

Seneca Resources Corporation

Sespe Pipeline Oil Spill Contingency Plan

Financial Certificate Number: 2-2454-00-001

OSPR Control Number: P4-25-2725

Prepared by:

**Seneca Resources Corporation
2131 Mars Court
Bakersfield, CA 93308
(661) 399-4270**

Original Dated: 06/08

Revision: 09/09

Revision: 11/10

Revision: 5/13

Revision: 11/13

Seneca acquired Vintage's 2/3 interest in the pipeline on 23 April 2008, thus owning 100% and becoming the Operator.

**Seneca Resources Corporation
Sespe Pipeline Oil Spill Contingency Plan
November 2013 Summary of Revisions
OSPR Control Number: P4-25-2725 Financial Certificate Number: 2-2454-00-001**

November 26, 2013

Please replace the following pages in the plan:

Cover Sheet: Replace cover sheet
November 2013 Summary: Add page

Table of Contents: Entire Table

Section 1: 1-2 (agent change), 1-3 (add NCP and clarify ACP used), 1-4 (certifies NCP and ACP reviewed), 1-5 (adds Section 1.5, PLAN REVIEW and UPDATES), 1-6, 1-7, 1-8 (6-8 rennumbers pages.

Section 2: None

Section 3: 3-10, 3-11 (include ACP, BA/BE, and experience to determine onshore Resources at Risk), 3-12, 3-13, 3-14, 3-15, 3-16, 3-17 (to yearly foot patrols).

Section 4: None

Section 5: None

Section 6: None

Section 7: 7-7, 7-8

Section 8: None

Section 9: None

Section 10: None

Appendix A: None

Appendix B: None

Appendix C: None

Appendix D: None

Appendix E: None

Major changes since the May 2013 version are noted above. Update addresses "NEEDED ACTIONS" on Response Plan Sequence #1990 received as page 2 of the letter dated 11/12/13 from David K. Lehman with PHMSA to Jeff Holm with Seneca.



11/26/13

**Seneca Resources Corporation
 Sespe Pipeline Oil Spill Contingency Plan
 May 2013 Summary of Revisions**

OSPR Control Number: P4-25-2725 Financial Certificate Number: 2-2454-00-001

J. Jones
Keith Jones
5/28/13

May 28, 2013

Please replace the following pages in the plan:

Cover Sheet: Replace cover sheet

May 2013 Summary: Add page

Table of Contents: Entire Table

Section 1: 1-2, 1-3, 1-7 (Clean Seas contract renewal pages), 1-8 (OSPR Certificate of Financial Responsibility issued 6/1/12), add 1-9 OSPR approval of plan which expires March 31, 2018, add 1-10 contract with Patriot Environmental Services.

Section 2: 2-3

Section 3: 3-2, 3-7, 3-15, 3-16

Section 4: 4-3, 4-7, 4-8

Section 5: 5-2, 5-3,

Section 6: 6-1, 6-2, 6-3, 6-8, 6-11, 6-12, 6-13, 6-15, 6-17, 6-18, 6-19, 6-20, 6-21, 6-22, 6-26, 6-27, 6-28, 6-30

Section 7: 7-1, 7-3, 7-5, 7-6, 7-7, 7-8, 7-10

Section 8: 8-2

Section 9: None

Section 10: 10-8

Appendix A: A-3, A-4, A-5, A-6

Appendix B: Entire Section

Appendix C: C-4

Appendix D: D-1, D-2, D-3, MSDS sheets (5), D-4

Appendix E: E-7, E-13

Major changes since the November 2010 version include: a) Change in Seneca's Sespe Operations Supervisor. b) Obtaining new Certificate of Financial Responsibility in June 2012 from OSPR. c) Obtaining spill plan approval through 31 March 2018 from OSPR. d) Updating the PHA or Threat Analysis on 24 May 2013.

**Seneca Resources Corporation
Sespe Pipeline Oil Spill Contingency Plan
November 2010 Summary of Revisions**

OSPR Control Number: P4-25-2725 Financial Certificate Number: 22454-00-001

Jones
Keith Jones
11/28/10

November 24, 2010

Please replace the following pages in the plan:

**Cover Sheet: Replace cover sheet
November 2010 Summary: Add page
Table of Contents: 4-5, 5-5**

Section 1: 1-2, 1-7 (Clean Seas contract renewal pages), 1-8 (OSPR Certificate of Financial Responsibility issued 6/1/10)

Section 2: None

Section 3: 3-1, 3-2, 3-3, 3-4, 3-5, 3-6

Section 4: 4-3, 4-4, 4-5, 4-6, 4-7, 4-8, 4-9

Section 5: 5-2, 5-3

Section 6: 6-1, 6-2, 6-3, 6-7, 6-8, 6-15, 6-26

Section 7: Entire section

Section 8: 8-2

Section 9: None

Section 10: 10-8, add 10-9

Appendix A: A-7, remove Attachment A-1 (13 pages), add form ICS-208 (2 pages)

Appendix B: Entire Section

Appendix C: C-1, add ICS forms

Appendix D: D-2

Appendix E: E-7, E-9

Major changes since the September 2009 version include: a) OSPR approves that Seneca does not need to conduct any equipment deployment drills. b) Obtaining new Certificate of Financial Responsibility in June 2010 from OSPR. c) Including Patriot and Double Barrel as OSROs. d) Updating the PHA or Threat Analysis on 20 July 2010. e) Successfully hydrotesting the pipeline on 12 Oct 2010. f) Phone lists were updated in November 2010. g) Including ICS forms in the Plan.

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SECTION ONE: INTRODUCTION

1.1 FACT SHEET

Name of Facility	Sespe Pipeline
Business Address	2131 Mars Court Bakersfield, California 93308
Business Telephone	(661) 399 - 4270
Name and Address of Owner/Operator	Seneca Resources Corporation 2131 Mars Court Bakersfield, CA 93308
24-hr Answering Service	888 – 595 - 8595 (toll free)
Location of Facility	The pipeline starts in the Sespe Area of the Los Padres National Forest, NE 1/4 of NE 1/4 of Sec. 32, T5N, R19W, SBB&M, Ventura County, California. The pipeline trends westerly for nearly two miles, and then turns southerly and continues approximately 6.3 miles to the town of Fillmore in Ventura County, California.
Type of Facility	An unheated crude oil gathering and transfer pipeline. The pipeline has an outside diameter of 4.5 inches, with a 0.188-inch wall thickness API-SLx52 steel pipe.
Length of the Facility	Extends approximately 8.3 miles.
Throughput	1,376 BPD of oil.
Site Security	(b) (7)(F), (b) (3)

**Person to Contact
in Regard to Plan**

Keith Jones
 Sr. Technical Advisor
 Seneca Resources Corporation
 2131 Mars Court
 Bakersfield, California 93308
 (b) (6) (cell)
 (661) 399 - 7706 (fax)
 jonesk@srcx.com

**Agent for Service
of Process**

Ben Elmore
 Deputy General Counsel
 Seneca Resources Corporation
 1201 Louisiana, Suite 400
 Houston, Texas 77002-5604
 (713) 654-2662
 (713) 374 - 6310 (fax)
 elmoreb@srcx.com

**Financial Certificate
Number**

2-2454-00-001

1.2 QUALIFIED INDIVIDUAL AND DESIGNATED ALTERNATE

Primary Qualified Individual:	Chris McDermott
Designated Alternate for Qualified Individual:	Gary Crissman

(Refer to Appendix B, Table MCL-1 for address and telephone numbers.)

The Primary Qualified Individual is responsible for the call-out of the local cooperative and local resources (first tier). The Designated Alternate Qualified Individual is responsible for the full implementation of the Facility Response Plan. The Qualified Individual "on duty" will immediately notify the State Incident Commander of this transfer of responsibilities and authorities.

Seneca's' Primary Qualified Individual and Designated Alternate are English-speaking representatives of the lease. They are located in the United States, available on a 24-hour basis, and capable of arriving at the facility in a reasonable period but not later than 12hours.

The Primary Qualified Individual and Designated Alternate are thoroughly familiar with the implementation of this plan. They have been trained in the responsibilities and authority (see Table 1-1) of the Primary Qualified Individual and Designated Alternate under this plan and in those procedures necessary to implement the responsibilities and authority. They have knowledge and training or experience to demonstrate competence in the following:

- Applicable Federal OSHA standards for emergency operations (29 CFR 1910.120) and California OSHA standards for emergency response operations (Title 8 CCR 5192).
- How to implement the Facility Response Plan.
- Requirements of the National Oil and Hazardous Substance Pollution Contingency Plan (NCP), State Oil Spill Contingency Plan and the Sector LA/LB ACP4- North; 9813 Ventura County Area Contingency Plan (ACP), as required by Oil Pollution Act (OPA) 90.
- Spill prevention and response provisions and procedures of the plan.
- Resources committed or that could be potentially committed during an incident.
- Procedures for obtaining and obligating funds for response activities and persons (internal and external) to contact that would facilitate and expedite such actions.
- Ability to act as a liaison between the facility and the State Incident Commander and Federal On-scene Coordinator.
- Ability to assess the need for additional resources and to make the appropriate call-outs and contractual arrangements.

Seneca has determined that a spill from this pipeline could be expected to cause substantial harm. A worst-case discharge, as determined in Section Four, could release

(b) (7)(F), (b) (3) . The OSPR Response Planning Volume is (b) (7) bbl.

1.3 OIL SPILL RESPONSE ORGANIZATIONS

Seneca, as a member of the Clean Seas organization, has contracted with the necessary private personnel and equipment to respond, to the maximum extent practicable, to a

worst-case discharge or a substantial threat of such discharge. The agreement with the oil spill response organization named in the plan is provided at the end of this section.

1.4 PLAN STATEMENT

This Facility Response Plan has been adopted by Seneca Resources Corporation as owner/operator of the Sespe Pipeline in Ventura County, California. This plan has been prepared to comply with the requirements of Title 14, Division 1, Subdivision 4, Chapter 2, Subchapter 3, Sections 815-817 and 49 CFR 194. Seneca certifies that it has reviewed and is consistent with the NCP and the LA/LB Aera Contingency Plan (ACP) as required by 49 CFR 194.107(b).

Seneca fully supports the requirements of this plan which, when activated, will:

- Maximize the effectiveness and timeliness of oil spill response by Seneca and its response contractors.
- Ensure full readiness of equipment and personnel.
- Support coordination with federal, state, and other contingency plans.
- Provide improved protection of California marine waters and natural resources from the impacts oil spills.

Seneca will activate this plan according to the guidelines set forth herein. All employees are to become familiar with, and adhere to, the spirit and intent of this plan.

Should an oil spill occur as a result of Seneca's operations, Seneca would undertake actions as necessary to mount timely control and/or response operations. Seneca will strive for the protection of life and property both onsite and offsite in the event of a spill by employing response mechanisms, procedures, and processes which are technically sound and economically feasible. Seneca will not hesitate to notify the appropriate emergency forces in the event of a spill or the threat of a spill and will cooperate with all concerned governmental entities in the mitigation of emergencies and their impacts.

