveillance

Testing will be completed on tanks, vessels and associated piping prior to entry. Testing will also be completed during the initial stages of the turnaround including vessel breaks. Should contamination be detected, all personnel will be required to follow the CPC Benzene Protocols in (CPC-ALL-HSE-PGM-155).

18.2. Naturally Occurring Radioactive Materials (NORMS)

Testing will be completed on the vessels and associated piping prior to the turnaround commencing. Testing will also be completed during the initial stages of the turnaround including vessel breaks.

Should contamination be detected, all personnel will be required to follow the CPC Norms protocols utilizing the correct PPE and decontamination procedures.

18.3. Hearing Protection/Surveillance

All requirements for hearing protection will comply with CPC Hearing Conservation Programme (ALL-HSE-PGM-SOP-140).

Noise level testing will be conducted on an as-needed basis to determine hearing protection requirements during the turnaround. An example of this would be testing noise levels while sandblasting in vessels.

18.4. Refractory Ceramic Fiber/Asbestos

Refractory Ceramic Fiber and Asbestos Management: Asbestos has not been identified as a risk in the 2019 work scope.

Any handling (installation, repair, or removal) of refractory ceramic fiber insulation materials shall be conducted as per CPC Industrial Hygiene Program (CPC-ALL-HSE-PGM-155) and the CPC Refractory Ceramic Fiber Procedure OLS-HSE-PRC-5062

19.0 Safe Work Procedures

19.1. Hydrogen Sulfide (H₂S)

The presence of and potential exposure to H₂S is possible due to the fact that Surmont is a sour facility. All employees and contractors must understand the hazards of hydrogen sulfide and take appropriate precautions to prevent exposure.

All workers will require H₂S Alive. Refer to CPC Hydrogen Sulfide (H₂S) (CPC-ALL-HSE-PRC-176).

19.2. First Break Process

The CPC First Break Procedure (CPC-OLS-OPS-PRC-7454) will be followed.

19.3. PSV Removal

Where PSV outlets connect to a common flare header, outlet flanges to the header shall be blinded while the PSV is removed.

19.4. Barriers and Safety Signs

Safety signs and temporary barriers will be used during the turnaround. Contract companies are required to supply any signage that may be required due to usage of their equipment.

19.5. Danger Barricading

Barricading should be used to establish a danger zone where a high-risk hazard exists. Red danger tape will be tagged with the nature of the hazard and the name and contract information for the person who installed the flagging.

Appropriate signage and/or tagging shall be employed in conjunction with the barricading to warn personnel of specific hazards.

Access: Red flagged danger zones are designated “No go” areas and under no circumstances is a person to enter an area designated as a danger zone.

19.6. Caution Barricading

Barricading should be used to establish a caution zone where a hazard exists and certain safety precautions must be used.

Black & yellow hazard tape will be tagged with the nature of the hazard and the name and contract information for the person who installed the flagging.

Appropriate signage and/or tagging should be employed in conjunction with the barricading to warn personnel of specific hazards.

Caution – Hazard tags should be placed at all potential entry points.

Access: Personnel must review the hazard tag before entering the area.

19.7. Radiation Barricading and Nuclear Gauges

Barricading intended to provide warning that a radiation hazard exists and no unauthorized persons may enter the area.

The only persons allowed inside are the radiographers who are conducting the inspection. Radiation safety barricading and trefoil signage will be used when conducting radiography activities.

Access: Access is strictly prohibited to persons outside of the radiography team carrying out the inspection.

Confined Space Entry with a Nuclear Gauge

The confined space entry is to be performed in accordance with written procedures acceptable to the Canadian Nuclear Safety Commission (CNSC) or a person authorized by the CNSC. In addition to the requirements above, the following control measures must be taken for all confined spaces fitted with radiation devices.

- Prior to entry, nuclear gauges must be identified, properly retracted into their respective shield, and locked out.
- The dose rate in the vessel must be measured near the vicinity of the nuclear gauge and
- recorded on the permit by a qualified person.
- If the dose rate within the vessel is greater than 5.0 $\mu\text{Sv/hr}$, do not enter the vessel and
- contact the Radiation Safety Officer (RSO) for further instructions.
- Workers entering the confined space must be aware of the nuclear devices and the dose rate.
- The worker's time in the confined space must be recorded on the permit.
- Radiation Safety Officers must obtain a copy of the permit.

