DEPARTMENT OF ENVIRONMENTAL PROTECTION
Office of Oil and Gas Management

DOCUMENT NUMBER: 800-2200-001

TITLE: Guidelines for the Development and Implementation of Oil and Gas Well Site Integrated Contingency Plans for Unconventional Well Sites.

EFFECTIVE DATE: Upon publication as final in the *Pennsylvania Bulletin*.

AUTHORITY: The 2012 Oil and Gas Act (58 Pa.C.S. §§ 3201–3274); The Clean Streams Law (35 P.S. §§ 691.1, *et seq.*); 1920-A of The Administrative Code of 1929 (71 P.S. §§ 510-5, 510-17, and 510-20); Health and Safety Act (35 Pa.C.S. § 7321) and 25 Pa. Code Sections 78a.55, 91.34, 102.5.

POLICY: The Department of Environmental Protection (Department) will follow the guidance presented in this document to implement the requirements for unconventional well operators to plan and provide effective and efficient response to emergencies and accidents for any situation dealing with the public health, safety and the environment that may occur at a well site.

PURPOSE: The purpose of this document is to provide guidance to unconventional operators on expected and recommended information to be included in unconventional well site Emergency Response Plans and Preparedness, Prevention and Contingency Plans. The main goal of the document is to provide Commonwealth unconventional gas operators a common-sense option for meeting multiple emergency/contingency planning requirements under multiple state regulations. This guidance document covers multiple factors as related to regulated substances, accident prevention, mitigation, and response at well sites.

APPLICABILITY: This document provides a one stop requirement to comply with the state regulations dealing with emergency planning and response and pollution prevention and contingency planning requirements for all activities to be carried out by unconventional oil and gas operations that have a potential to pollute.

DISCLAIMER: The policies and procedures outlined in this guidance document are intended to supplement existing requirements. Nothing in the policies or procedures shall affect more stringent statutory or regulatory requirements.

The policies and procedures herein are not an adjudication or a regulation. There is no intent on the part of the Department to give this document that weight or deference. This document establishes the framework within which the Department will exercise its administrative discretion in the future. The Department reserves the discretion to deviate from this policy statement if circumstances warrant.

PAGE LENGTH: 43 Pages

Guidelines for the Development and Implementation of Oil and Gas Well Site Integrated Contingency Plans (i.e., Environmental Emergency Response Plans/Preparedness, Prevention, and Contingency Plans) for Unconventional Well Sites

The Pennsylvania Department of Environmental Protection (DEP) in conjunction with the Pennsylvania Emergency Management Agency (PEMA) has provided this "one-plan" guidance for integrated contingency planning for the Unconventional Oil and Gas Industry. The intent of its development is to provide Commonwealth's unconventional gas operators a common-sense option for meeting multiple emergency/contingency planning requirements under seven different state regulations and guidance documents. Some operators with facilities that store and use oil may elect to integrate their federally required Spill Prevention, Control, and Countermeasure (SPCC) plan and Facility Response Plan (FRP) into the Integrated Contingency Plan (ICP) or may elect to keep it as a separate document, or as an appendix, to the ICP. This guidance document covers multiple factors as related to regulated substances, accident prevention, mitigation, and response at well sites. In order to meet the varying needs of a range of public and private sector stakeholders, the plan template herein contains critical information for first responders, a site-specific plan, and a core emergency response plan as well as regulatory references and forms for emergency response field use. Plans prepared in accordance with this guidance document will satisfy requirements of the seven DEP regulations and guidance documents listed below.

This one-plan approach is intended to minimize duplication of effort and standardize the format of emergency response information and DEP's multiple preparedness, prevention, and contingency plans. It is divided into six sections to streamline field use. The structure also streamlines the review process for the DEP and plan maintenance for the Oil and Gas Industry. Following a brief introduction, there is a section that provides critical information and maps for on-site personnel and first responders, referred to as "Quick Sheets". The next section is divided into two parts containing a site-specific Emergency Response Plan which can easily be updated for each new location or as the type of activity changes on a site, and an emergency response base plan that may contain companywide or regionally based standard policies and procedures. The remaining sections focus on Preparedness, Prevention, and Contingency Planning as required across multiple DEP regulations and is structured with the intent to reduce redundant information already incorporated into other sections of the plan.

A Regulatory Matrix is provided as a reference to the seven different state regulations and guidance documents, as well as the federal SPCC requirements. To generate an integrated contingency plan that includes federal SPCC/FRP regulations, please review the appropriate 40 CFR Part 112 regulations listed in the regulation matrix as the focus of this guidance document is to address Commonwealth of Pennsylvania requirements.

The seven state regulations and guidance documents, as well as the federal SPCC, are listed below and are active links to the appropriate government websites.

- Guidelines for the Development and Implementation of Environmental Emergency Response Plans, 400-2200-001, August 6, 2005 (DEP Guidance)
- 25 Pa. Code § 91.34 – Activities utilizing pollutants
- 25 Pa. Code § 78a.55 – Control and disposal planning; emergency response for unconventional wells
- Pennsylvania's Oil & Gas Act – Subchapter B: General Requirements, 58 Pa.C.S. §§ 3211-3227
- Act 13 Frequently Asked Questions

- Addressing Spills and Releases at Oil & Gas Well Sites or Access Roads, 800-5000-001, September 21, 2013 (DEP Guidance)
- 40 CFR Part 112 – Oil Pollution Prevention (EPA)

Section I – Plan Introduction

Section I – Plan Introduction

1. Executive Summary

Briefly describe the unconventional oil and gas activity (primary, secondary, tertiary, production, or exploratory, etc.) that occurs at the well site. Identify and briefly summarize the type of operations, whether oil, gas, or both. Describe the method of drilling the wells (air rotary, fluid rotary, cable tool, etc.).

2. Plan Contact Information

a. Operator

Provide company name. Identify physical and mailing addresses and phone number for corporate office and/or field offices.

b. Key Contact(s) for Plan Development and Maintenance

Provide the name and/or the position in the operator's organization responsible for providing the plan information. Include phone numbers.

3. Plan Review and Record of Revision

The plan must be reviewed and revised prior to implementing a change to the practices identified and updated with revisions and history after an incident occurs.

The preparedness response organizational structure should have the overall responsibility for periodically reviewing and evaluating the plan and instituting appropriate changes at regular intervals. The organizational structure should also be responsible for the review of new construction and process changes at the facility relative to the plan. The organizational structure should also evaluate the effectiveness of the overall plan and make recommendations to management on related matters.

The operator shall review the emergency response plan found in Sections IIA and IIB of the ICP and submit an update annually on or before March 1 each year. In the event that updates are not made to the plan for that review period, the operator shall submit a statement indicating the review was completed and updates to the plan were not necessary. The emergency response plan found in Sections IIA and IIB of the ICP and subsequent updates should be submitted to: PEMA, the Department, the county emergency management agency, and the Public Safety Answering Point with jurisdiction over the well site. The required information for Emergency Response Plans that must be submitted to the agencies listed above can be found in Title 25 Pa Code § 78a.55(i)(5)(i)(A-I).

This section should document the date of the initial development of the plan, as well as every subsequent update made to the plan. This section should be formatted as a table and contain the change number, the date the change was made, and a summary of the changes made to the plan. Any relevant information may be included as well.

4. Certification of Annual Review

This page should be updated annually by the unconventional well site operator to certify that they have reviewed the plan and also affirm that the Emergency Response plan remains effective to respond to an emergency at the site.