1.5 PLAN REVIEW and UPDATES

This Facility Response Plan will be reviewed using Drills as outlined in Section 10.

Plan updates will be completed by Seneca Resources Corporation as needed however, the time between updates shall not exceed 24 months.

The List of Contacts will be reviewed and updated by Seneca Resources Corporation as needed however, the time between updates shall not exceed 8 months.

TABLE 1-1: RESPONSIBILITIES AND AUTHORITY OF THE QUALIFIED INDIVIDUAL AND DESIGNATED ALTERNATE

RESPONSIBILITIES AND AUTHORITY
Implement the Facility Response Plan for the Sespe Pipeline.
Activate and contract with all necessary oil spill removal organizations.
Initiate immediate communication with the Federal On-Scene Coordinator and State Incident Commander.
Act as liaison with and follow the orders of the designated Federal On-Scene Coordinator.
Obligate, either directly or through prearranged contracts, any funds required to carry out all necessary or directed oil response activities.
Act as liaison with federal, state, and local officials.
Respond directly to and immediately with news media representatives on behalf of Seneca.
Review and approve all press releases and statements.
Approve all response plans for Seneca and the ordering and release of sources.
Develop strategic response objectives and direct overall response operations.
Assume the role of the Incident Commander of the Spill Management Team if activated.
Notify Seneca management, response personnel and government agencies, as appropriate.

Certification Statement

"I certify, to the best of my knowledge and belief, under penalty of perjury under the laws of the State of California, that the information contained in this contingency plan is true and correct and that the plan is both feasible and executable"



Barry McMahan
Sr. Vice President

P1A

7-14-08

Date



Clean Seas LLC - 990 Cindy Lane, Unit B - Carpinteria, CA 93013-2900 - 24 Hr. (805) 684-3838 • Fax: (805) 684-2650
G. E. "Ke" Reed
General Manager

February 7, 2013

RECEIVED

FEB 12 2013

SENECA RESOURCES

Mr. Keith Jones
Seneca Resources Corporation
2131 Mars Court
Bakersfield, CA 93308

Re: Sespe Pipeline

Dear Mr. Jones:

Thank you for your payment of \$16,600 for your Contract Associate Fees for the period 01/01/13 through 12/31/13.

The "Certificate of Contractual Services" for the facility is enclosed.

A letter and a copy of the certificate will be sent to the Office of Spill Prevention and Response within the State of California notifying them of the services under contract.

If you have any questions you can contact Pat Elliott at (805) 684-3838 ext. 105.

Sincerely,

Enclosures

\\C:\Contracts and Attachments\Contract Associates\Contract Associates\2013\Seneca Resources Corporation\2013 Form 13 & 1213.doc

CERTIFICATE OF CONTRACTUAL SERVICES

CLEAN SEAS, LLC

Issued to:

SENECA RESOURCES CORPORATION

as a Contract Associate of Clean Seas, LLC for the operation of its facility, **SESPE PIPELINE**, in Clean Seas' Area of Response Seaward of the Contiguous Zone in accordance with the Clean Seas Contract Response Agreement extended as of January 1, 2013. The contractual services provided by the Contract Response Agreement shall remain in effect until properly terminated or December 31, 2013, whichever shall first occur.

CLEAN SEAS, LLC
Carpinteria, California

By: 

Name: G.E. Ikerd

Title: General Manager

Dated: February 7, 2013



COPY

Clean Seas LLC • 990 Cindy Lane, Unit B • Carpinteria, CA 93013-2900 • 24 Hr.: (805) 684-3838 • Fax: (805) 684-2650

G. E. "Ike" Ikerd
General Manager

February 7, 2013

Thomas Cullen, Administrator
CA Dept of Fish & Wildlife, OSPR
1700 K. Street, Suite 250
Sacramento, CA 95814

**RE: Seneca Resources Corporation
SESPE PIPELINE**

This letter will confirm that oil spill response services for the above named facility have been contracted with Clean Seas LLC through December 31, 2013. Such response will be under the terms and conditions set forth in the "Contract Response Agreement".

Enclosed is a copy of the "Certificate of Contractual Services" issued to **Seneca Resources Corporation**.

Sincerely,

Enclosures

ARTICLE XIII

EXECUTION

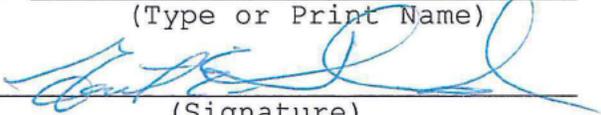
Each Party warrants by the signature of its authorized representatives that all approvals and consents necessary for its full and faithful performance of all the terms and conditions of this Agreement has been obtained prior to execution hereof and no further approvals or consents are necessary or required.

IN WITNESS WHEREOF, each Party hereto has caused this Agreement to be executed by its duly authorized officer or attorney-in-fact as of the date and location written beneath the signature of each Party.

CLEAN SEAS, LLC

Dated: 12/12/08

By: Gail E. Ikerd, General Manager
(Type or Print Name)


(Signature)

1180 Eugenia Place, Suite 204
Carpinteria, CA 93013

CONTRACT ASSOCIATE

Dated: 11/18/08

By: BARRY MCMAHAN
(Type or Print Name)


(Signature)

SENECA RESOURCES CORPORATION
(Company)

1201 LOUISIANA, SUITE 400
(Mailing Address)

HOUSTON, TX 77002

P/E



28 May 2013

Memo to Sespe Pipeline Oil Spill Contingency Plan Manual
For Department of Fish and Game, Office of Spill Prevention and Response
Control Number: P4-25-2725

The included Certificate of Financial Responsibility No.: 2-2454-00-001 issued
June 1, 2012 and expiring on May 31, 2014 is a true and accurate copy of the original
Certificate.

The original Certificate is at Seneca's Bakersfield Office.

BElliott by *K. Jones*
Brad Elliott
Vice President, West Division
661-391-3545



CALIFORNIA CERTIFICATE OF FINANCIAL RESPONSIBILITY (CA COFR)

OWNER OR OPERATOR:

SENECA RESOURCES CORPORATION

meets the financial responsibility requirements set forth in the Government Code Sections 8670.37.53 as it applies to the operation of

NAME:

SESPE PIPELINE LOS PADRES NATIONAL FOREST

LOCATION:

VENTURA COUNTY, CALIFORNIA

CERTIFICATE: 2-2454-00-001

CONTROL #: FA487

ISSUED DATE: June 01, 2012

EXPIRATION DATE: May 31, 2014

The holder of this document named above is subject to the provisions of California Code of Regulations, Title 14, Sections 791-797, implementing the financial responsibility requirements set forth in the Lempert-Keene-Seastrand Oil Spill Prevention and Response Act (Act). This certificate holder has provided the necessary evidence of financial responsibility mandated by these requirements.

For the purpose of determining liability pursuant to the Act, this Certificate of Financial Responsibility is conclusive evidence that the person or entity holding the certificate is the party responsible for the specific Marine Facility.

No alterations of this certificate are permitted after issuance by the Administrator of OSPR. If there is a change in the name or ownership of the Marine Facility, the certificate holder must notify the Office of Spill Prevention and Response (OSPR) immediately. If the certificate expires, a new certificate will be required.

This certificate remains valid as long as the current method for demonstrating financial responsibility is maintained (eg. insurance). Any changes in this status must be reported to OSPR immediately.

It is the owner or operator's responsibility to ensure that this certificate number is also included in the owner or operator's marine oil spill contingency plan, which must be submitted to this office for approval, before operating in a location where a spill could impact California marine waters.

If you have any questions, please contact

Farina A. Khan

916-327-9937

Sincerely,

Farina A. Khan

Financial Analyst

Office of Spill Prevention and Response

cacofr-facilities@ospr.dfg.ca.gov





State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Office of Spill Prevention and Response
 4665 Lampson Ave, Suite C
 Los Alamitos, CA 90720
 Telephone: (562) 342-7212
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
 CHARLTON H. BONHAM, Director



March 31, 2013

Seneca Resources
 Keith Jones
 2131 Mars Court
 Bakersfield, CA, 93308

RECEIVED

MAR 26 2013

SENECA RESOURCES

Dear Mr. Jones

Your California Facility Oil Spill Contingency Plan has been reviewed for compliance with the California Code of Regulations Title 14, Subchapter 3, Sections 815, 816, and 817. Based on this review the following plan is approved:

Seneca Resources

Control Number: P4-25-2725

A copy of this letter should be kept on the facility covered by this contingency plan. **This approval expires on March 31, 2018.**

Your California Facility Oil Spill Contingency Plan must be kept current at all times. Promptly send plan revisions to all plan recipients. When submitting plan revisions to OSPR, use the letterhead address, with "attention: Marine Safety Branch."

The current California regulations regarding Oil Spill Contingency Plans can be located through the internet at:

<http://www.wildlife.ca.gov>

We appreciate your efforts to improve the safety of California's marine environment. If you have any questions regarding this approval, contact Mr. Dennis Chastain, at telephone number (562)342-7224 or by e-mail at dennis.chastain@wildlife.ca.gov.

Sincerely,

Jon Victoria
 Field Supervisor, Marine Safety Branch
 Office of Spill Prevention and Response

cc: Mr. Dennis Chastain
 Mr. Ted Mar

1-9

-WORK ORDER NO. GC2488
Seneca Resources Corporation
2131 Mars Court, Bakersfield, CA 93308
Phone: 661-399-4270 · Fax: 661-768-4995

CONTRACTOR

Patriot Environmental Services
1900 W. Anahiem Street
Long Beach, Calif 90813
562-436-2614

WORK LOCATION

X Kern County, Ventura, California

WORK DESCRIPTION

For environmental cleanup, tank cleaning etc.
Seneca contacts: Gary Crissman 661-619-9928

WORK PRICING

All bills mailed to above address must show PO # GC248

MATERIALS PRICING

Per current rate schedule.

ACCEPTANCE OF THIS OFFER TO PROCURE WORK IS LIMITED TO THE TERMS OF THIS WORK ORDER INCLUDING THOSE ON THE REVERSE SIDE WHICH CONTAIN INDEMNITIES WITHOUT REGARD TO FAULT AND SUCH ACCEPTANCE MAY BE MADE BY INITIATING PERFORMANCE OF THE WORK FOR THE BENEFIT OF SENECA OR SIGNING AND RETURNING A COPY OF THIS ORDER TO SENECA.