19.8. Elevated Work/Fall Protection

Employees and contractors must use or wear fall protection equipment as per CPC Fall Protection (CPC-ALL-HSE-PRC-188) at temporary or permanent work areas if a worker could fall:

- 3.0 metres or more.
- Less than 3 metres when there is a possibility that a worker could sustain injuries.
- More than 1.2 metres but less than 3 metres, in the case of a permanent work area where guardrails or other similar means of fall or travel restraint have not been provided.

A CPC Site Specific Fall Protection Plan (CPC-ALL-HSE-FRM-2016) must be prepared for and accompany all work permits which involve fall protection equipment utilization, including mobile equipment usage.

During the turnaround the facility will be densely populated with workers creating the potential for injury from dropped objects. Plan work at heights to ensure tools and materials are controlled in order to prevent dropped objects:

- Where practical use tool lanyards.

- Place small tools, screws, bolts etc. in canvas bags.
- Secure loose items at heights with proper lashing.
- Do not use altered tools.
- Inspect tools to ensure that they will not come apart during use (e.g. hammer heads).
- Secure tools in a pouch or tool belt.
- Secure bull pins or wedges to prevent falling if they get dislodged.
- Maintain adequate communication when passing tools and materials.

19.9. Anchor Points

Tie off lanyards will be secured above the point of operation to an anchorage or structural member capable of supporting a minimum dead weight of 5,000 pounds.

Pipe as Anchor Points: 3-inch NPS metal pipe may be used as an anchor point if in good condition. The pipe length must be continuous for at least two supports on either side of the attachment. The span between pipe supports must not be greater than 6 metres for any pipe size.

Structural Steel as Anchor Points: 2½" x 2½" x ⅜" angle – span must be 6 metres or less.

19.10. One Hundred Percent Tie-Off Requirement

This requires anyone working 3 metres above a temporary working surface to have one of two lanyards secured to an anchor point at all times. The purpose of two lanyards is to allow travel and relocation while being protected from a fall.

If a contractor has a more stringent tie-off requirement (i.e. 2 metre rule), then the more stringent requirement will apply to them.

19.11. Working from Ladders

When working from portable ladders where the employee's feet are 3 metres above the next lower level, fall protection equipment shall be used – this does not apply when only moving up or down the portable ladder.

All portable ladders must be secured at the top during use and placed in a secure area when not in use. Portable ladders shall be non-conductive as per CPC Electrical Work (CPC-ALL-HSE-PRC-167).

19.12. Equipment Placement and Usage

The turnaround team will be responsible for placement and arrangement of temporary tanks, cranes, and all equipment that will be used for completion of work in their assigned areas.

Trailers and equipment brought into the plant will follow CPC Onshore Building Design and Siting for Blast Overpressures (CPMS-FAC-ES-003) for proper and safe location.

All equipment that is brought onto the site for the turnaround, either owned or rental, must meet all standards with inspections conducted prior to use. Inspections must be made available to CPC

upon request. Any equipment that does not meet CPC and government standards must be immediately removed from site with a CARE card completed and submitted to CPC HSE.

19.13. Hot Work

All hot work activities will require active gas monitoring (with all readings recorded on the active permit/FLRA) and all welding operations will require shielding and a spark watch. The requirement for spark/flash shielding is in effect for both interior and exterior applications and the usage of building walls is not permitted as spark control. Follow CPC Hot Work (CPC-ALL-HSE-PRC-175).

19.14. Confined/Restricted Space

Confined space entry plans must be obtained, understood and followed prior to entry into any confined space on the ConocoPhillips site.

Workers required to enter a confined space or perform the duties of a confined space monitor must be competent and must possess a valid confined space card indicating their name and date of course.

Restricted spaces are generally work areas in which the only hazard is the difficulty of getting into or out of the space and no atmospheric hazards. Note: a restricted space can become a confined space if conditions or work practices change.

Please see CPC Confined Space Entry (CPC-ALL-HSE-PRC-165) for additional information.

19.15. Safety Data Sheets

During the turnaround there may be a number of new chemicals and hazardous materials brought on site; these must be approved by CPC HSE before being brought to site. All products shall be delivered with Safety Data Sheets (SDS) or they will not be allowed on site. Safety data sheets must be present with the work permit at each job location and reviewed prior to work commencing.