5. Plan Availability

A current copy of the Preparedness, Prevention, and Contingency plan (Section III) must be maintained on-site during construction activities, drilling, and completions. A copy of the Emergency Response plan (Sections IIA and IIB) shall be available at the well site during all phases of operation. Describe where to find the integrated plan.

6. Promulgation Page

The promulgation page is a certification and official declaration that the operator endorses the ERP. The page should be signed by a representative of the company with the authority to make such a declaration.

7. Table of Contents

8. First Responder and On-Site Personnel QUICK SHEETS

The following Quick Sheets section (pages _ to _ herein) is intended to serve as a standardized reference for first responders and on-site personnel to provide initial critical information without accessing the full integrated Plan. **Once the plan is complete and the Promulgation Page is signed, relocate the Quick Sheet section (pgs _ to _) to the beginning of the emergency response plan section of the completed document in order to facilitate their immediate access.**

Section I.8 – Quick Sheets

A. OPERATOR AND WELL SITE INFORMATION
Name of Owner/Operator:
- EMERGENCY RESPONSE PLAN
Well Pad – County, Municipality: Operator: Site Name:
General Permits, WMGR-123, ESCGP, API/Permit #(s):
Revised Date:
B. 24 - HOUR EMERGENCY NUMBER -

Site 911 Address	**, PA**	**Directions to Site:**
Access Road Municipality/County		
Site Access Road Entrance Coordinates Location		
Well Pad Coordinates Location		
Helipad Coordinates Location (approved off-site)		

C. Owner/Operator/Contractor Contacts

Title	Name	Phone

D. Local Emergency Responder Contacts – 911

Responder	Address 1, City, Zip Code	Phone
EMA:	**, , PA**	
PA State Police:	**, , PA**	
Fire Department:	**, , PA**	
EMS:	**, , PA**	
Hospital:	**, , PA**	
Local Police	**, , PA**	
	, , PA	

E. Surface Owner(s) Contact		**F. Site Evacuation Signal**	
Owner		**Type and duration of Evacuation Signal:**	
Home Address	**, , PA**	**On- Site Muster Point:**	**Off- Site Evacutaion Point:**
		Special Instructions:	

G. Location of Safety Data Sheets
Description:

H. Critical Information for First Responders

I. Emergency Response Procedures for Site Personnel (Quick Reference)	
Fire:	
Medical Emergency:	
Explosions:	
Spills:	
Security:	
Notes:	

J. Site Location Map - To include as applicable, but not limited to, the following features

Aerial base map
Road name labels
Topographic Contours

Structures
Well Pad
Building
Residential
School
Hospital
Fire Department
Nursing Home
Day Care
Airport
Livestock

Water Resources (PADEP)
Discharge
Groundwater Withdrawal
Interconnection
Storage
Surface Water Withdrawal
Stream/River
Swamp/Marsh
Lake/Pond

Oil and Gas Well Location
Abandoned
Active
Inactive

Access Roads

Half-Mile Buffer

Tax Parcel boundary and Id

Scale, Legend, and North Arrow

K. Site Detail Map - To include, as applicable but not limited to, the following features

Restricted and open-access areas
Entrance and exit routes
Guard Shack
Alarm Horn
SDS
Flare Stack
Spill Kit
Spill Trailer
Gas Cylinder Storage
ESD (Emergency Shutdown Device)
Wind Sock
Fire Extinguisher
Muster Point
Eyewash
First Aid Kits
AED
Fuel Tank
Methanol Tank
Trailers
Well Heads
Brine Tanks
GPUs (Gas Production Unit)
Storage areas for regulated substances
Or
Construction Site Plan for initial earth moving activities during construction phase.
Scale, Legend, and North Arrow

***Note:**

For both Site Location and Site Detail Maps, industry standard symbology, such as ESRI petroleum style set, is recommended. For emergency response related components, the following guides are recommended:

- Federal Geographic Data Committee Homeland Security Working Group (FGDC HSWG) – ANSI INCITS 415-2006
- National Alliance for Public Safety GIS Incident Symbology Workgroup Symbols (NAPSG)
- National Wildfire Coordinating Group (NWCG) GSTOP

A legend is required for both Site Location and Site Detail Maps.

Guidelines for the Development and Implementation of Oil and Gas Well Site Integrated Contingency Plans for Unconventional Well Sites – Quick Sheet Instructions

The following instructions are designed to assist the applicant in properly completing the *Oil and Gas Well Site Integrated Contingency Plans for Unconventional Well Sites Section I.8 "Quick Sheets*." Please type or print clearly when completing the form. If the information requested involves more than the space allows, copy the form and append additional required information. Pursuant to 35 Pa.C.S. § 7321(a)(3) and 25 Pa. Code § 78a.55(i)(5) (relating to emergency response plans.

Please provide to the best of your knowledge, complete and accurate information.

A. OPERATOR AND WELL SITE INFORMATION

- Enter the well owner/operator name. This should be the corporate name.
- Enter the name of the Emergency Response Plan. This should be the specific Well Pad Name.
- Enter the County and Municipality where the actual well pad is located. Enter the name of the operator is working under. Enter the Site Name.
- Enter all PADEP issued permits associated with the Well Pad. This includes Well Permits, ESCGP, WMGR-123, Air Quality and Chapter 105 General Permits.
- Enter the date the Emergency Response Plan was last updated.

B. 24 HOUR EMERGENCY NUMBER

- Enter the Operator's 24-Hour Emergency Number. This number should have a live person answering it.
- Enter the Site 911 Address for the entrance point of the access road.
- Enter the County and Municipality where the access road entrance is located.
- Enter the coordinates for the access road entrance.
- Enter the coordinates for the actual well pad the emergency response plan serves.
- Enter the coordinates for the location of the off-site helipad.
- Provide directions to site from multiple directions (if applicable) starting with easily identifiable Interstate Highways or State Routes.

C. OWNER/OPERATOR/CONTRACTOR CONTACTS

- Enter the contact information of all people who may need to be notified of an emergency situation.

D. LOCAL EMERGENCY RESPONDER CONTACTS - 911

- Enter the names address and phone numbers of the local emergency responders that serve the area where the site is located.

E. SURFACE OWNER CONTACT

- Enter the property surface owner(s) contact information for which the site is located on. This information should include the owner's name, home address and all available contact numbers, such as Home, Work, and Mobile.

F. SITE EVACUATION SIGNAL

- Enter the type (describe sound) and duration (length of time) of Evacuation Signal. Describe where the On-Site Muster Point is located. Describe where the Off-Site Evacuation is located. Provide any special instructions that are pertinent to the evacuation of the well site.

G. LOCATION OF SAFETY DATA SHEETS

- Describe the onsite location of Safety Data Sheets.

H. CRITICAL INFORMATION FOR FIRST RESPONDERS

- Provide critical information for first responders. Examples may include: Access procedures for gated areas, emergency vehicle staging areas, throughway restrictions, recommended travel lanes, available water sources, or any site-specific restrictions, cautionary notes, and directions for those unfamiliar with the site layout.

I. EMERGENCY RESPONSE PROCEDURES FOR SITE PERSONNEL

- Provide concise initial emergency response procedures to be enacted for people working onsite.

  Example: Medical - provide first aid if trained and capable of doing so for non-life-threatening incidents.

  Request first responders using the following emergency number _____ (or listed in this plan).

  If needed, transport patient to _____hospital located at _____ (or as listed in this plan), or rendezvous with EMS. Conduct internal notifications procedures as required and as set out in section _ of this plan.

J. SITE LOCATION MAP

- Include an aerial base map with geographic contours and road names. The map should also include identification of any occupied structures, livestock areas, natural resources (e.g. bodies of water and waterways), public institutions (e.g. schools, hospitals, day care), access roads, half mile buffer zone, etc.