OFFERED BY SENECA



AUTHORIZED REPRESENTATIVE

Gary Crissman


NAME

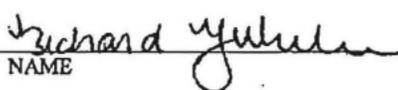
Operations Manager West

TITLE

ACCEPTED BY CONTRACTOR

Richard Yukihiro

AUTHORIZED REPRESENTATIVE


NAME

Chief Operating Officer

TITLE

1-10

TERMS AND CONDITIONS

1. **INDEPENDENT CONTRACTOR.** Contractor is, and shall perform its work hereunder, as an independent contractor under its own management, supervision, direction and control as to the means and methods of performing the work but the results of the work shall, to Seneca's complete satisfaction, meet or exceed the provisions of this Order. Contractor and its employees, agents and representatives are not employees, agents or representatives of Seneca and this Order does not create an association, joint venture or partnership between Contractor and Seneca.
2. **WARRANTIES.** Contractor warrants that Contractor has the right to agree to this Order and Contractor further warrants:
- that Contractor is qualified to perform the work and has all required permits, certifications and licenses;
 - that the work will be performed in a good and workmanlike manner without defects in design, material or workmanship in accordance with the plans and specification and in accordance with good oilfield practice and standards;
 - that Contractor, in performing the work, shall observe and comply with all applicable Federal, state and local laws, rules, regulations and ordinances including, without limitation, the Fair Labor Standards Act of 1938, Title VII of the Civil Rights Act of 1964, the Rehabilitation Act of 1973, the Vietnam Era Veterans Readjustment Assistance Act of 1974, Executive Order 11246, and the Occupational Safety & Health Act of 1970, as any of the foregoing are amended, together with regulations promulgated pursuant thereto, and all required provisions of the foregoing are hereby incorporated herein by reference, as if set forth herein word for word;
 - that Contractor will observe and comply with Seneca's safety and security policies in performance of the work and Contractor hereby acknowledges receipt of the same;
 - that the work will be timely completed inasmuch as time is of the essence of this Order;
 - that pricing of the work and materials will be competitive in the industry;
 - that Contractor's performance of the work and Seneca's purchase or use of the results of the work does not infringe any intellectual property right of third parties and Contractor shall defend and indemnify Seneca and any user of the results of the work from any claims, causes of action or liabilities alleging such infringement;
 - that, at any time prior to 12 months after completion of the work, the work is or becomes defective or deficient or fails due to defect in design, material or workmanship or otherwise fails to meet the requirements of this Order, then Contractor shall make good every such defect, deficiency or failure and at Seneca's option repair or replace the work without cost to Seneca and whereupon such warranty period for such warranty work shall start anew.
3. **OWNERSHIP.** All work or materials developed or provided by Contractor under this Order shall be deemed to be work made for hire and such work and any work derived therefrom shall be owned exclusively by Seneca including without limitation the source code, the program code and any intellectual property rights including without limitation any copyrights. In the event such work or materials may not, by operation of law, be work made for hire, Contractor hereby assigns to Seneca an irrevocable, worldwide, royalty free license to practice all rights (including without limitation all intellectual property rights) in such work and materials together with the right to grant sublicenses. All materials, including without limitation, plans, specifications, tools, special dies and patterns, furnished or specifically paid for by Seneca, shall be the property of Seneca, shall be returned to Seneca when no longer required hereunder, shall be used only to complete this Order, and shall be segregated and clearly identified as property of Seneca. Contractor assumes all risk and liability for loss or damage thereto, except for normal wear, and agrees to permit inspection and supply detailed statements of inventory upon request of Seneca.
4. **INDEMNIFICATION.** IN VIEW OF THE RELUCTANCE OF THE COURTS IN SOME JURISDICTIONS TO ENFORCE PROVISIONS BY WHICH A PARTY IS INDEMNIFIED FOR AND AGAINST ITS OWN NEGLIGENCE OR OTHER BREACH OF DUTY, THE PARTIES, UNLESS EXPRESSLY STATED IN THIS ORDER TO THE CONTRARY, ALLOCATE AND DIVIDE BETWEEN THEMSELVES, THROUGH INDEMNITIES, RELEASES AND LIMITATIONS HEREIN, THE CONTRACTUAL, TORTIOUS AND STATUTORY RISKS AND BURDENS ARISING FROM THIS ORDER AND ANY OBLIGATION OF PERFORMANCE THEREOF WITHOUT REGARD TO THE SOLE OR CONCURRENT, ACTIVE OR PASSIVE NEGLIGENCE OF ANY DEGREE OR PER SE, FAULT OR STRICT LIABILITY OF OR A CONTRACTUALLY ASSUMED OBLIGATION OF OR OTHER BREACH OF CONTRACTUAL OR STATUTORY OR REGULATORY DUTY OR WARRANTY BY THE INDEMNITEE, ITS AGENT OR EMPLOYEE OR AN INDIVIDUAL CONTRACTOR DIRECTLY RESPONSIBLE TO THE INDEMNITEE. SENECA SHALL NOT BE RESPONSIBLE FOR AND CONTRACTOR SHALL RELEASE, DEFEND AND INDEMNIFY SENECA AND ITS JOINT INTEREST OWNERS AND ITS OTHER CONTRACTORS AND ITS AND THEIR EMPLOYEES FROM AND AGAINST ANY AND ALL CLAIMS, CAUSES OF ACTION AND LIABILITIES ARISING FROM:
- ANY PERSONAL INJURY, ILLNESS OR DEATH OF OR LOSS OF OR DAMAGE TO PROPERTY (INCLUDING WITHOUT LIMITATION RENTAL PROPERTY) OF CONTRACTOR OR ITS SUBCONTRACTORS OR ITS OR THEIR EMPLOYEES UNLESS CAUSED BY THE SOLE NEGLIGENCE OR WILLFUL MISCONDUCT OF SENECA;
 - ANY PERSONAL INJURY, ILLNESS OR DEATH OF OR LOSS OF OR DAMAGE TO PROPERTY (INCLUDING WITHOUT LIMITATION RENTAL PROPERTY) ARISING FROM CONTRACTOR'S OBLIGATION OF PERFORMANCE OF THIS ORDER UNLESS CAUSED BY THE SOLE NEGLIGENCE OR WILLFUL MISCONDUCT OF SENECA;
 - ANY TAXES OR OTHER PAYMENTS OWED BY CONTRACTOR TO ANY GOVERNMENTAL AGENCY AS A RESULT OF THIS ORDER OR CONTRACTOR'S OBLIGATION OF PERFORMANCE OF THIS ORDER;
 - ANY COMPENSATION OWED TO ANY EMPLOYEE OR SUBCONTRACTOR OR SUPPLIER FOR WORK PERFORMED HEREUNDER OR ANY DETERMINATION THAT CONTRACTOR IS NOT AN INDEPENDENT CONTRACTOR HEREUNDER;
 - ANY LIEN, PRIVILEGE OR OTHER ENCUMBRANCE ON PROPERTY OF THOSE INDEMNIFIED ARISING OUT OF CONTRACTOR'S PERFORMANCE HEREUNDER.
5. **INSURANCE.** In the event that Chapter 127 of the Texas Civil Practice & Remedies Code applies to this Order, Contractor agrees that its foregoing indemnity obligation shall be supported by liability insurance coverage to be furnished by Contractor in the maximum amount allowed by such code provision. Otherwise, insurance coverage provided by Contractor shall not limit Contractor's liability under this Order. At no extra cost, Contractor shall provide with insurance carriers acceptable to Seneca the following insurance coverage:
- Comprehensive General Liability Insurance in the amount of at least \$500,000 combined single limit with contractual liability endorsement covering this Order, cross liability endorsement, waiver of subrogation against Seneca and its joint interest owners and its other contractors and its and their employees and naming as additional insured Seneca and its joint interest owners and its other contractors and its and their employees.
 - Automobile Liability Insurance covering owned and non-owned automobiles in the amount of at least \$500,000 with waiver of subrogation against Seneca and its joint interest owners and its other contractors and its and their employees and naming as additional insured Seneca and its joint interest owners and its other contractors and its and their employees.
 - Workers' Compensation Insurance in the statutory amount and Employer's Liability Insurance in the amount of at least \$500,000 with alternate employer endorsement and waiver of subrogation in favor of Seneca and its joint interest owners and its other contractors and its and their employees. The parties recognize, acknowledge and agree that the work being performed by Contractor is part of Seneca's trade, business or occupation and that whenever the Louisiana Workers' Compensation Act may be applicable, the employees of Contractor and its subcontractors, if any, whether direct, statutory, borrowed or otherwise, are statutory employees of Seneca in accordance with the Louisiana Worker's Compensation Act and the protections afforded a statutory employer under Louisiana law shall apply. Irrespective of Seneca's status as the statutory employer of Contractor's employees, Contractor agrees to remain primarily responsible through its insurance for the payment of benefits under the Louisiana Workers' Compensation Act to its employees.
 - Excess Liability Insurance in the amount of at least \$500,000 over the above insurance with the same respective endorsements.
6. **CONFIDENTIALITY.** Contractor may be provided or otherwise learn Seneca's and/or its joint working interest owners' oral or written, confidential, proprietary and/or trade secret business and/or technical information and/or know-how and Contractor may only use such information and/or know-how for performance of the work and Contractor shall keep such information and/or know-how confidential and not disclose the same to others, other than Contractor's employees or subcontractors who have a need to know and have signed an obligation of confidence covering such information and/or know-how. Upon completion of the work, termination of the Order or upon demand by Seneca, Contractor shall return all writings reflecting such information and/or know-how. Contractor may not publicize or use the name or trademark of Seneca without Seneca's prior written consent. The foregoing obligations shall survive completion of the work.
7. **WORK SITE.** Prior to beginning, and thereafter during, the performance of the work, Contractor shall carefully inspect the work site to make certain that the same is safe for Contractor and its subcontractors and its and their employees to work. Contractor shall provide all safety equipment and supplies necessary or desirable for the work. Contractor shall provide Seneca and its other contractors Material Safety Data Sheets for all materials Contractor brings on to the work site. Without charge to Seneca, Contractor shall clean up the work site after completion of the work and return all unused materials for refund to Seneca.
8. **RECORDS.** Contractor shall maintain complete and adequate records of its work hereunder for a period of five (5) years after completion and Seneca may at any reasonable time inspect, audit and copy any such records save and except Contractor's trade secrets. Any overcharges as a result of such inspection and auditing shall be promptly refunded to Seneca without regards to limitations, laches or prescription.
9. **TERMINATION.** Seneca may immediately terminate this Order without cause upon ten (10) days prior written notice to Contractor. If a party is in default of any provisions in this Order, the other party may terminate this Order upon ten (10) days prior written notice to the party in default if the default is not cured within said ten (10) day period. Upon termination of this Order, Contractor shall cease all work and shall promptly provide Seneca, without additional cost to Seneca, all materials in connection with this Order. In no event shall Seneca or its joint working interest owners be liable to Contractor or its subcontractors for incidental or consequential damages. The rights and obligations of the parties, which by their nature, are normally intended to survive the termination or completion of an agreement similar to this Order shall remain in full force and effect following termination of this Order for any reason.
10. **ENTIRE AGREEMENT.** This Order is the entire agreement between the parties with respect to the subject matter hereof and hereby cancels and abrogates any previous oral or written representation or agreement between the parties concerning the subject matter hereof. This Contract may not be modified, supplemented, explained or waived by parol evidence, Contractor's quote, ticket or other business form, custom or a course of dealing or performance, the failure of Seneca to insist on strict performance of Contractor or in any other way, except in writing signed by an authorized representative of Seneca. Any references in this Order to Contractor's Proposal or Quotation are only to describe the materials or work covered hereby and do not constitute an acceptance of any terms set forth therein. The headings herein are for convenience only and shall not be construed to enlarge or limit the provisions hereof.