19.16. Personal Protective Equipment

All staff working at Surmont shall meet the PPE requirements as noted in CPC Personal Protective Equipment (ALL-HSE-PRC-643). A turnaround specific PPE guide has been prepared outlining PPE requirements for turnaround work activities and will be included in each work package.

all CPC employees, full time contractors, and service providers are required to wear traction / anti-slip footwear with tungsten carbide studs as part of the mandatory PPE when performing work or walking based on field level hazard assessments.

19.17. Personal Gas Monitors

During the turnaround, personal gas monitors (4 head – H2S, LEL, O2 and CO) must be worn by all personnel per CPC Gas Detection (CPC-ALL-HSE-PRC-170).

19.18. Scaffolding

Only the onsite scaffolding contractor can assemble, modify or remove scaffolding.

All assembled scaffolding will be tagged with either a yellow tag (safe to use – look at the listed hazards on the tag) or a red tag indicating the scaffold is unsafe for use. These status tags will be located at all access points to the scaffolding.

Should a tag be missing, the scaffolding must not be used and a CPC representative should be immediately notified.

The scaffolding will be inspected on regular intervals but it is the responsibility of the user to ensure the tag is checked before use.

Modifications to scaffolding by personnel other than certified scaffolders is NOT permitted and personnel will be removed from site.

19.19. Smoking

Smoking including e-cigarettes is PROHIBITED on all CPC leases and work sites except in designated smoking areas. All designated smoking areas are identified on the site safety plot plan.

Strike-anywhere matches and single-action lighters are strictly forbidden. Safety matches that light only on the container in which they are sold, are permitted on CPC property.

Cigarette butts are to go in specific butt containers.

19.20. Vehicle Operations

All vehicles operated on CPC property must be done so following all site polices as mentioned during the site orientation.

It is important to note that the turnaround activities will result in a significant increase in the amount of foot traffic within the facility and vehicle use should be limited to essential traffic only.

Spotters will also be required when backing any equipment within the facility and when backing any vehicle larger than a 1 ton or any vehicle having restricted visibility.

Speed limits must be strictly adhered to on CPC roads to the Surmont site (add speed limit map in appendix). The maximum speed limit on site in all locations including the camp when driving past workers is 15 km/hr.

All vehicles will use a back-up beeper or double horn honk to indicate backups.

Vehicles are not to use engine retarder (Jake) brakes due to the camp on site.

19.21. Lifting Operations

All lifting operations will follow the CPC Lifting Devices and Rigging procedure ([CPC-ALL-HSE-PRC-178](#)). Critical lift plans (CPC-ALL-HSE-FRM-2129 or contractor equivalent) are required for lifts meeting any of the following critical lift criteria:

- lift exceeding 75% of the crane's rated capacity, as shown on the load charts for the crane configuration to be used;
- lift of a person in a work platform suspended by a crane;
- lift of a load over or between energized, high voltage electrical conductors;

- lift over live process equipment or piping.

Critical lift plans must include the following information at a minimum:

- rigging details;
- wind speed limitations;
- maximum hoist line speed;
- maximum crane travel speed, if applicable;
- load distribution; and
- the need for and position of signalers.

Written critical lift plans must be completed by a qualified person and discussed with all workers at a pre-job safety meeting. This meeting must be repeated whenever there is a change in the people or equipment involved in the critical lift.

20.0 Environmental

ConocoPhillips has the corporate goal of no recordable spills which is part of our Journey to Zero. Surmont has raised the bar with a goal of no spills, no matter the volume. This forms the cornerstone of our double zero goal – no spills and no injuries, period.

The environment must be considered as part of all pre-job planning meetings with appropriate mitigation measures documented. Should further clarification or guidance be required, our environmental specialist noted in section 10.1 Communications Flow can be contacted.

20.1. Spills

To achieve zero spills during turnaround, all work will be planned to identify and anticipate where spills may occur. Appropriate hoarding, containment or other measures must be used to prevent spills from reaching the ground. Use the work permit and FLRA card process to ID where spill risks exist.

CPC will provide additional spill containment, hoarding or tarps where required to prevent spill events. There will be various containment depots with tarps, soaker pads and spill kits located throughout the plant for the duration of the turnaround.