K. SITE DETAILED MAP

- Include a site-specific drawing of the well pad, access road and any contiguous well pad supporting facilities that is representative of the current phase of operations (e.g. construction, drilling, stimulation, alteration, plugging, etc.). Examples of features that should be included are: guard shack, muster point, spill kits/trailer, entrance and exit routes, wind socks, fire extinguishers, eye washes, first aid kit, fuel tanks, well heads, chemical storage areas, etc.

Submit this form and any additional necessary documents through DEP Green Port located at: www.depgreenport.state.pa.us .

Instructions on specific oil and gas electronic applications can be accessed at: http://www.dep.pa.gov/OG-submit .

Section IIA – Emergency Response Plan
Site-Specific Information

Section IIA – Emergency Response Plan Site-Specific Information

Oil and Gas activities may create the potential for many types of incidents for which response may be necessary such as: fires, well blowouts, chemical and fuel spills, and traffic accidents. If an emergency situation develops at an oil and gas location, local first responders must secure the site and take appropriate action until emergency specialists retained by the operator arrive on site. Preparations for and response to natural gas incidents requires additional emergency management planning at the local, county, and regional levels and appropriate equipment and training, particularly with respect to natural gas well operations.

Unconventional oil and gas well pads and related facilities should be assigned a 9-1-1 address for emergency response purposes. Oil and gas operators should provide GPS coordinates for access roads and well pad sites, and post this information, along with appropriate emergency response contact information, in a conspicuous manner at the well pad site according to applicable signage requirements.

Emergency response planning is a central part of ensuring that the impacts of incidents are minimized. The emergency response plan must utilize the concepts of the National Incident Management System (NIMS) to the maximum extent practicable. The emergency response plan should contain a description of the procedure used to provide current information to emergency responders in the event of an emergency, including current Safety Data Sheets for materials located at the well site. Therefore, the site-specific emergency response plan should accurately reflect the current conditions found at the unconventional well site and the response actions for the following stages of operation at the well site: Preparation of the access road and well site; Drilling of the well; Hydraulic fracturing/Stimulation of the well, Production, Well site restoration, and Plugging of the well. Emergency response plans shall consist of a site-specific plan (Section IIA) for each well site with information relevant to that site along with a statewide plan (Section IIB) common to all of an operator's well sites.

1. Site Identification

    a. Site Name

    b. Physical Address

    c. County, 911 address, latitude/longitude for site entrance and site location, and directions from public road.

2. Site Maps and Drawings

    Include a 7 1/2 minute USGS map, as well as, other maps and drawings as needed to show the following in sufficient detail:

    — Site Name
    — Site location
    — Name of the 7 1/2 minute USGS quadrangle
    — County and township
    — Location of site and site boundaries
    — 1/2 mile radius with vulnerable receptors (e.g. human populations, both workers and the general public, environmentally sensitive areas, and other site-specific concerns)

- General layout of the site
- Areas occupied by oil and gas activities
- Location of storage areas for regulated substances with ranges of quantity stored during Preparation of the access road and well site; Drilling of the well; Hydraulic fracturing/Stimulation of the well; Production; Well site restoration; and Plugging of the well.
- Describe valving and manifolding
- Location of Emergency Shutdown Device(s) (ESD)
- Location of surface drainage courses leading away from the site, and major surface streams and tributaries
- Predicted direction of flow of spilled materials due to equipment failure, accident or human error
- Location of any known public (permitted and docketed) surface water intakes downstream
- Waste handling, storage, processing and treatment facilities
- Drains, pipes, and channels which lead away from potential leak or spill areas
- Outfall pipes which discharge to surface streams or drainage channels
- Restricted and open-access areas
- Entrance and exit routes
- Placement of containment systems

3. Hazards

Provide a summary of the risks and hazards to the public within 1/2 mile of the well site and the associated planning assumptions.

a. Material and Waste Inventory

Identify and list by common chemical name and trade name, the locations, sources and quantities of chemicals and wastes (residual waste and regulated substances, including top hole water, brines, drilling fluids, additives, drilling muds, stimulation fluids, well servicing fluids, oil, production fluids and drill cuttings from the drilling, alteration, production, plugging) managed at the site. Note the on-site SDS binder location. Requests for confidentiality of this information will be handled in accordance with Department regulations. Detailed descriptions must be available for materials that have a high potential for spills, discharges, explosions, or fires (such as those stored in bulk storage). Materials that have a low potential for spills, discharges, explosions, or fires should be minimally detailed. This information should be used to evaluate the prevention, containment, mitigation, cleanup, and disposal measures which would be used in the event of a spill, discharge, explosion, or fire. As new materials are brought onsite their pollution potential should be evaluated. The approximate quantities of each material and the method of storage (sack, barrels, tanks, etc.) should be specified.

b. Material Compatibility

Summarize the engineering practices followed with regard to material compatibility such as materials of construction, corrosion, etc. Engineering practices with regard to material compatibility normally consist of an assessment of the compatibility of construction

materials of tanks, pipelines, secondary containment, etc., with their contents; the reaction of materials or wastes when intentionally or inadvertently mixed or combined; and, the compatibility of a container such as a storage tank or pipeline with its environment. Specific consideration should be given to the procedures and practices delineating the mixing of materials and prohibiting mixing of incompatible materials which may result in fire, explosion, or unusual corrosion. Thorough cleaning of storage vessels and equipment before reuse should be standard practice to prevent the mixing of incompatible materials. Coatings or cathodic protection should be considered for protecting buried pipelines or storage tanks from corrosion.

c. Potential Spill Sources

Describe the sources and areas where potential spills and leaks of wastes and regulated substances may occur such as, but not limited to the following: residual waste and regulated substances, including: top hole water, brines, drilling fluids, additives, drilling muds, stimulation fluids, well servicing fluids, oil, production fluids, and drill cuttings from the drilling, alteration, production, plugging, or other activity.

d. First Responder HAZMAT Briefing Procedures

Because of the dangers and hazards associated with various materials when responding to an emergency, the operator must have clear procedures developed detailing how it will notify and inform first responders of these materials. This section should describe the procedures the well site operator will follow to ensure first responders are informed of these materials and quantities when responding to an emergency. The names of individuals and their Titles/Positions that are responsible for providing this information to responders during an emergency must be identified.

4. Method of Transportation of Natural Gas

This section of the plan should address how natural gas extracted from the well is transported from the well site to the pipeline. If vehicular transportation is used, the area of loading must be clearly identified. If gathering lines are used to connect the well site to the pipeline, these lines must be identified within a 1/2 mile from the well site. Any compressor stations monitoring/metering stations, pigging stations or other potentially hazardous areas should be clearly identified as well if they are within a 1/2 mile of the well site. This section should include a map or drawing of the well site, with the loading area and or gathering lines clearly marked and identified.