SECTION TWO: FACILITY DESCRIPTION

2.1 FACILITY DESIGN AND OPERATIONS

2.1.1 Facility Diagrams

Facility diagrams for the Sespe Pipeline are provided in Appendix D of this manual and include:

- Sespe Crude Pipeline Route
- Sespe Crude Pipeline, Pump and Tank Site

The pipeline has been operational since the 1950's.

2.1.2 Material Safety Data Sheets

Material Safety Data Sheet for crude oil is provided in Appendix D of this manual.

2.1.3 Transfer Procedures

Pumping occurs from 0700 to 1500 hours, seven days per week.

2.1.4 Hours of Operation

The pipeline operates 8 hours a day, seven days per week and is manned 8 hours per day.

2.1.5 Lease and Facility Description

2.1.5.1 Introduction

The risk and hazards analysis (see Section 3.1) determined that the pipeline was well monitored, which should be adequate to prevent accidental releases from reaching marine waters. However, the potential for a release cannot be completely eliminated. A comprehensive description of the lease area and facilities is provided below.

2.1.5.2 Lease Description

The legal description for the Sespe Pipeline is provided in Table 2-1.

2.1.5.3 Facility Description

The Sespe Pipeline originates in the Sespe Area of the Los Padres National Forest, NE 1/4 of NE 1/4 of Sec. 32, T2N, R19W, SBB&M, Ventura County, California. The pipeline trends westerly for nearly two miles and then turns southerly and continues approximately 6.3 miles to its terminus at a tie-in of a Crimson 8-inch oil pipeline in the town of Fillmore.

The pipeline is welded steel pipe (API-5L x 52) with a 4.5-inch outside diameter and a 0.188-inch wall thickness. The pipeline was constructed in accordance with API Bulletin 1105, entitled "Construction Practices for Oil and Products Pipelines", and all welded joints were made by welders certified per API Specification 1104, entitled "Standard for Welding Pipelines and Related Facilities."

The line is essentially a buried line with 30 inches of cover and coated with Pacific Coast No. 2 Somastic coating of standard thickness for 4.5-inch pipe. The line is cathodically protected to protect against corrosion. In the National Forest and adjoining areas of rough terrain, the pipeline is laid above grade without cover. Some crossing of streambeds, ravines and barricades are above ground with the pipe supporting itself or being supported on "A" frames. Other crossings are underground.

The line is equipped with scraper launchers and receivers for line cleaning operations. Full line size block valves are installed in the pipeline at selected intervals to isolate sections of the line in case of emergency.

At a distance of approximately 3.4 miles out from the Sespe Swing Tank and pump, a lateral ties in to the main pipeline. Laterals connect to the line from Thompson and Hall.

No storage tanks are provided at the Sespe Swing Tank location. Crude oil to be transported via the pipeline is received into two central balance tanks (also known as the Swing Tanks) for automatic shipment in the pipeline. Crude oil production is received into the Swing Tanks from producer's tanks that have been gauged in gauge tanks or by automatic custody transfer equipment both owned by the producers. An electric motor-driven reciprocating pump takes suction from the swing tanks and discharges into the pipeline. The pump operates from 0700 to 1500 hours, discharging approximately 172 BOPH into the pipeline.

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

In the event of an extremely high liquid level in the tanks, a warning light is lit and the pump continues to operate. In the event of a very low liquid level in the tanks or low suction pressure, the pump is shut off automatically. When the incoming liquid causes the level to rise to 5 feet and 1 inch, the pump automatically resumes operations.

Daily the volume of oil pumped through a positive displacement meter installed on the discharge line of the pump at the Swing Tanks is compared to the volume received at the Crimson purchase meter in Fillmore.

TABLE 2-1: SESPE PIPELINE LEASE DESCRIPTION

<u>Lease No.</u>	<u>Lessor</u>	<u>Lessee</u>	<u>Date</u>	<u>Recording Book/Page</u>	<u>County</u>	<u>State</u>
9749	United States of America (037880a) As amended by Renewal Lease of Oil and Gas Lease As amended by Renewal Oil and Gas Lease As amended by Renewal Oil and Gas Lease	Alonzo Burdge	10/17/34 03/01/56 03/01/76 03/01/76	184/035 2781/460	Ventura Ventura	CA CA
9707	United States of America (071446) As amended by Renewal Lease As amended by Renewal Lease As amended by Renewal Lease As amended by Renewal Lease	Alonzo Burdge	10/17/34 03/01/56 03/01/66 03/01/76 03/01/86	184/935 N/A N/A N/A N/A	Ventura	CA
9785	United States of America (LA-0123733)	Robert F. Lynn	10/01/55	N/A	Ventura	CA
9780	John L. Orcutt and Thomas F. Stephens	Shell Oil Company	01/02/65	2823/313	Ventura	CA
9727	United States of America (LA-0135006)	Harold J. Hansen, et al.	02/01/56	N/A	Ventura	CA
7695	United States of America (CA-4971)	Jack M. Chodar	11/01/78	N/A	Ventura	CA
9710	Union Oil Company of California	James A. Lewis	08/26/58	1649/489	Ventura	CA
21303	United States of America (CA-22332)	Santa Fe Energy Co.	11/01/88	N/A	Ventura	CA
16305	The Los Angeles Oil Company	James A. Lewis	08/26/58	1649/479	Ventura	CA
9748	United States of America (LA-037880B) As amended by Renewal Lease As amended by Renewal Lease As amended by Renewal Lease	Alonzo Burdge	07/29/36 11/01/61 11/01/71 11/01/81	184/035 2785/517 4655/849 Unrecorded	Ventura Ventura Ventura	CA CA CA
9747	The Bank of California, Trustee Arthur A. Henzell, Trustee, and Marie Thornbury As amended by Letter Agreement	Westates Petroleum Co.	03/01/75 05/09/90	4461/319 N/A	Ventura	CA
9658	United States of America (LA 0123572-A)	Malcolm McDuffie	10/01/55	N/A	Ventura	CA
7688	United States of America (LA-0155952)	James P. Witmer	06/01/60	3142/290	Ventura	CA
7684	United States of America (R-06307)	Shell Oil Company	04/01/65	2742/315	Ventura	CA
7685	United States of America (043561a) As amended by Exchange Lease	Effie V. Bonebrake, Percy L. Bonebrake, J.F.T. O'Connor & Neil S. McCarthy	04/18/39 04/01/59	Unrecorded Unrecorded		

TABLE 2-1: SESPE PIPELINE LEASE DESCRIPTION (Cont'd)

<u>Lease No.</u>	<u>Lessor</u>	<u>Lessee</u>	<u>Date</u>	<u>Recording Book/Page</u>	<u>County</u>	<u>State</u>
7686	United States of America (04351b) As amended by Renewal of Oil and Gas Lease	Effie V. Bonebrake, Percy L. Bonebrake, J.F.T. O'Connor & Neil S. McCarthy	04/18/39 11/01/81	184/015 N/A	Ventura	CA
7687	Nellie Arundell As amended by Modification of Oil and Gas Lease As amended by Letter Agreement As amended by Amendment of Oil and Gas Lease As amended by Agreement As amended by Modification of Oil and Gas Lease As amended by Letter Agreement As amended by Extension of and Amendment to Oil and Gas Lease As amended by Amendment to Oil and Gas Lease	C. R. Price	12/21/64 06/08/66 08/28/67 09/16/68 10/27/68 11/19/69 09/02/70 07/26/71 10/05/76 10/30/81 06/05/84 01/02/90	2722/439 3195/303 N/A 3379/580 N/A 3600/320 N/A 3885/262 N/A File #011328 N/A N/A	Ventura Ventura Ventura Ventura Ventura Ventura Ventura	CA CA CA CA CA CA CA
9692	Fillmore Oil Company, Ltd.	Paul E. Terry and Paul L. Hayes	01/01/60	1826/254	Ventura	CA

Normal operating pressure of the Sespe pump discharge pressure varies between 130 and 170 psig, which results in a throughput rate of approximately 172 BOPH. Discharge pressures creeping up higher than 200 psig without corresponding increase in throughput rate indicate a blockage in the line and are investigated immediately. Conversely, a drop in pressure below approximately 130 psig without a corresponding reduction in throughput rate would indicate a major leak or break in the pipeline. Under these circumstances, the leak would be located in the first mile and one half of pipeline from the Sespe pump.

The summit of the pipeline route is approximately 1.5 miles out from the Sespe pump. The pressure of 130-170 psi is sufficient to lift the oil to the summit. From this point, the oil flows by gravity to the Crimson 8-inch oil line in Fillmore.

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

. A lateral from Hall's lease ties into the main pipeline at the

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

in the event of an unintended valve closure at the tie-in to the Crimson pipeline.

2.2 FACILITY SITE

2.2.1 Site Drainage

The pipeline parallels Sespe Creek for about five miles while it traverses Goodenough Road. It is possible that a release along this segment could reach the Sespe Creek, which flows to the Santa Clara River. A release in the City of Fillmore could enter storm drains that also empty into the Santa Clara River. The Santa Clara River drains to the Pacific Ocean. The lower part of the river is confined by levees and the mouth lies within McGrath State Beach.

2.2.2 Surrounding Area

Land in the vicinity of Sespe Pipeline is both publicly and privately owned. The upper reaches of the line are in Los Padres National Forest. Uses of privately held land include rural residential, agricultural, and urban.

The Santa Clara River Valley includes a number of steep-sided perennial and ephemeral barrancas and stream channels. Significant stretches of riparian woodland, freshwater marsh and in-stream freshwater habitat occur intermittently along the length of the Santa Clara River.

Sensitive wildlife that are known or suspected to breed along the Santa Clara River include California red-legged frog, southwestern pond turtle, San Diego horned lizard, coastal western whiptail, two-striped garter snake, Cooper's hawk, black-shouldered kite, western yellow-billed cuckoo, southwestern willow flycatcher, tree swallow, loggerhead shrike, least Bell's vireo, yellow warbler, yellow-breasted chat, blue grosbeak, tricolor blackbird, and San Diego black-tailed jackrabbit. Although there are historic records of bank swallows, coastal California gnatcatchers, coastal cactus wren, and yellow-billed cuckoo from several locales along the Santa Clara River valley, there does not appear to be suitable breeding habitat for any of these species today in the immediate vicinity of the river. Other transient sensitive wildlife observed along the Santa Clara River include white-faced ibis, osprey, merlin, California least tern, and

black swift.

The mouth of the Santa Clara River contains the Santa Clara River Estuary, one of three coastal estuaries found in Ventura County. Wetland and riparian habitats at the mouth of the Santa Clara River provide important roosting, foraging, and/or breeding habitat for a variety of sensitive wildlife. Sensitive animals known or expected to breed in or adjacent to the Santa Clara River estuary include southwestern pond turtle, black-shouldered kite, western snowy plover, and Belding's savannah sparrow. Other sensitive wildlife observed foraging or roosting at the Santa Clara River Estuary include brown pelican, white-faced ibis, western coast bittern, Cooper's hawk, sharp-shinned hawk, osprey, peregrine falcon, prairie falcon, merlin, California black rail, mountain plover, long-billed curlew, California gull, California least tern, elegant tern, black skimmer, western yellow-billed cuckoo, black swift, southwestern willow flycatcher, bank swallow, tree swallow, loggerhead shrike, least Bell's vireo, yellow warbler, yellow-breasted chat, blue grosbeak, large-billed savannah sparrow, and tricolored blackbird (California Public Utilities Commission, Pacific Pipeline Project EIR, September 1993). (See also Clean Seas Regional Resource Manual Section 303, Table CS-23 and associated map for additional Santa Clara River Estuary resource description.)

