



When to seek medical clinic attention 2

Notification 3

 Notification requirements 3

 Risk ranking events 5

 Requirements for creating events in Intelex 6

 Injury/Illness classification and re-classification 7

Investigation 8

 Preserve evidence and secure area 8

 Investigation requirements 8

 Action plan tracking 10

Links/Reference Materials 11

Purpose

This document provides COPA requirements to ensure:

- HSE events are reported
- Notifications are made
- Events are risk ranked and tracked in Intelex
- Investigations are completed in a timely manner
- Resulting action plans are tracked to closure
- [Communication of learnings are made \(OTLs, PENs, etc.\)](#)

Scope

The following is in scope and out of scope for this document.

In scope	Out of scope
<ul style="list-style-type: none"> • Non-conformances • HSE Events (Operational or Non-Operational) • Business interruptions • Near misses 	<ul style="list-style-type: none"> • Regulatory spill reporting • Government investigations and enforcement



NOTE: [Near Miss](#) – event with no actual consequences but having the potential to result in fire, injury, property damage, process upset, spill, release or other failure.

Authorized User

The authorized user of these requirements:

- Understands COPA expectation to report all incidents and near misses
- [All personnel in the AK BU](#)



When to seek medical clinic attention

Required medical clinic visits

Injured workers are required to visit the medical clinic for the following:

Puncture wounds, abrasions, cuts, or burns	<ul style="list-style-type: none"> • That fully penetrate the skin • That expose blood or are contaminated • All high-pressure injection wounds
Eye or inner ear injury	<ul style="list-style-type: none"> • Any contamination with debris or injury
Soft tissue injuries	<ul style="list-style-type: none"> • Strains or sprains
Other	<ul style="list-style-type: none"> • Frostbite • Contagious illness • Chest pain • Industrial hygiene exposure
Trauma	<ul style="list-style-type: none"> • Blow to the head, especially accompanied by dizziness, disorientation, or loss of consciousness • Impact to body from slip, trip, fall or from flying object that may cause a bruise
Worker or Supervisor discretion	<ul style="list-style-type: none"> • A worker may seek professional medical advice if they feel it is required • Supervisors have discretion to require a worker to visit medical clinic for superficial abrasions or superficial injuries



NOTE: For injuries occurring after clinic hours, contact Security.



Notification

Notification requirements

Events requiring notification

The following events/near misses require notification to supervisor as soon as possible:

Health	Safety	Environmental
<ul style="list-style-type: none"> IH exposure Standard threshold shift Radiation boundary breach 	<ul style="list-style-type: none"> Injuries Motor Vehicle Incidents Fire 	<ul style="list-style-type: none"> All spills See additional items under Community
Business impacts	Process Safety Events	Community
<ul style="list-style-type: none"> Business Interruptions Unplanned Evacuations Shelter in place mandate Public Relations Incident 	<ul style="list-style-type: none"> Tier 1, 2 and 3 PSE Near misses 	<ul style="list-style-type: none"> Tundra disturbance Wildlife encounter Excess water withdrawals Notice of Violation (NOV) Permit non-compliance Non-conformance Excess emissions

Notify Security

Immediately notify Security for any of the following events:

Safety	Environmental	Community
<ul style="list-style-type: none"> Motor vehicle incident Any event requiring Emergency Services 	<ul style="list-style-type: none"> Spills 	<ul style="list-style-type: none"> Wildlife encounter

Verbal notification chain

Verbal notifications must be made after an event:

Contractors using Subcontractors	Report to COPA supervisor and Contractor Supervisor
Contractor Supervisors	Report to COPA First Line Supervisor
COPA Supervisors	Report event to next level of supervision including HSE Dept. <ul style="list-style-type: none"> If COPA Supervisor is not readily available, contact another person in the COPA hierarchy of supervision.

[Drill Site Operator](#) must be notified of any drill site event outside of rig operational control.



Spill notification form

Security must complete a [spill report form](#) and inform Field Environmental Coordinator upon notification of a spill.