5. Emergency Equipment and Deployment Procedures

Equipment suppliers should be contacted to determine the availability and means of delivery of equipment needed for control and remediation of pollution or response to hazards to public health and safety. Describe arrangements with these contractors and the time frame in which they can respond with required equipment. Also include, outside cleanup contractors, backup wastewater hauling firms and companies contracted to assist with spill responses, containment, and remediation.

a. On-Site Emergency Equipment

The ERP should identify all major emergency response equipment located at the well site, where it can be found, and describe how it will be utilized in response to an emergency. Small scale items such as handheld fire extinguishers do not have to be identified in the plan. A chart including Type of Equipment, Quantity, Location, Responsible Party, and Primary Contact is recommended.

b. Off-Site Emergency Equipment and Deployment Procedures

This section of the plan should also outline the emergency equipment either owned by or contracted by the operator which is available off-site to respond to an emergency. This equipment should be listed, along with its location, and the operator's procedures for deploying it in a prompt manner. For off-site equipment, the operator should provide an estimated timeframe for arrival of off-site equipment, as well as a time estimate of the equipment becoming operational once it arrives. A chart including Type of Equipment, Quantity, Location, Responsible Department, Primary Contact, Time to Arrival, and Time to Operational is recommended.

c. Maintenance and Decontamination of Equipment

Describe the procedures for maintenance and decontamination of emergency equipment. All active sites should have equipment available to allow personnel to respond safely and quickly to emergency situations. Some examples of emergency equipment are portable fire extinguishers, fire control equipment (including special extinguishing equipment such as that using foam, inert gas, or dry chemicals), spill control equipment, decontamination equipment, self-contained breathing apparatus, gas masks, and emergency tool and patching kits. All equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. After an emergency, equipment should be decontaminated (if necessary), cleaned, and made fit for its intended use before normal operations resume.

6. Internal and External Notifications

This section should outline the emergency notification procedures the operator will utilize during an emergency and show the operator's ability to provide prompt notification for personnel, municipal, county, and State Agency stakeholders, and include back-up methods for alert and notification. It is critically important for this section of the plan to be reviewed and updated during the operators' annual plan review.

a. Alarm Systems

Describe the internal communications or alarm used to provide immediate emergency instruction (voice or signal) to personnel. Describe the external communications or alarm system used to summon emergency assistance from local police or fire departments. Examples of communications or alarm systems are: handheld two-way radios; CB radios; telephones; fire or police alarms; PA systems; beeper or voice pagers, etc.

b. Local Emergency Response Agencies and Hospitals

Provide a list of local emergency response agencies and hospitals. Include the phone numbers and describe arrangements concerning the emergency services they will provide. Arrangements should be made, as appropriate, to inform local emergency response agencies, and hospitals concerning the type of materials or wastes handled at the installation and the potential need for services. Arrangements should be made which will designate who will be the primary emergency response agency and who will provide support services during emergencies. Efforts should be made to familiarize police, fire departments, emergency response teams, and the County Emergency Management Coordinator with the layout of the site, the properties and dangers associated with the hazardous materials handled, places where personnel would normally be working, entrances to roads inside the site, and the possible evacuation routes.

c. Agency Notification Lists

Provide a list of agencies and phone numbers that must be contacted in the event of an emergency or spill. List must be prominently displayed at the well site during drilling, completion or alteration activities. Emergency contact information must be consistent with signage. A list must be developed for notifying state, local, and federal regulatory agencies of reportable spills. Such a list should include, as applicable: PA DEP; County Health Department; County EMA: PA Fish and Boat Commission; the National Response Center (U.S. EPA and U.S. Coast Guard); and local police and fire departments.

d. Emergency Response Contractors List

Provide a list of emergency response contractors, phone numbers, addresses and the services they will provide. The scope of services provided by contractors should be researched and arrangements made for the prompt performance of contractual services on short notice. Provide the name, address and contact information of the companies contracted by the operator that may assist with spill responses, containment, and remediation.

e. Downstream Notification

If an accident, incident, or other activity endangers downstream water users or results in pollution or a danger of pollution to waters of the Commonwealth, the operator, when reasonably possible to do so, is responsible to notify known downstream users of the surface waters. List of downstream users may be developed from information provided by the county Emergency Management Agency. Other laws and regulations may also contain notification requirements depending on the nature of the incident or activity.

7. Evacuation Plan

Describe the evacuation plan for personnel. The plan must describe signals to be used to begin evacuation, primary evacuation routes and alternate evacuation routes (in cases where primary

routes could be blocked by releases of hazardous materials, wastes, gases, or fires). Periodic drills should be conducted to evaluate the effectiveness of the plan.

8. Public Alert Notifications and Procedure

a. Summary of Procedure

b. Alert Notice

Example Content:

This is _____ with (Company). I am contacting you because we are experiencing some problems at the nearby _____ (well site, pipeline, facility). The situation does not pose any immediate treat, but we want you to be aware of it.

We have dispatched personnel to investigate the situation. If for any reason we believe you to be at risk, we will ask you to evacuate. You will be directed to an evacuation route and requested to report to the _____ OR requested to provide us with a telephone number for further notification and updates.

Please stay indoors if possible, with the doors and windows closed. (Hydrogen Sulfide (H2S) related incident)

How many people are currently at your location? Would you require transportation?

We do not anticipate this to last for a long period of time. I will contact you by _____ with an update.

If you require further information, please call me at _____. Thank you for your cooperation.

c. Evacuation Notice

Example Content:

This is _____ with (Company). I am contacting you because we are experiencing a problem at the nearby _____ (well site, pipeline, facility).

You are in no immediate danger now and control operations are underway. However, as a safety precaution, we request that you leave your home and proceed promptly to the _____ via (Describe appropriate route).

Please consider the following things, should an evacuation be necessary:

How many people are currently at your location?

Do you have adequate transportation? (In Hydrogen Sulfide (H2S) related incident request that the residents stay indoors and close all windows and doors and dispatch personnel to the site to assist)

Do you need assistance in evacuating?

We will be sending a representative to the _____ to address your questions or concerns related to the evacuation OR we can speak with you telephonically, per your request.

If you require further information, please call me at _____. Thank you for your cooperation.

9. Media Relations Procedures and Statement

a. Summary of Procedures

b. Statements

Section IIB – Emergency Response Plan Base

Section IIB – Emergency Response Plan - Base

1. Purpose and Scope

This section of the plan should outline the purpose of the ERP. In general, the plan should outline the procedures and actions the operator, his agents, and responders will utilize to respond to an emergency at an unconventional well site. The scope of the plan should outline the general geographic area in which the plan has authority, as well as specifying the entities (private and governmental) the plan will draw upon to respond to an incident at the well site.

Example Content:

- To safeguard lives, prevent property damage, and protect the environment.
- To provide for effective oil and gas well(s) and site surveillance, prompt notification to first responders and local emergency management agencies, citizen warning and evacuation response, and information exchange when required.
- To identify emergency actions to be taken by the Well owner/operator, coordination with public officials and emergency personnel when necessary, and to outline response actions in the event of a potential or imminent threat, malfunction, or failure at the well site.

2. Discovery and Preliminary Assessment

This section should address the initial action the person(s) discovering an incident will take to assess the problem and activate the response system. Include an identification of incident type, hazards involved, magnitude of the problem, and resources threatened. The use of checklists or flowcharts is highly recommended. Cover fires, medical emergencies, explosions, loss of well control, spills, and security breaches.

The emergency response plan must address response actions for the following stages: preparation of the access road and well site, drilling of the well, hydraulic fracturing and stimulation of the well, production, well site restoration, and plugging of the well.

3. Initial Response

This Section should provide for activation of the response system following discovery of the incident. It should include an established 24-hour point of contact (i.e., that person and alternate who is called to set the response in motion) and instructions for that person on who to call and what critical information to provide. Mitigating actions should be tailored to the type of hazard present, such as fires, medical emergencies, explosions, loss of well control, spills, and security breaches. Relevant considerations to ask in developing such materials include: type of emergency, areas/resources affected, exclusion zone, source control, and response resources.

4. Concept of Operations

The Concept of Operations outlines and explains the response to an incident that may occur at an unconventional well site. It should clearly explain how the operator and the response community will respond to an incident.