2.2.3 Hydrographic And Climatic Conditions

2.2.3.1 Climate

The climate of the South Central Coast is typified by mild, wet winters (November to April) and warm, dry summers, (May to October). Winds are normally light to moderate. Three regional features influence this climate: the persistent Pacific high-pressure system, the Pacific Ocean, and the coastal topography. The Pacific high-pressure system is strongest during the summer when it remains stationed offshore and produces dry weather, a stable atmosphere, and strong, persistent inversions. The high-pressure system then migrates southward in winter, allowing Pacific storms to bring rain to the region. The Pacific Ocean moderates air temperatures above it, producing strong sea breezes, especially during the summer, and minimizes temperature variations. Topography has a strong influence upon temperature, precipitation, and wind flow.

2.2.3.2 Precipitation

Spring and autumn are transitional periods of respective decreasing and increasing precipitation frequencies. Onshore, the period from November through April is relatively wet and cool, with 90 percent of precipitation occurring in these months. The least precipitation occurs along the coast, but increases to as much as 30 inches in the higher mountains. Storms that approach from the southwest carry significant subtropical moisture and can produce heavy rains, flooding, and coastal swells. Storms from the northwest are generally cooler and result in lighter rainfall. Rainfall averages about 15.6 inches per year and varies from 8.7 inches or less to more than 28 inches about once every 10 years.

2.2.3.3 Humidity, Clouds, And Visibility

Over the ocean, the diurnal variation in humidity is small, about 4 percent. Mean relative humidity is about 80 percent, where relative humidity is defined as the amount of water vapor in the air compared to the greatest amount that could be present at that temperature, expressed as a percent. Along the coast, relative humidity varies between 50 percent during the day to over 80 percent at night. During the spring and summer months, upwelling of cold ocean coastal waters produces fog along the coast. Low stratus clouds may form as a result of moisture being trapped below temperature inversions produced in the lower atmosphere as a result of subsidence motion. As a result, fog is reported along the coast about 20 percent of the time in the summer. The area averages about 70 cloudy days a year.

2.2.3.4 Temperature

Seasonal mean temperatures offshore range from 56°F in the winter to 62°F in the summer. Temperatures vary considerably over land as a result of the rugged terrain and proximity of the Pacific Ocean. In general, temperatures are mild along the narrow coastal plain, with small daily and annual ranges. Temperatures below freezing are rare as are those in excess of 100°F. Maximum temperatures in July average in the upper 60's or low 70's along much of the coast. In January, the minimum temperatures average in the mid 40's along the coast.

2.2.3.5 Regional Wind Patterns

Synoptic pressures produce a regional prevailing northwesterly to westerly flow throughout the year. The basic flow reverses to a prevailing southeasterly direction under winter pre-storm conditions. Circulation and winds along the coast are largely affected by the strength of the pressure gradient between the Pacific high-pressure cell located to the west and the relative positions of the thermal low to the east. The position and strength of the Pacific high cell in summer effectively steers most storms away to the north and weakens them.

The wind regime along the exposed coastline and on the mountain ridges in the area generally conforms closely to that of the basic circulation, since terrain influences are minimal at these locations. Outside the coastal zone, the rugged and varied terrain of the area deflects the basic wind circulation. Thus, wind direction and wind speed within the area are mostly a result of local terrain influences rather than prevailing circulation.

In major valleys, the wind direction is biased along the axis of the valley floor. Wind behavior in the smaller valleys is complex, influenced by the prevailing direction, solar angle, and terrain features.

Overall, wind data suggest that wind flow in the South Coast region is generally northerly in the early morning and from the south to southwest in the afternoon. Further out in the channel, the winds are generally west to northwest.

During the fall and winter months, the area is subject to Santa Ana winds. Santa Ana winds are warm, dry, strong, and gusty winds that travel from the inland desert basins through the mountain valleys and out to sea.

Wind speeds average 14 to 17 miles per hour during the spring and summer and 10 to 14 mph during the autumn and winter. Wind speeds are not expected to exceed 86 miles per hour more than once in 50 years and 94 miles per hour more than once in 100 years.

Because there are few obstructions to the wind over the ocean, wind speed and direction offshore generally are dominated by overall weather circulation patterns. The offshore Channel Islands divert the wind flow locally, but, because they are aligned longitudinally with

the predominant winds, do not greatly influence winds onshore. Wind speeds tend to be higher in the western regions of the Santa Barbara Channel in the vicinity of Point Conception than they are in the eastern portions.

Diurnal variations in wind speed and direction occur as land temperatures vary from daytime to night compared to sea temperatures, which tend to vary little over short time spans. With cooling at night, airflows tend to move from land toward the ocean. As the sun heats the land in the morning, these flows gradually reverse until the dominant afternoon wind patterns tend to be from sea to land.

2.2.3.6 Physical Oceanography

The oceanographic environment of the area reflects conditions in the central part of the Santa Barbara Channel, a semi-restricted body of water influenced by major ocean circulation, wind patterns, and thermohaline regime affecting the California coast south of Point Conception. Bathymetric sills at either end of the channel control the vertical distribution of water properties in the channel. The sills together with passes between the Channel Islands affect the lateral motions within the channel. The Channel Islands and the configuration of the mountains along the mainland coast determine the pattern of winds, hence waves, within the channel.

The currents along the West Coast are dominated by the southward-flowing California Current, which is the eastern limb of the North Pacific gyre. The mean speed is about 0.2 to 0.5 knots, although speeds as high as 1.0 knots have been observed, primarily within eddies or meanders. The Southern California coastal region is also subject to surface and subsurface northward counter-currents and periods of intense upwelling.

The oceanographic conditions are divided into three dynamically different seasons: Oceanic (July-November), Davidson (December-February), and Upwelling (March-June). During the Oceanic season, southward flows associated with the California Current dominate. However, regions near the coast can experience northward flows which persist all year. In the Southern California Bight, this current is known as the Southern California Countercurrent. As the Davidson season develops, the northward coastal currents become more persistent all along the coast, and are known as the Davidson Current north of Point Conception. As the winds

over the coast strengthen and become steadier in the spring and summer, the Upwelling season begins. The northward coastal flow becomes less persistent, and less intense upwelling takes place along the coast.

The existing data suggest that the shelf and channel circulation in the Santa Barbara Channel are very complex and highly variable. The instantaneous flow offshore at most depths and at most times is to the west during strong flow, but more variable (to the east and west) during weaker flow. Currents associated with breaking waves in depths less than 10 feet are usually strongly directed to the east, opposite to the prevailing offshore flows. Surface flows are generally stronger than deep flow, and deeper currents are more variable and more often directed to the south of surface currents.

The wave climate of the Santa Barbara Channel is relatively mild when compared with that of the open ocean. The orientation and geography of the channel limit the entry of swell from outside the channel, except from the westerly and southeasterly directions. The most severe wave conditions in the channel occur during storm periods, when swells enter the channel at the same time that seas are being generated. Waves are usually less than 2 feet high and have periods of less than 9 seconds. Winter waves tend to be higher (6 feet or less) and have a higher proportion of periods exceeding eight seconds.

A tsunami is a system of very long gravity waves usually generated by submarine earthquakes. As a tsunami approaches coastal regions, significantly increased wave heights may result from wave refraction, shoaling, and local resonance. Calculated wave heights for proposed 100-year and 500-year tsunamis are about 6 feet and 12 feet, respectively.

The tide in the Santa Barbara Channel is a mixed semi-diurnal type with a range of about 6.7 feet. The time difference between high tides at the opposite ends of the channel is about 1 hour, with the eastern end leading the western end. Tidal-induced currents are weak in the open portions of the channel. The tidal currents vary depending upon water depths and shoreline configuration.

The nearshore FRP region includes the beach, surf zone (area of breaking waves), and the shallow waters where wave action moves bottom sediment. When waves approach the beach at an angle, quasi-steady longshore currents are generated in the surf zone. The currents increase in strength with increasing wave height and deviation of the incident waves approach angle from normal incidence to the beach. Longshore currents will most frequently flow from west to east and may exceed 3 knots.

Longshore transport of sediment is associated with the longshore currents. Sedimentary material is put into suspension by the water motions due to waves and is moved along shore in the steady currents. Sand is moved south from areas north of Point Conception towards Santa Barbara. Sediment is also supplied to beaches by river run-off and cliff erosion. Large transport rates are associated with large waves. Thus, there may be large amounts of sand transported along shore in some years and small amounts in others.

2.2.4 Physical Geography

The depth of the ocean in the Santa Clara River area is approximately 19.5 feet (NOAA Chart Point Dume to Purisima Point). There are no navigational hazards in the immediate offshore vicinity and the closest platform is Platform Gilda approximately due east of mouth in federal waters. Information on navigational hazards and shorelines (e.g., substrate type, sensitive resources, access) in the Santa Clara River mouth area is also provided in Sections 201 and 303 of the Clean Seas Regional Resource Manual.

2.2.5 Logistic Resources

Logistic resources within the geographic area are included in Appendix B: List of Contacts.

2.2.6 Shoreline Access

Coastal access is available at Ventura Harbor and Peninsula Beach north of the Santa Clara River estuary. Access from the south is available at Channel Islands Harbor. Clean Seas Yard and the Pier at Carpinteria are available as an equipment staging area and boat launch. Additional staging areas are available in the harbor areas for a coastal response.

SECTION THREE: PREVENTION MEASURES

3.1 RISK AND HAZARD THREAT ANALYSIS

3.1.1 Spill History

There have been no known reportable spills from the Sespe Pipeline that have reached the Pacific Ocean / beach area during the past twelve years.

3.1.2 Analysis Methodology

The "checklist / what if" analysis technique as outlined by the Integrity Management Plan for Hazardous Liquid Pipelines , 49 CFR 195.6, 450, 452(a), (b) & (f) was utilized for the conduct of the risk and hazard threat analysis. The pipeline was broken into six segments, then each segment was risk ranked and a complete threat analysis was completed for each segment.

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

The Risk and Hazard Threat Analysis is intended to address the pipeline, including block valves and pig receivers only and not the wells and processing facility. However, the pumps and tankage at Sespe were examined to the extent that they could impact the operation of the pipeline.

The risk and hazard threat analysis was conducted at Seneca's Bakersfield Office on

February 5, 2009. The analysis was reviewed and updated on May 24, 2013. A copy of the analysis is available in the Office. Information available and utilized during the conduct of the risk and hazard threat analysis included P&IDs and alignment drawings. All personnel participating in the risk and hazard threat analysis have ridden the pipeline route and examined the drawings.