During the turnaround, released fluids or materials will only be considered a “spill” if they reach the ground. Releases to containment will not be considered spills. Ensure that spill containments are placed under hose connections when transferring fluid to prevent spills.

Hoses used during the turnaround must be fit for service, tested, and labeled with test date, service and pressure rating with lockable camlok ears.

20.2. Housekeeping

Good housekeeping habits play a large role in safety/environmental excellence. To ensure health, safety and environmental success during the turnaround, it is of vital importance that workers don't delay cleanup efforts until the end of the job.

Continuous area monitoring and cleanup is crucial in providing a safe work place. One paper cup or one earplug on the ground is unacceptable.

- All containers must be stored properly and labelled correctly.
- Ensure that all trash is disposed of properly and immediately.
- Leave your work area clean each day.
- Store construction materials in a central location while performing work.
- Place waste materials in proper bins which are clearly marked.

20.3. Waste Management

All site waste management will follow current CPC processes (CPC-ALL-HSE-PGM-158) and proper waste management and waste segregation must be included in the task assessment. It is of the utmost importance that DOW (Dangerous oilfield waste) and non-DOW waste are kept separated and properly disposed of. Should clarification be required, the CPC environmental specialist can be contacted for guidance.

All waste must be properly segregated and stored in appropriate containment. All wastes will be manifested by CPC.

The Waste Disposal strategy during the turnaround will be the same as for normal operations. CPC has contracts with a number of third party service providers for waste management and they will deal (ultimately) with all turnaround waste streams.

Consideration will be given in pre-planning to ascertain the amount and type of potential turnaround waste to help ensure waste disposal issues can be dealt with as efficiently and economically as possible.

All waste streams requiring disposal will be coordinated through the Turnaround Waste Coordinators.

The main waste disposal sites for the 2019 turnaround include:

Oilfield Waste: Tervita Hughenden	16-33-040-07W4M	(780) 856-2526
Tervita Elk Point	03-15-055-06W4M	(780) 724-4333
Lindbergh Cavern	05-26-056-05W4M	(780) 724-3002
General Waste: Janvier Landfill	S1/2-03-081-06W4M	(780) 792-8153

Special waste streams that require characterization and classification must be discussed with the environmental specialist prior to the turnaround to ensure proper measures are in place prior to execution of the turnaround.

21.0 Wildlife

All wildlife sightings within the area must be reported to the CPC HSE team for tracking purposes.

In the event that AESRD needs to be notified of a wildlife event, the CPC Environmental Specialist will establish contact. It is recommended that all vehicle windows, camp doors and lunchroom doors be closed to prevent wildlife from entering, and a requirement that all garbage containers be kept firmly sealed to aid in the prevention of wildlife occurrences.

All large garbage containers brought to site for the turnaround will be wildlife proof. Under no circumstances shall personnel approach or feed wildlife.

22.0 Weather and Other Natural Events

22.1. Lightning

In the event lightning moves into the area, turnaround management will make the call via radio for workers to stop work and seek shelter and will be executed based on the Surmont Lightning Stand down process.

If there is adverse weather in the area or we receive a weather alert, ConocoPhillips personnel will monitor and evaluate conditions. If lightning is detected, ConocoPhillips Personnel will evaluate conditions using the Flash / Bang technique adopted from the National Lightning Safety Institute to help measure storm proximity.

FLASH/BANG (F/B) Technique states that for every count of five seconds from the time of seeing the lightning strike to hearing the associated thunder, the lightning is one mile away.

Example: F/B of 10 = 2 miles; F/B of 20 = 4 miles etc.

When F/B is 30 seconds (6 miles) workers must suspend:

crane work and hoisting

elevated work activities

confined space entries

pond work or work around the ponds

outside work (work that is taking place away from grounded buildings or outside of a vehicle).

Walking at ground level under a pipe rack, moving to/from buildings and/or vehicles "is" permissible. Work activities being carried out in grounded locations (i.e. within buildings) will continue. All notifications executing the lightning Protocol for the Central processing facility (CPF) will come from ERT via radio.

Wellpads or remote areas can implement a localized lightning protocol which will come from the Shift Supervisor or designate for the specific area. Notifications will be via phone intercom and Surmont All Call radio channel.