Example Content:

- The local fire department will mobilize the resources and personnel required to provide first response to an incident at a well site.
- The resources of any particular department or agency remain under the administrative, policy procedures, and control of their home agency, but will be under the operational control of the Incident Commander (IC) or unified command.
- The local Emergency Operations Center (EOC) will assist with well site response coordination at the County level as requested by the IC or as the incident dictates. These situations may include hazardous material releases, fires, explosions, or criminal activities.
- Resources may be obtained from County departments and agencies, other supporting Emergency Support Functions (ESFs), municipalities, state agencies, and private entities.

5. Organization

This section outlines how the response to an incident will be organized. This includes what agencies and entities will respond to the incident, how these agencies will be organizationally structured and shall also include an organizational chart outlining the response structure. It is in this section that the operator should incorporate the components of the NIMS and its use of the Incident Command System.

6. Direction, Control, Coordination, and Support

This portion of the plan outlines and describes the structure for direction, control, and coordination of the response to an incident at a well site. Utilizing the NIMS guiding principles, incident management priorities include saving lives, stabilizing the incident, and protecting property and the environment. To achieve these priorities, incident personnel apply, and implement NIMS components in accordance with the principles of flexibility, standardization, and unity of effort. It should clearly explain who has tactical and operational control of response assets and organizations and should describe how conflicts between agencies will be avoided or mitigated.

7. Governmental Assistance and Notification

In this section of the plan, the operator should clearly identify areas in which it requires support from government agencies in order to successfully respond to an incident at a well site, as well as outline and specify the components of Medical, Fire, Hazardous Materials Responses, Security, and any other areas in which the operator requires assistance from local (and state and federal, if

necessary) government agencies. This section shall also outline the process by which the operator would notify and request such assistance.

8. Communication Protocol and Systems

The operator should describe the communications protocols, procedures, and systems it will utilize during the response to an incident. It should also describe the operator's ability and procedures planned to integrate governmental communications into its communications to respond to an incident.

9. Due Diligence Responsibilities

The purpose of this section is to outline operators' procedures in performing due diligence work at the unconventional well site that, if not conducted, could cause an emergency at the well site. At a minimum, this section should specifically discuss spill or leak prevention, preventative maintenance, and discharge and drainage control at the site. The operator should also identify and discuss any other areas of periodic work that should be conducted on-site to prevent an emergency incident.

a. Spill or Leak Prevention and Response
b. Preventative Maintenance
c. Discharge and Drainage Control
d. Other

10. Emergency Response

This section of the ERP should outline the actions to be taken and the procedures to follow in responding to an emergency action at an unconventional well site. In addition, it should also identify the primary (and any secondary) entities responsible for conducting these actions/procedures. The operator should also include any other areas not already identified that are required by the unique characteristics of the well site. These include site-specific hazards that may be unique to that site. (Examples include increased potential of wildfires due to nearby forests, locations near major human population areas or critical infrastructure, etc.).

a. Medical Emergency
b. Fire/Explosion
c. Release of Natural Gas
d. Material Spill
e. Security Breach
f. Other incidents that necessitate the presence of emergency responders

11. Countermeasures for Pollution Prevention and Control

Provide specific countermeasures which will be undertaken in the event of fire, medical emergency, explosion, loss of well control, spill, and security breach. Persons engaged in an activity which includes the impoundment, production, processing, transportation, storage, use, application, or disposal of pollutants shall take necessary measures to prevent the substances from directly or indirectly reaching waters of this Commonwealth, through accident,

carelessness, maliciousness, hazards of weather, or from another cause. Countermeasures should stop the spill or release, prevent migration, and prevent the released substance from reaching or impacting surface water or groundwater.

a. Countermeasures to be Undertaken by Site Personnel:

Provide specific countermeasures that will be undertaken by site personnel in the event of fire, medical emergency, explosion or similar event, spill, and security breach.

b. Countermeasures to be Undertaken by Contractors:

Provide specific countermeasures that will be undertaken by contractors in the event of fire, medical emergency, explosion or similar event, spill, and security breach.

12. Sustained Actions and Termination for Pollution Prevention and Control

This section should address the transition of a response from the initial emergency stage to the sustained action stage where more prolonged mitigation and recovery actions progress under a response management structure. This includes protection of water supplies and remediation. It should also address the development of a mechanism to ensure that the person in charge of mitigating the incident can terminate the response.

Section III – Prevention Planning

Section III – Preparedness, Prevention, and Contingency Planning

1. Hazard Assessment

Provide a detailed assessment of potential hazards present at the well site, an analysis of vulnerable receptors (e.g., human populations, both workers and the general public, environmentally sensitive areas, and other site-specific concerns) within 1/2 mile of the well site, along with a discussion of which risks deserve primary consideration during an incident. Incidents may occur via accident, carelessness, maliciousness, or weather and affect impoundment, production, processing, transportation, storage, use, and application or disposal of pollutants.

Take necessary measures to prevent the potential for substances from directly or indirectly reaching waters of this Commonwealth.

2. Secondary Containment Systems and Practices

All regulated substances, including solid wastes and other regulated substances in equipment or vehicles, shall be managed within secondary containment. Describe the secondary containment systems and practices to be utilized and the area of the well site where secondary containment systems will be employed. Secondary containment systems must be sufficiently impervious and chemically compatible to contain spilled material or waste until it can be removed or treated. Unconventional well sites shall be designed and constructed to prevent spills of regulated substances to the ground surface or spills off the well site, including drilling mud, hydraulic oil, diesel fuel, drilling mud additives, hydraulic fracturing additives, and hydraulic fracturing flowback. Areas where any additives, chemicals, oils, or fuels are to be stored should have sufficient containment capacity to hold the volume of the largest container stored in the area plus 10% to allow for precipitation, unless the container is equipped with individual secondary containment.

Pollution incident prevention practices to eliminate contaminated runoff, leaching, or wind-blowing should be implemented in non-liquid storage areas. Provisions should be made to contain or manage contaminated run-off or leachate from these areas. Truck and rail car loading and unloading areas should have sufficient containment capacity to hold the volume of the largest tank truck or rail car loaded or unloaded at the installation, plus a reasonable allowance for precipitation. Any overhead piping must have adequate clearance over roadways.

3. Pressure Barrier Policy

Include a pressure barrier policy that identifies barriers to be used during identified operations.

4. Inspection and Monitoring Program

Describe the type and frequency of inspections and monitoring for leaks or other conditions that could lead to spills or emergency situations. Areas on the well site that should be inspected include the following: secondary containment, primary storage, loading and unloading areas, transfer pipelines and waste processing facilities. The use of an inspection checklist may be useful in an inspection and monitoring program. Typical inspections include the following:

pipes, pumps, valves, and fittings for leaks; tanks for corrosion; tanks supports and foundations for deterioration; chemical material piles for wind-blowing; evidence of spilled materials along drainage ditches; effectiveness of housekeeping practices; damage to containers; leaks, seeps, or overflows at waste treatment, storage, or disposal sites; etc. Routine monitoring should be performed to determine the physical conditions and liquid levels in tanks, the quality of site runoff in diked areas, etc., either by manual testing or in-situ instrumentation. Monitoring should be used to initiate a warning of the need for immediate corrective action to prevent a spill or other emergency condition. Monitoring systems should be used in conjunction with a communications or alarm system to immediately notify personnel of abnormal conditions. An inventory system should also be considered for keeping track of those materials having the greatest potential for causing problems due to leaks, spills, or mishandling. As a minimum, the frequency of inspection and monitoring must be in accordance with the applicable Department regulations and permits.