3.1.3 Hazards or Threats Identified

Potential hazards or threats to the pipeline that could cause releases were identified during the conduct of the risk and hazard threat analysis. These causes are summarized below:

- corrosion (internal, external, stress)
- third party damage
- natural forces (seismic event, landslide/ground movement, flood, freezing, etc.)
- construction, manufacturing, or material failure
- operation (normal and incorrect)

- Health & Safety

- Environmental

- Property damage

- Alternative Modes of Operation

- Interactive

- Specific threats for the Segment

The most likely spill sizes from the potential hazards identified above were less than that determined in the worst-case scenario (see Section 4.1). It is noted here that it is impossible to completely eliminate the risk of a spill. The following section discusses the findings of the risk and hazard analysis for the potential hazards identified.

3.1.3.1 Corrosion

According to the California State Fire Marshal *Hazardous Liquid Pipeline Risk Assessment* (April 1993), external corrosion accounts for approximately 59 percent of pipeline releases and internal corrosion for approximately 3 percent. The database for this study included all regulated California hazardous liquid pipelines including some without cathodic protection. The study found that unprotected pipelines had an external corrosion leak incident rate over five times higher than protected lines.

The Sespe Pipeline is coated below ground and equipped with cathodic protection. The temperature range of the crude oil sent through the line is at ambient temperature and thus heat does not present a problem to the coating. Seneca monitors the cathodic protection system in accordance with all applicable regulations.

The crude transported through the pipeline is not corrosive and thus no internal corrosion problems are expected, nor have they occurred in the past. In addition to the cathodic protection on the pipeline, the risk of a release due to corrosion is partially mitigated by performing ultrasonic and hydrostatic tests on the pipeline. The hydrostatic test is a preventive measure with respect to a release, since potentially weak pipe sections may be disclosed while testing the pipe above normal operating pressure with water. The pipeline will be hydrostatically tested every five years in accordance with regulations. The next test is due in 2015. The exposed piping below Station 202 + 00 will be ultrasonically tested for thickness semi-annually.

The risk and hazard analysis concluded that this potential risk is adequately mitigated.

3.1.3.2 Third Party Damage

According to the State Fire Marshal's report, approximately 20 percent of pipeline incidents are caused by third party damage. Seneca mitigates these type accidents by patrolling the pipeline at least weekly by aircraft, weekly by car or truck, and quarterly by foot. Seneca also belongs to Underground Service Alert (USA) and has provided USA

with the location of the pipeline.

The risk and hazard analysis concluded that this potential risk is mitigated to the maximum extent feasible, but also recognizes that it is still possible for a third party to damage the pipeline.

3.1.3.3 Seismic Event

The State Fire Marshal's report states that only three of the roughly 500 leak incidents on California's regulated hazardous pipelines were judged to be caused directly by earthquake effects. This is approximately 0.6 percent. Seneca has a policy of shutting down pipelines near a major earthquake. Before restarting the lines, the facilities and exposed pipelines are inspected for damage. The Sespe Pipeline was not damaged by the 1994 Northridge Earthquake, although Fillmore sustained significant damage.

The study concluded that Seneca's policy of shutting in pipelines in the event of a major earthquake adequately mitigates this event; however, it recognizes that a pipeline could be damaged with a resulting leak.

3.1.3.4 Landslide/Ground Movement

The State Fire Marshal's report did not identify incidents caused by landslide or ground movement except those associated with an earthquake. Thus, it is assumed that this potential cause is remote. Seneca inspects pipeline free suspensions, bridges, and hangers on a monthly basis. No areas of the pipeline were identified that present a significant threat to the structural integrity of the pipeline system.

3.1.3.5 Material Failure

The State Fire Marshal's report concluded that 9 percent of pipeline incidents are caused by weld failures or equipment malfunction. The Sespe Pipeline is hydrostatically tested every five years. The risk and hazard analysis also reviewed the preventive maintenance program and determined that it, in conjunction with ongoing hydrostatic tests, adequately addresses component inspection and testing.

3.1.3.6 Operation

The State Fire Marshal's report concluded that 1.6 percent of pipeline incidents are caused by operator error. The operation of the Sespe Pipeline is essentially an automatic operation requiring little or no operator intervention. Pumps at the Sespe facility pump oil through the line automatically based on level switches in the swing tank. Seneca has written procedures describing normal operations, including startup without pig, startup with pig, startup after hydro test, and shutdown and abnormal operations including unintended valve closure or shutdown, increase or decrease of pressure or flow rate, and operation of safety valves.

One potential hazard has been identified that could increase the amount of oil released in the event of a leak downstream of the pipeline laterals. (b) (7)(F), (b) (3) that can be closed by Seneca personnel to prevent oil from discharging into the Sespe Pipeline in the event of a leak in the Sespe Pipeline, immediate shutoff of the oil at the source could result in less oil being released (see Section 3.1.4).

3.1.4 Mitigation Plan

The risk and hazard analysis recommends that Seneca implement procedures to notify the operators of the laterals in the event of a leak or potential leak in the Sespe Pipeline. This notification will request that the operator immediately cease sending crude oil to the Sespe Pipeline. These notification procedures are included in Seneca's OSPR, Facility Response Plan (Section Seven).

3.1.5 Remaining Risk

Although it is felt that the potential for a leak or rupture has been mitigated to the maximum extent feasible, a small potential for a release exists. Section 3.1.3 discusses the potential causes of pipeline spills in general and the measures employed by Seneca to mitigate potential spills. The greatest remaining risk to the Sespe Pipeline is from third party damage. Seneca belongs to Underground Service Alert and patrols the pipeline route on a frequent basis; however, it is still possible that a third party could damage the pipeline, resulting in a leak.

3.1.6 Documentation

The documentation and materials (P&IDs, diagrams, etc.) used in the risk and hazard analysis are maintained at Seneca's Bakersfield office. The point of contact and mailing address are:

Keith Jones
Sr. Technical Advisor
2131 Mars Court
Bakersfield, CA 93308
(661) 399-4270

3.2 OFFSITE CONSEQUENCE ANALYSIS

3.2.1 Trajectory Analysis

(b) (7)(F), (b) (3). This spill results from three hours of pumping (see Section 4.1). The trajectory of the spill would be a function of the location of the spill and the amount of oil that is released. The line parallels Sespe creek for about five miles while it traverses Goodenough Road. It is possible that a release along this segment could reach the Sespe Creek that flows to the Santa Clara River. A release in the City of Fillmore could enter storm drains that empty into the Santa Clara River.

The actual trajectory of the oil once it reaches Sespe Creek or the Santa Clara River would be a function of the amount of oil released and how much water is flowing in the creek/river. If the creek and river were dry, the oil would not be expected to reach the ocean. If they are flowing heavily, there is a probability of oil reaching the ocean.

The Clean Seas Regional Resource Manual presents a trajectory analysis for a (b) (7)(F), (b) (3) spill from the Mandalay area. This area is just south of the mouth of the Santa Clara River. This trajectory has been assumed to be representative of the worst-case spill from the Sespe Pipeline, assuming the oil reaches the mouth of the Santa Clara River and ultimately the ocean.

The following is a brief discussion of this trajectory analysis:

An envelope of possible spill trajectories was calculated for shoreline facilities in the Mandalay area, just south of Ventura. The trajectory analysis considered oil transport by the wind and tidal currents, and spreading of the oil by physical processes such as gravity, surface tension, and tidal dispersion. Immediately after release of the oil, spreading of the spill would occur primarily from physical spreading processes. Within

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

nautical mile in diameter. By three days, the spill patch would be approximately 3 nautical miles in diameter.

Transport of the spill away from the source would be due primarily to longshore coastal currents and wind-induced surface drift. The direction and strength of this transport varies seasonally and with the direction, strength, and persistence of local winds. Westward transport, which would be expected when the westward flowing coastal current is strongest (spring and summer) and/or when the winds are from the east and southeast, could move the spill to Santa Barbara after one day, and to Point Conception after three days. During periods when the westward coastal current is weak (fall and winter) and when westerly winds are present, the spill would move eastward along the coast, reaching within 10 nautical miles of Point Dume after one day and within 10 nautical miles of Santa Monica after three days. Santa Ana wind conditions combined with weak coastal currents would cause spill transport to the south, across the Santa Barbara Channel. Within three days, the spill could move across the channel to the islands of San Miguel, Santa Rosa, Santa Cruz, and Anacapa.

These spill trajectory envelopes represent the outer perimeter of shore-side areas that could receive oil in the event of any spill. The envelopes are based on regional extremes of climate, tide, current, and wind and assume pessimistic dispersion and other adverse weather conditions. These trajectory envelopes *do not* represent the trajectory of any one spill. A full discussion of the details used for preparing these spill envelopes is provided in Section 202.2 of the Clean Seas Regional Resource Manual.

3.2.2 General Toxicity Effects and Persistence

3.2.2.1 Toxicity

In general, oil can be toxic to biological resources. Oil contamination of intertidal areas, waterfowl, and furbearing mammals can be severe.

The following summarizes the potential toxicity from the oil to biological resources as taken from the Clean Seas Regional Resource Manual:

- **Wildlife** - Wildlife are susceptible to significant injury and mortality from contact with oil spills. In general, the degree of sensitivity to oil spills is based on habitat location and behavioral characteristics. For example, most waterfowl and shorebirds, particularly diving birds, are very sensitive to oil spills due to their

extensive use of the water, whereas terrestrial birds may nest near the water but have a low sensitivity to oil spills if they do not frequent shoreline areas. Similarly, animals that frequent coastal areas may be impacted by oil spills if they feed on vegetation or dead animals along the shoreline that could become oiled. Wildlife impacts may result from the physical effects of the oil on their fur or feathers or through ingestion during preening or scavenging. Selected marine mammals (e.g., sea otters and fur seals) and birds (primarily waterfowl) rely on their fur or feathers for insulation and buoyancy, which can be adversely affected if they become oiled. Significantly oiled sea otters, fur seals, or birds can perish from hypothermia and exhaustion or may become sick from ingestion of the oil while preening. The effects of ingestion vary depending on the toxicity of the oil. In general, the lighter the crude oil or petroleum product, the more toxic it is to wildlife.

- **Finfish and Shellfish** - The sensitivity of various fish species to oil spills typically depends on their growth stage (juveniles are generally much more sensitive than adults), their feeding or migration habits, and the type of oil. Species that frequent shallow or near-surface areas will often be exposed to higher concentrations of dissolved hydrocarbons than those that reside primarily in deeper waters. Lighter crude oils and refined petroleum products have a greater impact on fish than heavier oils due to their generally greater solubility and higher concentrations of toxic components.
- **Kelp and Eelgrass Beds** - Kelp and eelgrass beds are valuable habitats for numerous finfish and shellfish. Eelgrass is much less abundant than kelp, but is used as spawning grounds for some fish and as an important sanctuary for a number of planktonic organisms. Eelgrass is very susceptible to the toxic and physical effects of oil spills. Kelp beds also serve as habitats and sanctuaries for a number of finfish, shellfish, and other marine organisms, but are less susceptible to the effects of oil spills. Kelp fronds and blades are covered with a mucous that inhibits the oil from sticking although a kelp forest canopy can trap substantial quantities of oil, resulting in the mortality of many of the organisms inhabiting the canopy. The effect of the oil is generally short-term due to kelp's rapid growth rate.