If lightning protocol has not been activated by the ERT, work groups utilizing the F/B technique can review their work plans and take appropriate action.

The “all-clear” will be communicated by the ERT for the CPF, and the Shift Supervisor or delegate for Wellpads and remote areas via phone intercom and Surmont All Call radio channel.

After the “All-Clear” has been communicated, all work may re-commence after reviewing your FLHA.


If there is an incident during the stand down (i.e., process safety event, property damage, fire or injury), it will be communicated via site alarms/radio or phone intercom, and all permitted work will be re-assessed as required and re-issued.

22.2. Forest Fires

Should a forest fire occur, the Surmont Emergency Response plan will be activated which will guide all actions taken. Upon arrival at the designated location, further direction will be given as per the Emergency Response Plan.

Appendix A – “Example” Daily Communication Sheet

CPC Daily Safety Topic
May 24th 2018



Hot Weather Preparedness


Hot and dry weather in the Surmont region will introduce risks such as Heat Stress, Sun exposure, Dust, and Smoke exposure from wild fires. Below are some tips to help mitigate these risks.

Heat Stress:
Occurs when the body continues to gain heat faster than it can get rid of it resulting in the body's temperature increasing:

- Drink lots of water, even if not thirsty
- Avoid caffeine
- Alternate work and rest breaks, with longer breaks in cooler areas
- Keep an eye on your coworkers. Use a buddy system
- Check your urine color for signs of dehydration (Clear to light yellow is good)
- Utilize sun screen

Dust & Smoke exposure


- Maintain lower driving speeds especially when passing workers on the side of roads.
- Smoke in designated smoking areas and do not dispose of cigarette butts out vehicle windows
- Keep windows closed in vehicles and buildings to minimize smoke and dust particulates.
- N95 dust masks are available at the IPSC. A simple N95 disposable mask will cut the level of smoke pollution being inhaled by 90%, but the wearer must be clean shaven.
- Individuals with medical respiratory concerns should communicate with their supervisor and the Surmont medical clinic to ensure proper care and planning takes place.



It was 2 short years ago when the Surmont Site was evacuated and when it happened, it happened very quickly. With wildfire season upon us again, here is a refresher on evacuation preparedness:

- Locate your personal “Go Bag” (Should contain Wallet, Passport, ID, Keys, Medication, etc.). Keep these items ready in a consistent location in your room so that you can “Grab and Go” in the event the emergency situation does not permit re-entry into the SRR.
- Ensure you have your electronic room key card and follow existing SRR evacuation protocols.


Remain calm at all times, refrain from talking and listen for updates over the PA system.







Keep your fuel level over ¾ at all times.

With our smaller population, the primary transportation in the case of an evacuation will be in pick up trucks. Make it a habit to always keep your vehicle fueled.

Driving North, the closest fuel station in Anzac is 34km's away and driving South the next closest station is 222km's away.



WILDFIRE DANGER EXTREME

<p>Wed Evening <small>Sunny</small></p>  <p>27°</p>	<p>Wed Overnight <small>Clear</small></p>  <p>16°</p>	<p>Thu Morning <small>Mainly sunny</small></p>  <p>20°</p>	<p>Thu Afternoon <small>A mix of sun and clouds</small></p>  <p>28°</p>
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SIMOPS AREAS

Pad 262-1 Pad 262-3
Pad 263-1 Pad 264-3
New* Pad 262-2

Appendix B – CARE Card

ConocoPhillips Canada Oil Sands
Operations Observation Card

Date: / / Time: :

First Name: Last Name:

Job Type: Company Code: Site Code: Group Code:

Supervisor First Name: Supervisor Last Name:

ASA PFI Near Miss Unsafe Condition / Hazard

USE not (S) Safe / (AR) At Risk

1.0 S AR BODY POSITION

1.1 Line of Fire

1.2 Pinch Points

1.3 Eyes on Task / Hand

1.4 Ascending / Descending

2.0 S AR BODY USE / ERGONOMICS

2.1 Lifting / Lowering

2.2 Hand Placement

2.3 Pushing / Pulling

2.4 Over Exertion

2.5 Jumping

3.0 Y N PROCEDURES

3.1 Lockout - Tagout

3.2 Permits

3.3 P/NA/USA #

3.4 A Potential Energy Risk

3.5 Proper Certification

3.6 Lease Entrance Checkin

3.7 Known / Understood

3.8 Followed

3.9 Adequate

4.0 S AR PPE

4.1 Head

4.2 Eyes / Face

4.3 Hearing

4.4 Respiratory

4.5 Hand

4.6 Body Protection

4.7 Fall

4.8 Foot

4.9 Improper PPE

4.10 Personal Monitors

5.0 S AR ENVIRONMENT

5.1 Walking and Working Surfaces

5.2 Housekeeping

5.3 Atmosphere

5.4 Lighting

5.5 Industrial Hygiene

5.6 Wind

5.7 Ignition Source

5.8 Spill

5.9 Confined Space

5.10 Lease Conditions

5.11 Weather

5.12 Roads

5.13 Temperature

5.14 Wildlife

6.0 S AR CONDITIONS

6.1 Drropped Objects

6.2 Heights

6.3 Excavations

6.4 Slip / Trip Hazards

6.5 Lighting

FORM ID 1013442

S AR CONDITIONS (Cont.)

6.6 Accommodations

6.7 Signage

6.8 Stairs / Ladders

6.9 Handrails

6.10 Walkways

7.0 S AR TOOLS AND EQUIPMENT

7.1 Lifting

7.2 Rigging

7.3 Welding

7.4 Mobile Equipment

7.5 Catwalk / Pipetracks

7.6 Pump / Tank

7.7 Slings / Shackles

7.8 Electrical / Grounding

7.9 Forklift / Man Lift

7.10 Hand Tools

7.11 Hoses / Couplings

7.12 Radios

S AR TOOLS AND EQUIPMENT

7.13 Guarding

7.14 Right Tool for the Job

7.16 Process Equipment #

8.0 S AR BEHAVIOR

8.1 Complacency

8.2 Rushing

8.3 Fatigue

9.0 S AR OTHER ISSUES

9.1 Jewelry

9.2 Hivertex

9.3 Facial Hair

9.4 Non-Fire Retardant Clothing

9.5 Process Safety

10.0 S AR VEHICLES

10.1 Seat belts

10.2 Speed

10.3 Oversteering

10.4 Phone / Radio

10.5 Maintenance

10.6 Driving Behaviour

Feedback Given Yes No

Ret Code:

FORM ID 1013442

Observation Notes - Comments:

Action Required Yes No

Action Taken Yes No

Expected Completion Date: / / Location:

To be completed by: First Name: Last Name:

Job Type Codes

01 Access / Egress

03 Confined Space

06 Insulating / Edges / Cutting

07 Fluid Transfer

09 Electrical / Instrumentation Work

10 Excavations / Ground Disturbance

11 Hand Tools

12 Heavy Equipment / Earthworks

13 Hygiene

14 Lifting & Rigging

15 LULU Works

16 Manual Handling

17 Pneumatic Tools

18 Permit to Work

19 Power Tools

20 Reclamation

21 Sampling

22 Road Safety

23 Steel Assembly

25 Scaffolding

26 Security

27 Snow Removal

28 Supervision

29 Survey

30 Equipment (Lift) Loading

31 Waste Management

32 Welding / Grinding / Cutting

33 Working @ Heights

34 Transportation

35 Hydrovac

36 Pile Driving

37 Hydrotesting

38 Other

Site Codes

PF1 Central Processing Facility S1

PF2 Central Processing Facility S2

Site Codes (Cont.)

PIL Pilot Plant

PD1 Pad 101

PD2 Pad 102

PD3 Pad 103

PD4 Pad 104

SOF Summit Office

SWH Summit Warehouse

DOT Summit Other

S2P Summit 2 Pad

Company Codes

18 APE

02 Centurion

04 Conoco Phillips

19 KBR

05 Flint Fluid

06 HRF Int

20 JSK

07 Link

10 Pronghorn

11 Quinn

12 Sancon

14 Tarpon

15 United

16 VBRIZ

17 Other

Group Code

101 Construction

102 Operations

103 Pre-Ops

104 Maintenance

105 Turnaround

106 Dabottomcock

107 Abandonment

108 Other

Observation Card Instruction - Instructions for filling out card

A. Handwriting Details

HANDWRITING DETAILS

Print in FULL CAPS. PRINT CLEARLY inside the dotted squares.