5. Preventative Maintenance

Describe the aspects of the preventative maintenance program for equipment and systems relating to conditions that could cause environmental degradation or endangerment of public health and safety. Describe the procedures for the correction of those conditions by adjustment, repair, or replacement before the equipment or system fails. A good preventive maintenance program includes the following: (1) identification of equipment and systems to which the program should apply (e.g. pressure barrier); (2) periodic inspections of identified equipment and systems; (3) periodic testing of equipment and systems (such as routine calibration of environmental monitoring equipment); (4) appropriate adjustment, repair, or replacement of parts (such as collection lines); and (5) recordkeeping of the preventive maintenance activities, inspection and test results, calibration dates, repairs, replacement, and adjustments to the applicable equipment and systems.

6. Housekeeping Program

Identify the areas and the type of housekeeping practices that should apply to reduce the possibility of accidental spills and safety hazards to personnel. Examples of good housekeeping include the following: neat and orderly storage of chemicals; prompt removal of small spillage; regular refuse pickup and disposal; maintenance of walkways and stairs; and, provisions for the storage of containers or drums to keep them from protruding into open walkways, pathways, or roads. Dry chemicals should be swept or cleaned up to prevent possible runoff and wind-blowing.

7. Security

Describe the security procedures employed at the well site to prevent accidental or intentional entry by people or animals. Security systems described in the plan should address, as necessary: fencing; lighting; vehicular traffic control; access control; visitors, registration; locked entrances; vandalism; locks on valves and television monitoring. Security procedures should be in accordance with applicable Department regulations.

8. External Factor Planning

Evaluate the impact on operations, public health and safety, and the environment from the unauthorized acts of third parties, strikes, floods, power failures, snowstorms, and similar problems. Locking valves, special wrenches, fences, and other security measures are examples of measures which could be taken.

9. Waste Control and Disposal Methods

The well operator should have a wastewater source reduction strategy that identifies the methods and procedures the operator will use to maximize the recycling and reuse of flow back or production fluid either to fracture other natural gas wells. The Department will encourage the use of pollution prevention measures that minimize or eliminate the generation of the pollutant over measures which involve pollutant handling or treatment. The Department will encourage consideration of the following pollution prevention measures, in descending order of preference, for environmental management of wastes: reuse, recycling, treatment, and disposal.

This section should address procedures for the control and disposal of fluids, residual waste and regulated substances, including top-hole water, brines, drilling fluids, additives, drilling muds, stimulation fluids, well servicing fluids, oil, production fluids and drill cuttings from the drilling, alteration, production, plugging or other activity associated with oil and gas wells. All wastes generated should be characterized to determine proper disposal methods. Permitted facilities to be used or the need for separate approvals should be incorporated or referenced. The name and address of the disposal facility should be identified along with the transporter and types of wastes that will be disposed of at the facility.

Section IV – Training, Exercise, and Plan Development

Section IV – Training, Exercise, and Plan Development

This section should outline the training and exercise the operator will conduct to ensure that if an emergency were to occur at an unconventional well site, the responding agencies are familiar with the plan and properly trained and can effectively respond to the emergency.

1. Employee Training and Exercise Program

   Summarize training programs given to employees and contractors which will enable them to understand the processes and materials with which they are working, the safety and health hazards, the practices for preventing, and the procedures for responding properly and rapidly to spills. The training program should be designed to ensure that personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures and emergency equipment systems including, where applicable: procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment; key parameters for automatic cut-off systems; communications and alarm systems; response to fires and explosions; site evacuation procedures; and shut down of operations. In addition, the employee training program should address other aspects of the preparedness-response program such as preventive maintenance, inspection and monitoring, housekeeping practices, etc. The training program must be designed and conducted in accordance with applicable Department regulations. Records of the employees' attendance in the training program should be included in personnel files and/or site logs or files.

2. Coordination

   The well owner should communicate with the County EMA(s) of their exercise schedule, and coordinate with the County EMA(s) to exercise all or portions of this ICP as part of the county's all-hazard exercise program schedule.

   a. Exercise Requirements
   b. Training Requirements
   c. After Action Reports

3. Incident History

   List previous reportable pollution or reportable safety related incidents, the date, the material or waste spilled, approximate amount spilled environmental damage, and action taken to prevent a recurrence. An important criterion in determining the effectiveness of the plan and its implementation is the history of incidents. A history of no incidents suggests that practices and procedures at the well site are effective. For a site or company with a history of incidents, it is important to investigate the reasons for the spills and the response of the company in minimizing the potential for their recurrence. This section should provide the option for a site log, a company master file, and/or an electronic file for the most recent version.

4. Plan Development, Maintenance, and Distribution

a. Development

This section discusses and explains the approach used by the operator in developing the ERP and outlines the review and update process the operator will use to meet its annual review requirements. It should also outline the methods of distribution for the initial version of the plan and all subsequent revisions of the plan. The Operator should review the ERP and submit an update annually on or before March 1 each year. In the event that updates are not made to the plan for that review period, the operator should submit a statement indicating the review was completed and updates to the plan were not necessary. Oil and Gas Reporting Electronic (OGRE) has a button to renew an existing plan with no changes that fulfills the need to submit a statement that no changes were made to the existing ERP. By renewing the Emergency Response Plans online, an operator is certifying that the plan was reviewed, and no changes are necessary. The renewal cycle begins January 1st through March 1st. Any plan submitted to DEP in the prior year, regardless of when it was submitted, will need to be renewed during that time period. An ERP also needs to be updated via Greenport if the current ERP does not reflect actual conditions at the well site due a change in phases of operation. ERPs should address response actions for the following stages of operation at the well site: 1) Preparation of the access road and well site, 2) Drilling of the well, 3) Hydraulic fracturing and stimulation of the well 4) Production, 5) Well site restoration, and 6) Plugging of the well.

b. Distribution

DEP requires all operators of unconventional wells in Pennsylvania to electronically submit ERPs through the OGRE system via the DEP Greenport web portal. Operators must upload PDF copies of unconventional well site ERPs in ORGE. Operators have two options for submitting these plans:

Option 1: Operators may submit a separate comprehensive site-specific ERP for each well site that contains all of the required elements.

Option 2: Operators may submit a single ERP common to all of the operator's well sites statewide that contains some of the required Section elements. In addition, operators must submit site-specific ERPs for each well site that contain the remaining required elements.

To further streamline the overall ERP submittal process and to comply with Act 9 requirements, a submission through DEP's OGRE will now also be considered a submission to PEMA, the county EMA, and the PSAP.

Section V – Appendices

Section V – Appendices

1. Glossary/Reference Section (operator specified)

2. Checklists (operator specified)

3. ICS Definitions and Forms (provided)

    a. ICS Glossary
    b. ICS Forms

4. Authority, References, and Regulation Matrix (provided)

Section V.3a - b

What is the Incident Command System? (https://www.osha.gov/SLTC/etools/ics/what_is_ics.html)

The Incident Command System (ICS) is a standardized on-scene incident management concept designed specifically to allow responders to adopt an integrated organizational structure equal to the complexity and demands of any single incident or multiple incidents without being hindered by jurisdictional boundaries.

In the early 1970s, ICS was developed to manage rapidly moving wildfires and to address the following problems:

- Too many people reporting to one supervisor;
- Different emergency response organizational structures;
- Lack of reliable incident information;
- Inadequate and incompatible communications;
- Lack of structure for coordinated planning among agencies;
- Unclear lines of authority;
- Terminology differences among agencies; and
- Unclear or unspecified incident objectives.