Field Environmental Coordinator (FEC) evaluates spill report to determine if it is a PSE, Agency Reportable, or [PSF](#) learning value and requires Intelex entry.

Amputation, eye loss, or hospitalization notifications

Amputation, loss of eye, or hospitalization require additional notifications:

HSE Director must notify

- AKOSH within 8-hours
- DOT within 1-hour if the hospitalization involves a confirmed gas release or pipeline failure
- COPA Legal

Notifications required for occupational fatalities

Multiple notifications are required for occupational fatalities:

Supervisor must immediately notify

- Applicable HSE Director and COPA Management.

HSE Director must immediately notify

- NSB Public Safety Officer for North Slope operations
- Alaska State Troopers
- State Medical Examiner for approval prior to moving body
- AKOSH within 8-hours
- BLM within 24-hours if on BLM lease

Anchorage Safety & Health Director

- COP Crisis Management Team (CMT)
- COPA Legal, to participate in investigation



NOTE: Non-occupational fatalities are covered in the Death or Serious Injury Response Process section of the COPA Emergency Response Plan (ERP)

Notification of regulatory NOVs

Communicate NOVs up management chain to the responsible Vice President.

HSE Director

- **Forward** copy of NOV to HSE Manager and COPA Legal
- **Ensure** NOV is reported in ConocoPhillips Quarterly Environmental Measures Report

HSE Admin

- **Validate** Intelex entry no later than the 10th of the month



Notify COPA Legal

HSE Director must notify COPA Legal and include in investigation for:

Injury	<ul style="list-style-type: none"> Any requiring overnight hospitalization and treatment
Industrial hygiene events	<ul style="list-style-type: none"> Industrial Hygiene (IH) Exposure Incident Initiation of a medical surveillance program
Environmental / Community event	<ul style="list-style-type: none"> Potential or actual risk rank of III or IV
Emergency response	<ul style="list-style-type: none"> Employees and contractors evacuation beyond facility Shelter-in-place or mandatory evacuation of the public
Other event	<ul style="list-style-type: none"> If the event or related circumstances involve potential litigation or require legal advice

Corporate notifications for risk rank III or IV events

HSE Director must make Corporate notifications according to Appendix A of the [ConocoPhillips Operations Management System \(OMS\)](#).

Corporate notification process

Corporate notification process in Intelex is completed by:

Verifier of the event	<ul style="list-style-type: none"> Select corporate notification in Intelex.
Opportunity to learn (OTL)	<p>Risk rank III and IV events require notification per the:</p> <ul style="list-style-type: none"> COP Event Management and Learnings Practice COPA Opportunity to Learn Practice

DOT notifications

Notify DOT supervision as soon as possible of any event involving a confirmed gas release or pipeline failure. DOT report needs to be reported within 1 hour.
Fire/Explosion incidents also need to be reported to DOT within the 1-hour time frame.

Risk ranking events

Risk ranking events

Risk rank incidents using the [COP Risk Matrix Standard](#). Enter actual and potential risk rank for all events (potential only for near misses).

Reviewer and verifier	Completed by COPA Supervisor and/or COPA HSE Representative.
Final risk rank verification	Made by COPA HSE Representative with management input.




Requirements for creating events in InteleX

Determine
Operational control

Operational control determines level of investigation and event type in InteleX.

Operational control	Non-operational control or third party
Event must be entered in InteleX as incident/near miss.	Event must be entered in InteleX as Documentation Only.



NOTE: Consult the applicable Supervisor, HSE Representative, or Contract Owner for determination. Use Appendix C of the [COP Contractor HSE Management Standard](#) for guidance.

Events requiring
reporting in InteleX

All events/near misses must be reported in InteleX by COPA Supervisor or designee before end of the Supervisor’s shift. Field Environmental Coordinator (FEC) evaluates all spill reports to determine if InteleX Entry is required.