NOTE: Fill in the circles completely using ink. Never use pencil.

USE not (S) Safe / (AR) At Risk

If these details are not followed, incorrect entries will not be accepted.

B. Follow up / Action Required Indicate if action was needed. Make sure your supervisor is notified if action is needed!

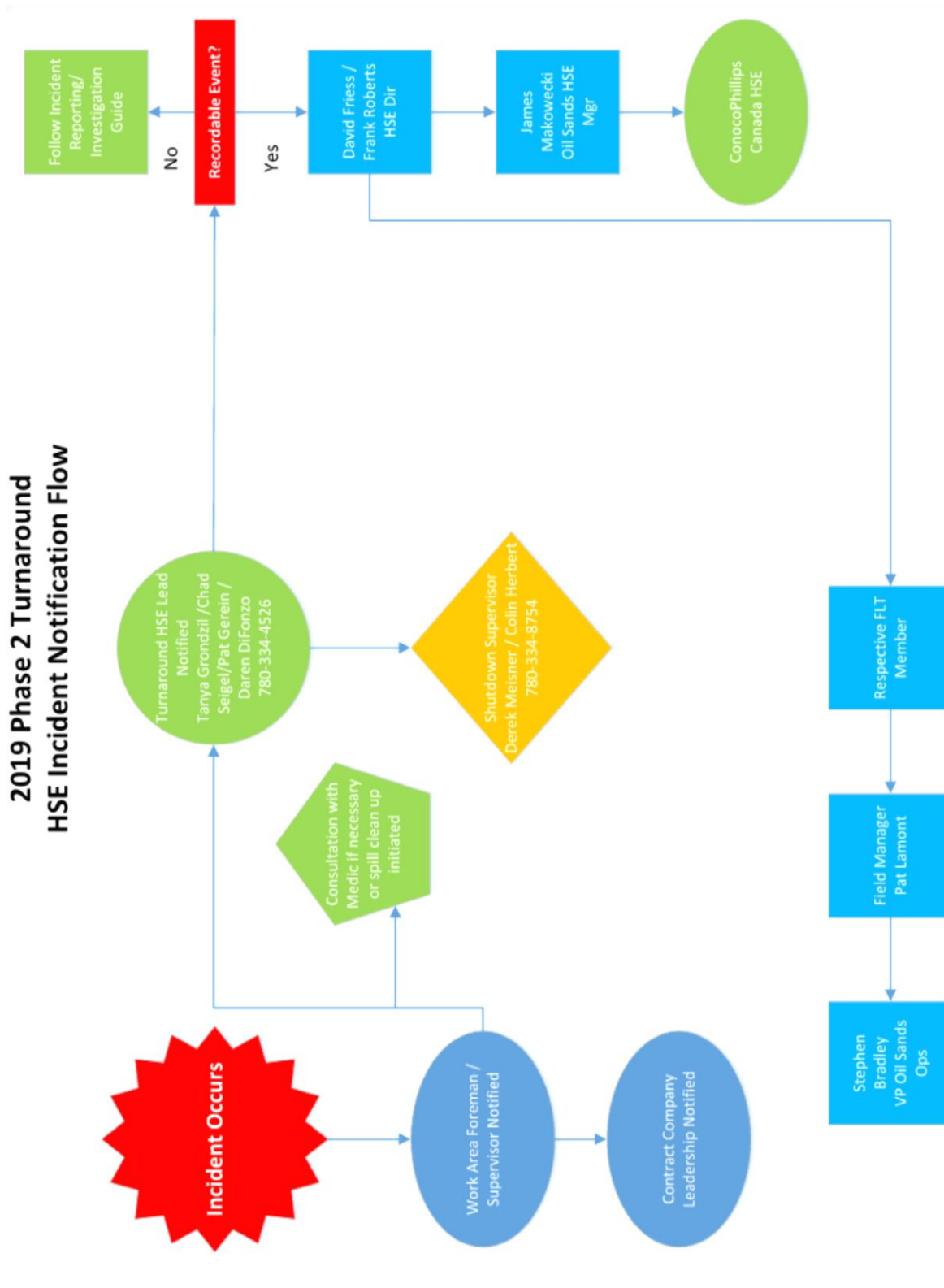
C. Behavior / Condition Reference List the section, or sub-section number of the at risk behavior your comment is about. Please print clearly in the dotted box. IE:

Section 1.1 Line of fire = : : :

Section 5.14 Temperature = : : :

Print clearly any comment you have in the sections provided.