In 1980, federal officials transitioned ICS into a national program called the National Interagency Incident Management System (NIIMS), which became the basis of a response management system for all federal agencies with wildfire management responsibilities. Since then, the federal government developed the National Incident Management System (NIMS) which is a comprehensive, national approach to incident management that is applicable at all jurisdictional levels and across functional disciplines. A basic premise of NIMS is that all incidents begin and end locally. NIMS does not take command away from State and local authorities. NIMS simply provides the framework to enhance the ability of responders, including the private sector and NGOs, to work together more effectively. The NIMS incorporates the use of the ICS and mandates its use.

An ICS enables integrated communication and planning by establishing a manageable span of control. An ICS divides an emergency response into five manageable functions essential for emergency response operations: Command, Operations, Planning, Logistics, and Finance and Administration. Figure 1 shows a typical ICS structure.

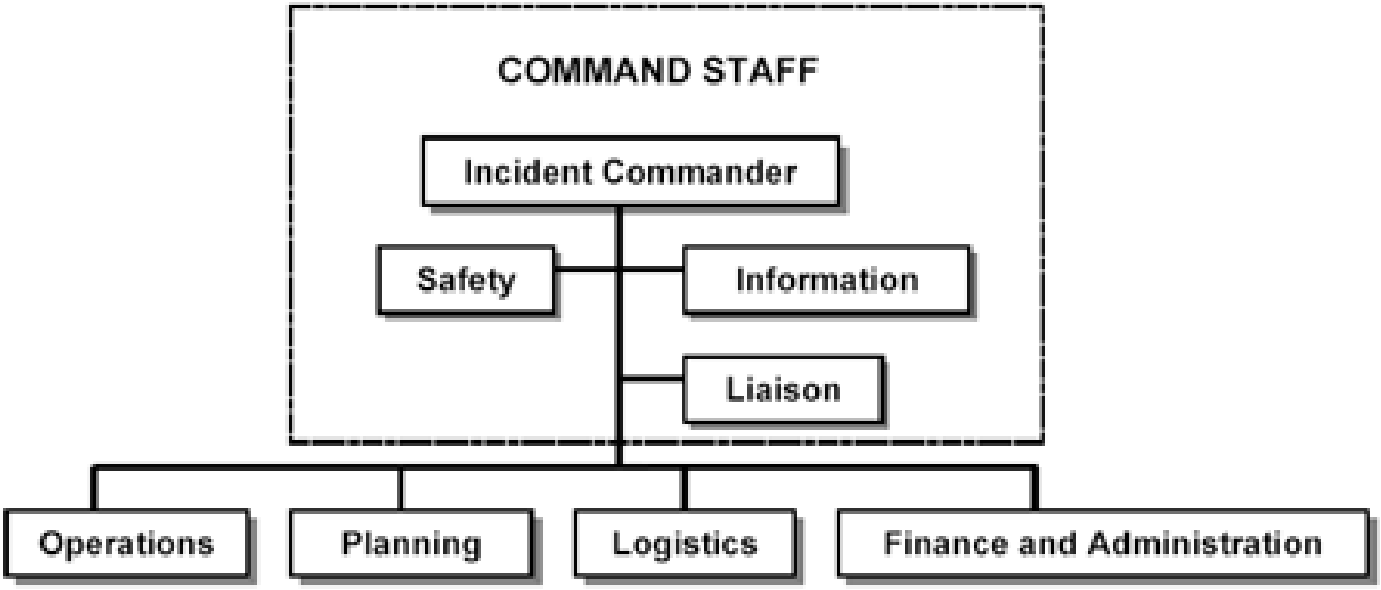

Figure 1 - Incident Command System Structure

The following is a list of the duties generally associated with each ICS function:

The **Incident Commander** (IC) or the **Unified Command** (UC) is responsible for all aspects of the response, including developing incident objectives and managing all incident operations.

The IC is faced with many responsibilities when he/she arrives on scene. Unless specifically assigned to another member of the Command or General Staffs, these responsibilities remain with the IC. Some of the more complex responsibilities include:

- Establish immediate priorities especially the safety of responders, other emergency workers, bystanders, and people involved in the incident.
- Stabilize the incident by ensuring life safety and managing resources efficiently and cost effectively.
- Determine incident objectives and strategy to achieve the objectives.
- Establish and monitor incident organization.
- Approve the implementation of the written or oral Incident Action Plan.
- Ensure adequate health and safety measures are in place.

The Command Staff is responsible for public affairs, health and safety, and liaison activities within the incident command structure. The IC/UC remains responsible for these activities or may assign individuals to carry out these responsibilities and report directly to the IC/UC.

- The **Information Officer's** role is to develop and release information about the incident to the news media, incident personnel, and other appropriate agencies and organizations.
- The **Liaison Officer's** role is to serve as the point of contact for assisting and coordinating activities between the IC/UC and various agencies and groups. This may include Congressional personnel, local government officials, and criminal investigating organizations and investigators arriving on the scene.

The **Safety Officer's** role is to develop and recommend measures to the IC/UC for assuring personnel health and safety and to assess and/or anticipate hazardous and unsafe situations. The Safety Officer also develops the Site Safety Plan, reviews the Incident Action Plan for safety implications, and provides timely, complete, specific, and accurate assessment of hazards and required controls.

The **General Staff** includes Operations, Planning, Logistics, and Finance/Administrative responsibilities. These responsibilities remain with the IC until they are assigned to another individual. When the Operations, Planning, Logistics or Finance/Administrative responsibilities are established as separate functions under the IC, they are managed by a section chief and can be supported by other functional units.

- The **Operations** Staff is responsible for all operations directly applicable to the primary mission of the response.

- The **Planning** Staff is responsible for collecting, evaluating, and disseminating the tactical information related to the incident, and for preparing and documenting Incident Action Plans (IAP's).

- The **Logistics** Staff is responsible for providing facilities, services, and materials for the incident response.

- The **Finance and Administrative** Staff is responsible for all financial, administrative, and cost analysis aspects of the incident.

The following is a list of Command Staff and General Staff responsibilities that either the IC or UC of any response should perform or assign to appropriate members of the Command or General Staffs:

- Provide response direction;
- Coordinate effective communication;
- Coordinate resources;
- Establish incident priorities;
- Develop mutually agreed-upon incident objectives and approve response strategies;
- Assign objectives to the response structure;
- Review and approve IAP's;
- Ensure integration of response organizations into the ICS/UC;
- Establish protocols;
- Ensure worker and public health and safety; and
- Inform the media.

The modular organization of the ICS allows responders to scale their efforts and apply the parts of the ICS structure that best meet the demands of the incident. In other words, there are no hard and fast rules for when or how to expand the ICS organization. Many incidents will never require the activation of Planning, Logistics, or Finance/Administration Sections, while others will require some or all of them to be established. A major advantage of the ICS organization is the ability to fill only those parts of the organization that are required. For some incidents, and in some applications, only a few of the organization's functional elements may be required. However, if there is a need to expand the organization, additional positions exist within the ICS framework to meet virtually any need.

For example, in responses involving responders from a single jurisdiction, the ICS establishes an organization for comprehensive response management. However, when an incident involves more than one agency or jurisdiction, responders can expand the ICS framework to address a multi-jurisdictional incident.

The roles of the ICS participants will also vary depending on the incident and may even vary during the same incident. Staffing considerations are based on the needs of the incident. The number of personnel and the organization structure are dependent on the size and complexity of the incident. There is no absolute standard to follow. However, large-scale incidents will usually require that each component, or section, is set up separately with different staff members managing each section. A basic operating guideline is that the Incident Commander is responsible for all activities until command authority is transferred to another person.