Determine if event is
a Process Safety
Event or PSE Near-
miss

COPA Supervisor entering the event in InteleX must consult the [Alaska Process Safety Metrics Reporting Procedure](#) to determine if the event is a Process Safety Event (PSE) or a PSE Near-miss. Refer to [Corporate Process Safety Guideline](#) for appropriate Tier category. For questions contact:

- Alpine Safety Specialist
- NS HSE Supervisor
- PSM Technical Authority (TA)



Injury/Illness classification and re-classification

Injury/Illness Classification

COPA representative completing the event must classify the injury/illness in Intelex in accordance with OSHA recordkeeping requirements,

Reclassification of Injury/Illness

Any injury/illness that is reclassified must be:

- Re-evaluated for appropriate investigation by COPA Representative
- Communicated to the COPA HSE Representative

If subevent is closed in Intelex	<ul style="list-style-type: none"> • Request AK HSE Aide re-open the subevent.
Verifier may update event classification and information	<ul style="list-style-type: none"> • Reason for the change in classification • Date the reclassification went into effect • Date restricted/lost days went into effect • Date the restricted/lost days ceased being counted • Date the COPA employee returned to work.
Event approvers	<ul style="list-style-type: none"> • Must re-approve the event after changes are made. • COPA may request further explanation and accompanying documentation.
Communication to COPA Contract Owner	<ul style="list-style-type: none"> • Must be made for contractor reclassifications.



Investigation

Preserve evidence and secure area

Dispatch qualified personnel as soon as possible

Dispatch qualified personnel trained in incident investigation to the scene to collect/preserve evidence.

Secure the Area

Secure the area according to:

- Guidance from Security or
- COPA Emergency Response Plan (ERP)

Investigation requirements

Level of Investigation

Appropriate level of COPA Supervision will determine type of investigation to assign, in alignment with Section 10 of the [Operations Management System](#) and the [Event Management and Learnings Practice](#). Supervision will verify investigation is completed along with closure approvals.

Risk Rank / Event Type	Method
<ul style="list-style-type: none"> • I/II (Actual or Potential) • Tier 2 PSE 	<ol style="list-style-type: none"> 1. Complete simple investigation, at the discretion of Supervision. 2. Enter event data in Intalex. 3. Do not select 'Investigation required' in Intalex unless responsible COPA Supervisor requests an RCA investigation.
<ul style="list-style-type: none"> • III/IV (Actual or Potential) • Tier 1 PSE 	<ol style="list-style-type: none"> 1. Enter event data in Intalex. 2. Select 'Investigation required' in Intalex. 3. Complete RCA (TapRoot or Failsafe LCA). 4. Share learnings per Section 3 of the Event Management and Learnings Practice.

All investigation reports should be considered company confidential. Never distribute outside the company without approval.




NOTE: OSHA PSM requires initiation of an investigation within 48 hours of each incident that resulted in, or could reasonably have resulted in, a catastrophic release of a highly hazardous chemical in the workplace.



Timeline for investigation

Type of investigation determines timeline for completion.


Simple Investigation in Intelex	RCA
72 hours	60 calendar days for completion

 **NOTE:** Extension beyond 60 days requires BU HSE VP approval followed by corporate VP HSE approval.

RCA Investigation tools

RCA investigation tools:

- [Alaska LCA Template](#)
- [TapRoot](#)

 **NOTE:** Learning Teams may support simple or RCA investigations but cannot be used as an alternative.

Topics for investigation

Members of the investigation process should:

Interview	<ul style="list-style-type: none"> • Workers and subject matter experts
Review	<ul style="list-style-type: none"> • Applicable procedures • Physical equipment parts • Training records • Equipment inspection and maintenance records
Analyze	<ul style="list-style-type: none"> • Behavior observation data • Process and equipment data • Operating conditions

Lead investigator

Lead Investigator requirements differ by investigation type.