3.2.2.2 Persistence

In general, the longer the oil is expected to persist on a shoreline, the higher the priority for protection. Long-term oil persistence can present chronic toxicity effects as well as affecting the natural sediment erosional and depositional processes.

The potential persistence time of stranded oil on a shoreline is primarily dependent on the following:

- Degree of impact.
- Type of shoreline sediments.
- Level of exposure to the elements.

In general, higher degrees of impact, coarser, well-sorted sediments, and lower levels of exposure to wind, waves, currents, and tidal flushing will increase the residence time of the oil on the shoreline. Coarser grain sediments usually permit the oil to penetrate deeper into the shoreline but can also allow for greater tidal flushing and natural degradation. Finer grained sediments typically inhibit penetration but if oil does become incorporated into the sediments, residence time will increase.

Lower levels of exposure, such as in protected inlets of bays, will increase the residence time due to the decreased natural abrasion caused by sediment movements and flushing action by wind, waves, and tides. Protected areas may also be shaded and calm, which could inhibit evaporation and photo-oxidation. General guidelines on the potential persistence of oil on a variety of shoreline types are provided in Table 303-1 of the Clean Seas Regional Resource Manual.

3.2.2.3 Seasonal Effects

The primarily seasonal effect on biological resources is whether the specific resource is present at the time of the spill. This is especially true of birds and mammals. Plants may be affected differently depending on the timing of the spill relative to the plant's growing season. In general, oiling during the dormant winter season has the lowest impact, whereas oiling of vegetation during the summer growing season has longer effects.

3.3 RESOURCES AT RISK

Onshore environmental, cultural, and economic resources at risk from a spill at the facility will be determined using the LA/LB ACP4-North; 9813 Ventura County Area Contingency

Plan (ACP), any recent Biological Assessments / Biological Evaluations (BA/BE) and Cultural Assessments completed in the Sespe Oil Field for Seneca Resources plus other resources available at the time including the experience of the Responders.

Offshore resources at risk from a spill at the facility are identified and mapped in the Clean Seas Regional Resource Manual (Section 303). The resources identified include environmentally, economically, and culturally sensitive areas. In addition, the maps identify three levels of prioritization.

3.4 REQUIRED PREVENTION MEASURES

3.4.1 Overview

Seneca has instituted a number of oil spill prevention measures to reduce or mitigate potential spills from the Sespe Pipeline. Numerous safeguards, both internal and regulated, have been designed to improve spill prevention as discussed below.

The risk and hazards analysis concluded that the facility is equipped with adequate alarms to maintain flow (see Section 3.1.3). However, the analysis revealed additional measures necessary to reduce the volume of spill:

- The pipeline is equipped with scraper launchers and receivers for line cleaning operations.
- Pigging operations are conducted at least every four months or sooner to keep paraffin wax from building up. The pig receiver is located inside a fenced area by the LACT Unit at Fillmore.
- There are no open-ended valves.
- In the event of extremely high liquid level in the swing tanks, a warning light is lit and the pump continues to operate. For very low liquid level in the tanks or low suction pressure, the pump is shut off automatically. When the incoming liquid causes the level to rise, the pump is re-started by an operator.
- Drawings of the pipeline system are kept up-to-date at all times to reflect additions, deletions, and changes in the pipeline system. Additionally, an operating history of the pipeline is developed and kept at all times in Seneca's office in Bakersfield, CA.
- The transfer-shipping pump is capable of 1000 psi discharge pressure; however,

the (b) (7)(F), (b) (3) the event of an unintended valve closure at the tie-in to the Crimson pipeline.

- Pipeline integrity is evaluated by hydro-testing. The Sespe Pipeline and all laterals are hydro-tested every 5 years. Written reports are prepared and retained summarizing the test results. Leaks or other defects are repaired immediately.
- Pump packing and seals are inspected for excessive leakage of oil that may become a source of fire or explosion. Faulty packing and seals are replaced immediately.
- All pump connections, both flanged and screwed, are inspected for tightness and leakage to remove possible hazardous conditions. Bolted connections on the pump itself and mating surfaces are inspected for tightness and leakage, and defects repaired.
- The pipeline operating pressure at the Sespe pump is constantly recorded by a 24-hour recording pressure gauge that is monitored during startup until steady state pressure and flow conditions are reached.
- The pipeline is constructed in accordance with API Bulletin 1105, entitled "Construction Practices for Oil and Products Pipelines."
- Full line size of block valves are installed in the pipeline at selected intervals to isolate sections in case of emergency.
- All welded joints are made by welders certified per API Specification 1104, entitled "Standard for Welding Pipelines and Related Facilities."
- Seneca personnel are on duty 8-hours per day making early detection of a significant leak probable.
- Seneca instructs all personnel assigned to work on the lease on how to prevent oil discharges.
- Personnel receive training in spill prevention, spill response, and all applicable pollution control laws and regulations (Refer to Section Ten of this plan).

3.4.2 Scheduled Methods and Procedures for Testing, Maintenance and Inspection

- Operating personnel visually inspect tanks, pipelines, including associated pumps, valves, flanges daily, spill prevention equipment quarterly, and replace or repair equipment as necessary.
- The pipeline is patrolled weekly by aircraft, and car or truck; and annually by foot.

- The Sespe Pipeline is coated below ground and equipped with cathodic protection.
- All major equipment undergoes regularly scheduled maintenance. Equipment that is worn or in need of repair is scheduled for repair as soon as possible. The frequency of repair of all major equipment is reviewed periodically; and equipment is replaced when the frequency is unreasonably elevated.
- Maintenance and inspection records are maintained in a file in the office for a period of three years.

3.4.3 Methods to Reduce Spills during Transfer and Storage

The Sespe Pipeline relies on automatic and local control devices to maintain transfer operations. This section does not apply to this facility. It is not a terminal, exploration or production facility.

3.4.4 Clear Communication during Transfer Operations

This section does not apply to this facility.

3.4.5 Protection Measures during Flooding

No areas were subject to flooding during the extreme rains of 1995. Therefore, no protection measures are deemed necessary.

3.4.6 Identified Mitigation from Risk and Hazard Analysis

The risk and hazard analysis recommended that Seneca implement procedures to notify its operators of the laterals in the event of a leak or potential leak. Notification of lateral operators is included in the notification procedures, section seven.

3.4.7 Additional Prevention Measures

None are contemplated or deemed necessary.

3.5 OTHER PREVENTION MEASURES

3.5.1 Regulatory Measures

- All Swing tank areas are bermed such that they have sufficient capacity to contain

the volume of the largest tank, plus precipitation.

- Tanks, pipelines, and containment devices are visually inspected daily and repaired as necessary.
- There are high and low level indicators on the Swing tanks.
- The pipeline is constructed in accordance with API Bulletin 1105.
- Pipeline integrity is ensured by hydro-testing every five years.
- All welded joints are made by welders certified per API Bulletin 1104.
- Personnel receive training in spill prevention and all applicable pollution and control laws and regulations.

3.5.2 Risk Reduction Incentive Programs

There is no risk reduction incentive program at this facility.

3.5.3 Leak Detection and Spill Prevention Safety and Alarm Systems, Devices, Equipment or Procedures

- Established leak detection systems including detection threshold do not apply at this facility.
- The Sespe Pipeline relies on automatic and local control devices to maintain transfer operations. Upset conditions are handled with automatic shutdown of the shipping pump at the Sespe swing tanks. Leak detection is accomplished by surveillance.
- Visual signs of abnormal operations (high and low pressure) include the activation of a red warning light on a pole at the swing tank. Field personnel investigate and take correction action.
- Discharge valves and packing are located at shipping pumps so that even minor leaks are noticeable by the field operator. In addition, regular leakage inspections are performed. Drip pans (when necessary) are inspected after each shipment and are drained as required. Absorbent material is available at these locations.
- In the event of a leak, required procedures include: shut off the source, notify lateral operators, contain the flow, clean up the spilled material, dispose of waste in accordance with regulatory requirements, and repair the equipment.
- No criteria are applicable for suspension of operations while leak detection or other spill control systems are inoperative for this production facility.

3.5.4 Automatic Controls For Normal Processes, Safety Shutdown And Emergency Shutdown

- Emergency procedures are prioritized for the Sespe Pipeline and are discussed in Section Six of this plan.
- Emergency shutdown of the facility is accomplished automatically.

3.5.5 Employee Anti-Drug Testing Plan

Seneca by virtue of its daily operation with respect to the transporting, storing and handling of petroleum products recognizes its responsibility to seek all measures considered necessary to ensure the safe and efficient operation of its facilities. This responsibility, in an industry that demands comprehensive safety measures, extends not only to the protection of the well-being of their employees and facilities, but the community and general public as well. Seneca's commitment to the protection of their employees, operations and the public is evidenced by the implementation of programs and procedures that ensure compliance with appropriate safety measures and all applicable laws and regulations, including the Drug-Free Workplace Act of 1988.

As a matter of law and general industrial practice, Seneca has the responsibility to implement reasonable work rules governing the conduct of employees on Seneca property or off Seneca property while engaged in Seneca business. Because of the growing concerns of alcohol and drugs in the workplace, and their potential impact with respect to the safe and efficient operation of its facilities, Seneca has implemented an Anti-Drug Testing Plan. This plan is on file at the Bakersfield Office.

3.5.6 Additional Prevention Measures

Additional prevention measures include:

- The Sespe Pipeline is coated below ground and equipped with cathodic protection. The temperature range of the crude oil sent through the line is at ambient temperature and thus heat does not present a problem to the coating.
- The lower reach of the Sespe Pipeline from Sta 0+00 (Crimson connection) to Sta 252 + 58.87 (Bonebrake "A") is under external cathodic protection by a rectifier. A common connecting wire between the crude oil and gas pipelines is located at 201+60

(North of Little Sespe Creek). The gas line is connected to Seneca's rectifier located at Sycamore Road. For added protection, an additional rectifier is installed for the upper reach of the pipeline from Sta 252+58.87 to Sta 433+02.52 (Swing Tanks Terminal). Readings for these rectifiers are taken and recorded bi-monthly.

- The pipeline is buried with 30 inches of cover and coated with Pacific Coast No. 2 Somastic coating of standard thickness of 4.5-inch pipe.
- Seneca monitors the cathodic protection system in accordance with all applicable regulations. The entire system is inspected by a corrosion engineer annually.
- The pipeline is patrolled and inspected for leaks via aircraft, car or truck, and on foot. (See Section 3.5.7).
- Pipeline free suspensions are inspected for safety and adequacy.
- Pipeline bridges and hangers are inspected for any signs of wear or deterioration and defects repaired immediately.
- Protective coating is inspected where visible. Defects found are repaired as soon as practicable.
- Any safety-related condition that cannot be corrected within five working days of detection is reported to the California State Fire Marshall and the PHMSA.
- Seneca management or engineering personnel periodically review the work done by operator personnel to determine the effectiveness of the procedures used in normal operations and maintenance, and take corrective actions where deficiencies are found.
- Seneca belongs to Underground Service Alert (USA) and has provided USA with the location of the pipeline.