Appendix C – Incident Reporting Flowchart



23.0 References

Bypassing Safety Turnaround Devices	CPC-ALL-HSE-PRC-183
Benzene Protocols	CPC-ALL-HSE-PGM-155
Chemical Protective Clothing	CPC-ALL-HSE-PRC-141
Confined Space Entry	CPC-ALL-HSE-PRC-165
Confined Space Entry Checklist	CPC-ALL-HSE-FRM-2033
Confined Space Entry Rescue Planning Form	CPC-ALL-HSE-FRM-2034
Electrical Work	CPC-ALL-HSE-PRC-167
Emergency Response Plan	CPC-OLS-HSE-PLN-223
Fall Protection	CPC-ALL-HSE-PRC-188
Fall Protection Plan	CPC-ALL-HSE-FRM-2016
First Break Procedure	CPC-OLS-OPS-PRC-7454
Gas Detection	CPC-ALL-HSE-PRC-170
Hearing Conservation Programme	ALL-HSE-PGM-SOP-140
Hot Tap Form B – Hot Tap Checklist	CPC-ALL-HSE-FRM-2041
Hot Tapping	CPC-ALL-HSE-PRC-216
Hot Work	CPC-ALL-HSE-PRC-175
Hot Work	CPC-ALL-HSE-PRC-175
HSE Orientation for Visitors and Workers	CPC-ALL-HSE-MAN-602
Hydrogen Sulphide (H2S)	CPC-ALL-HSE-PRC-176
Incident Reporting Guide	CPC-ALL-HSE-GUI-2115
Industrial Hygiene Program	CPC-ALL-HSE-PGM-155
Life Saving Rules Minimum Requirements Document	ConocoPhillips Life Saving Rules Minimum Requirements Document
Lifting Devices and Rigging	CPC-ALL-HSE-PRC-178
Lock Box Register	CPC-OLS-OPS-FRM-7006
Lockout/Tagout	CPC-ALL-HSE-PRC-179
LOTO Energy Isolation Register	CPC-OLS-OPS-FRM-7005

LOTO Modification Approval Form	CPC-OLS-OPS-FRM-7007
LOTO Personal Lock Removal Authorization Form	CPC-ALL-HSE-FRM-7008
Oil Sands Back to Back Etiquette Recommendations	CPC-OLS-HP-GUI-7000
Onshore Building Design and Siting for Blast Overpressures	CPMS-FAC-ES-003
Personal Protective Equipment	ALL-HSE-PRC-643
Positive Isolation (Blinding/Blanking)	CPC-ALL-HSE-PRC-181
Pre Job Hazard Assessment	CPC-ALL-HSE-PRC-387
PJHA Form	ALL-HSE-FRM-2105
Product Handling & Storage	CPC-ALL-HSE-PRC-161
Purging	CPC-ALL-HSE-PRC-182
Risk Management Program	CPC-ALL-HSE-PGM-127
Spill Prevention and Response	CPC-ALL-HSE-PRC-160
Surmont Fit for Duty Policy	CPC-OLS-HP-POL-7001
Surmont Helicopter Safety	CPC-OLS-HSE-PRC-7019
Surmont Lightning Protocol	Lightning Protocol Surmont Operations
Surmont Lockout and Tagout	CPC-OLS-OPS-PRC-7072
Surmont Site Access Policy	CPC-OLS-LM-POL-7002
Waste Management	CPC-ALL-HSE-PGM-158
Workplace Hazardous Material Information System (WHMIS)	CPC-ALL-HSE-PRC-153

24.0 Document Retention

Records must be retained in accordance with ConocoPhillips' Document Retention Schedule.

Record	Owner	Classification	Retention
Hazard Assessments	BUs or Functional Departments as Applicable	HE11 - CA	Event

Note: Contractors must retain procedure specific records.

Appendix D – Revision Record

Page#	January 11, 2015	Previous Information	Risk Assessment
	Developed for initial use		