Type	Lead Investigator
Elective RCA	<ul style="list-style-type: none"> • COPA employee or Contractor
Risk Rank III or IV	<ul style="list-style-type: none"> • COPA employee or Contractor in COPA-direct HSE role • Must have formal training and field experience in the RCA method used
Risk Rank IV	<ul style="list-style-type: none"> • Not directly involved in the organization experiencing the event
Risk Rank III	<ul style="list-style-type: none"> • Not directly involved in the day-to-day operation of the facility or function experiencing the event
Tier 1 PSE	<ul style="list-style-type: none"> • COPA employee or Contractor • Must have formal training and field experience in the RCA method used



Investigation Team Members

Investigation team must not exceed 7 members without approval from HSE Director. Investigation team should consist of the following:

Team Member	Risk Rank IV	Risk Rank III	Risk Rank I or II
COPA First Line Supervisor	Required	Required	Required
COPA/Contractor HSE Specialist		Required	Required
Subject Matter Expert		As needed	As needed
Lead Investigator (LI)		Required	As needed
COPA Legal	As needed		
Contractor Rep.	Required if involved in event		

RCA quality control process

Incorporate a quality control process for RCA investigations:

Step	Action
1.	Lead Investigator submit final draft report to COPA HSE Representative before supervisor approval
2.	COPA HSE Representative must supply comments back to Lead Investigator
3.	Lead Investigator will review comments with team and approver
4.	Lead Investigator will then upload report to Intelex and submit to approver

Action plan tracking

Action plans

Corrective actions from events must be tracked using an action plan in Intelex until corrected.

Objections to action plan

Approver or Management review members may object to recommended action plan and must communicate objections to lead investigator.

Action plan/final report approval/record retention

Submit final action plan for approval to appropriate level of COPA management:

Risk Rank	Approver
IV	President or Applicable BU Leadership Team Member
III	VP Operations or North Slope Operations Manager
II	Operations Manager Direct Report, Technical Authority, Superintendent
I	Supervisor, Senior Operator, Advisor, Workgroup Supervisor, Permit Holder, Risk Assessment Owner

Record copy will be Intelex for all investigations.



Links/Reference Materials

Links

Topic	Link
Intelex Rollout and Guidance	<ul style="list-style-type: none"> Intelex Rollout Presentation Intelex for HSE Data Management
Corporate Event Management	<ul style="list-style-type: none"> Operations Management System (OMS) Event Management and Learnings Practice Occupational Injury and Illness Reporting and Recording Practice Contractor HSE Management Standard Occupational Health Standard Corrective Action Plan Practice
Corporate Risk Matrix Standard	<ul style="list-style-type: none"> Risk Matrix Standard
Process Safety Event Reporting	<ul style="list-style-type: none"> AK Process Safety Metrics Reporting Corporate Process Safety Metrics Guideline.pdf Process Safety Event Reporting Framework
Investigation Templates & Guidance	<ul style="list-style-type: none"> Alaska LCA Template TapRoOT Software How-to Guide Global Learning Team Guideline
SkillsNOW	<ul style="list-style-type: none"> SkillsNOW v10

Contact List

Contact	Contact Number
Kuparuk Security	(907) 670-7300
Kuparuk Medical Clinic	(907) 659-7230
Alpine Security	(907) 670-4900
Alpine Medical Clinic	(907) 670-4100
DOT	(907) 659-7042
AKOSH	(800) 770-4940 or (907) 269-4940
BLM (major undesirable events) Donna Wixon	(907)-474-2301
AK State Troopers	(907) 269-5511
State medical examiner	(907) 269-7800



Acronyms

Acronym	Meaning
AKOSH	Alaska Occupational Safety and Health
BLM	Bureau of Land Management
COPA	ConocoPhillips Alaska
DO	Documentation Only
DOT	Department of Transportation
HSE	Health Safety & Environmental
LCA	Latent Cause Analysis
NOV	Notic of Violation
NSB	North Slope Borough
NSK	North Slope Kuparuk
OTL	Opportunity to Learn
PEN	Preliminary Event Notification
PSE	Process Safety Event
PSF	Process Safety Fundamentals
PSM	Process Safety Management
RCA	Root Cause Analysis



Event Reporting & Investigation Process Flow