Another key aspect of an ICS that warrants mention is the development of an IAP. A planning cycle is typically established by the Incident Commander and Planning Section Chief, and an IAP is then developed by the Planning Section for the next operational period (usually 12- or 24-hours in length) and submitted to the Incident Commander for approval. Creation of a planning cycle and development of an IAP for a particular operational period help focus available resources on the highest priorities/incident objectives. The planning cycle, if properly practiced, brings together everyone's input and identifies critical shortfalls that need to be addressed to carry out the Incident Commander's objectives for that period.

Standard Form Title	Description
Incident Action Plan Cover Page ICS 200	Indicates the incident name, plan operational period, date prepared, approvals, and attachments (resources, organization, Communications Plan, Medical Plan, and other appropriate information).
Incident Briefing ICS 201	Provides the Incident Command/Unified Command and General Staffs with basic information regarding the incident situation and the resources allocated to the incident. This form also serves as a permanent record of the initial response to the incident.
Incident Objectives ICS 202	Describes the basic strategy and objectives for use during each operational period.
Organization Assignment List ICS 203	Provides information on the response organization and personnel staffing.
Field Assignment ICS 204	Used to inform personnel of assignments. After Incident Command/Unified Command approves the objectives, staff members receive the assignment information contained in this form.
Incident Communications Plan ICS 205	Provides, in one location, information on the assignments for all communications equipment for each operational period. The plan is a summary of information. Information from the Incident Communications Plan on frequency assignments can be placed on the appropriate Assignment form (ICS
Medical Plan ICS	Provides information on incident medical aid stations, transportation services, hospitals, and medical emergency procedures.
Incident Status Summary ICS 209	Summarizes incident information for staff members and external parties, and provides information to the Public Information Officer for preparation of media releases.
Check-In/Out List ICS 211	Used to check in personnel and equipment arriving at or departing from the incident. Check-in/out consists of reporting specific information that is recorded on the form.
General Message ICS 213	Used by: ▪ Incident dispatchers to record incoming messages that cannot be orally transmitted to the intended recipients. ▪ EOC and other incident personnel to transmit messages via radio or telephone to the addressee. ▪ Incident personnel to send any message or notification that requires hard-copy delivery to other incident personnel.

SECTION VI– REGULATION MATRIX

	EERP	25 Pa. Code § 78a.55	25 Pa. Code § 91.33 § 91.34	Act 13 §§ 3215-3222	SPCC 40 CFR 112
I. Plan Introduction					
1. Plan Description	II.A.1				
2. Plan Contact Information					
a. Operator					20(h)(2)
b. Key Contacts		(i)(5)(i)(D)(III)			
3. Plan Review & Modification Process	II.A.5	(e) (i)(5)(iv-vii)		3218.2(b) FAQ 9 (CUW) FAQ 10 (CUW)	5
4. Plan Availability	I.C.7 I.D	(d) (i)(5)(vi)			3(e)
5. Table of Contents					
IIA. Emergency Response Plan					
1. Discovery & Preliminary Assessment		(i)(5)(i)(C)			20(h)(6)
2. Initial Response		(a-d) (i)(5)(i)(C)	34(a) 34(b)		20(h)(1)(iii) 20(h)(3)(iv) 20(h)(3)(ix) 20(h)(2) 20(h)(5)
a. Organizational Structure	II.B.1	(i)(5)(B)			
b. Emergency Coordinators	II.B.2 II.B.3 II.B.4	(i)(5)(i)(A)			20(h)(1)(i,v) 20(h)(3)(i,v) 20(h)(3)(ix)
c. Internal & External Notifications	II.D.3 II.E.1 II.E.2 II.E.3	(h) (i)(4) (i)(5)(i)(B)	33(a)	FAQ 9 (CUW)	7(a)(3)(vi) 20(h)(1)(ii) 20(h)(3)(iii,iv)
d. Countermeasures		(i)(5)(i)(C)	34(a) 34(b)		7(a)(3)(iv) 7(a)(4) 20(h)(1)(iv,vii) 20(h)(3)(i,ii) 20(h)(7)
1) Actions by Site Personnel	II.D.1				
2) Actions by Contractors	II.D.2			FAQ 9 (CUW)	
3) Evacuation Plan	II.D.4				
4) Available Equipment	II.D.5	(i)(5)(i)(F)		3218.2(b) FAQ 9 (CUW)	20(h)(3)(vi) 20(h)(7)(ii,iv)
3. Sustained Actions and Termination			33(b)	3218 (a-f) FAQ 7 (EPS)	
IIB. Site-Specific Information					
1. Site Identification		(i)(3)			
a. Site Name		(i)(3)(iii)(A)			

	EERP	**25 Pa. Code § 78a.55**	**25 Pa. Code § 91.33 § 91.34**	**Act 13 §§ 3215-3222**	**SPCC 40 CFR 112**
b. Physical Address		(i)(3)(i)			7(a)(4) 20(h)(2)
2. Site Maps & Drawings	II.A.1 II.C.1	(i)(5)(i)(G)		FAQ 9 (CUW)	7(a)(3) 20(h)(1)(viii) 20(h)(9)
3. Hazards					
a. Material and Waste Inventory	II.A.3	(a) (b) (i)(5)(i)(D)(I,II) (i)(5)(i)(G)		3222.1(b)(2) and (3) FAQ 2 (EPS)	7(a)(3)(i)
b. Material Compatibility	II.C.2			3218.2(a)(3) FAQ 8 (CUW) 3218.4 FAQ 8 (EPS)	7(c)(1) 8(c)(1) 9(c)(1)
c. Potential Spill Sources	II.C.1	(a) (b)			7(a)(3)(ii) 7(a)(5)(b) 8 9 10
III. Prevention Planning					
1. Hazard Assessment		(i)(5)(i)(G)	34(a) 34(b)	3215 FAQ 3 (EPS) FAQ 4 (EPS) 3217	112.20(h)(4)
2. Containment Systems & Practices	II.C.1		34(a) 34(b)	3218.2 FAQ 1 (CUW) FAQ 7 (CUW) FAQ 9 (CUW) FAQ 11 (CUW) FAQ 12 (CUW) FAQ 13 (CUW) FAQ 14 (CUW) FAQ 15 (CUW) FAQ 16 (CUW)	7(a)(3)(iii) 7(c) 8(b) 8(c) 9(b) 9(c) 10 20(h)(7)(iv)
3. Pressure Barrier Policy		(d)			
4. Inspection & Monitoring Program	II.C.3			FAQ 9 (CUW) FAQ 14 (CUW)	7(e) 8(c)(6) 8(d)(4) 9(b)(2) 9(c)(3) 9(c)(5)(i.ii) 9(c)(6)(ii,iii) 9(d)(1,2) 20(h)(8)(i)
5. Preventative Maintenance	II.C.4				9(d)(4)
6. Housekeeping Program	II.C.5				

	EERP	**25 Pa. Code § 78a.55**	**25 Pa. Code § 91.33 § 91.34**	**Act 13 §§ 3215-3222**	**SPCC 40 CFR 112**
7. Security	II.C.6	(i)(5)(i)(C)(V)			7(g) 20(h)(10)
8. External Factor Planning	II.C.7				
9. Waste Control & Disposal Methods		(a) (b)	(a) (b)		7(a)(3)(v) 20(h)(7)(iii)
10. Employee Training Program	II.C.8	(i)(5)(i)(H)			7(f) (20)(h)(8)(ii-iv)
11. Incident History	II.A.4				4(a)

Acronyms: **EERP -** Environmental Emergency Response Plans; **Act 13 –** 2012 Oil and Gas Act; **SPCC -** Spill Prevention, Control, and Countermeasure; **EPS –** Environmental Protections and Setbacks; **CUW –** Containment for Unconventional Wells