3.5.7 Security and Surveillance Measures

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



3.5.8 Training

Refer to Section 10.1 and 10.2 in this document.

SECTION FOUR: ON-WATER CONTAINMENT & RECOVERY

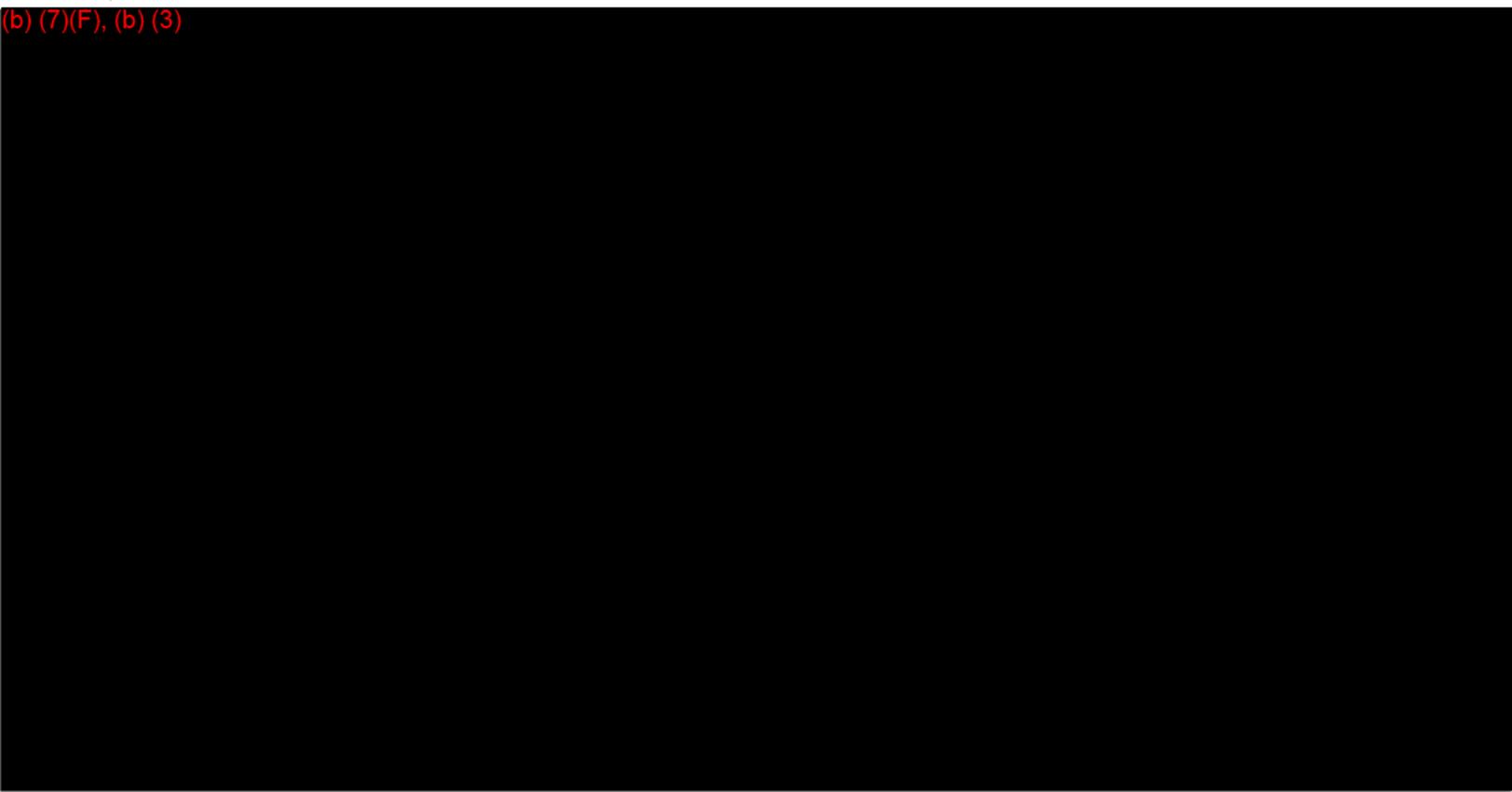
4.1 REASONABLE WORST CASE SPILL

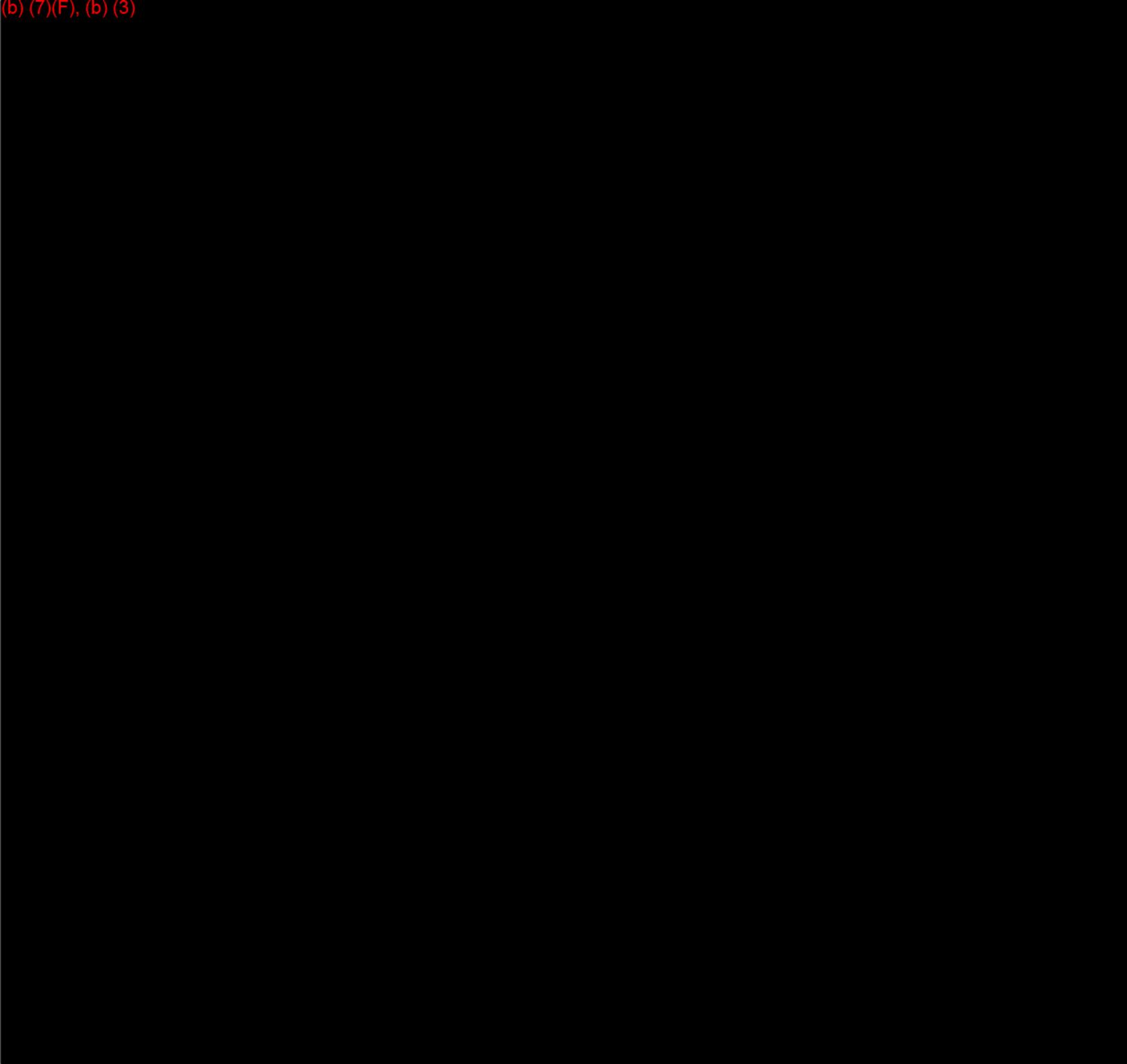
Seneca will provide for the on-water containment and recovery of all potential spills from the pipeline. To determine the amount of containment and recovery capability that must be available, Seneca must calculate a Response Planning Volume. To calculate this volume, it is first necessary to determine the reasonable worst-case spill for the line. Calculations of the reasonable worst-case spill for the Sespe Pipeline must take into consideration:

- That portion of the total line fill capacity which could be lost during a spill, taking into account the availability and location of the emergency shut-off controls; plus
- The amount of additional spillage that could reasonably be expected to enter California marine waters during emergency shut-off, transfer or pumping operations if a hose or pipeline ruptures or becomes disconnected, or if some other incident occurs which could cause or increase the size of an oil spill. The calculation may take into consideration other safety devices, emergency reaction times and maximum transfer rates.

Basis for the reasonable worst-case discharge for the Sespe Pipeline assumes the following:

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





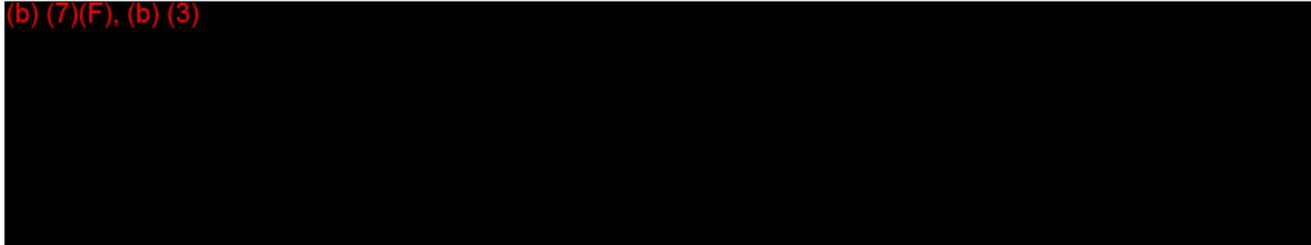
4.3 OSPR RESPONSE PLANNING VOLUME

The OSPR Response Planning Volume is (b) (7) (F) (b). (Note: The Planning Volume calculated pursuant to 33 CFR Part 154, Appendix C, Section 7 is not applicable to the Sespe Pipeline.)

4.4 RESPONSE CAPABILITY STANDARDS

According to the regulations, the total amount of on-water containment and recovery equipment and services required shall be the lesser of the amount necessary to address the response planning volume determined in Section 817.02(d)(2)(C) or the Daily Recovery Rate established by 817.02 (d)(3)(B). For the Santa Barbara Channel Area risk

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



On-water spill containment is primarily conducted through the use of oil spill containment booms and damming techniques. Skimmers are the most effective means of recovery; although pumps, vacuum systems, and sorbents can be effective. Containment at or near the source is also often associated with thicker layers of oil within the containment booms which, in turn, increases the efficiency of most skimmers. Away from the source, the oil may spread to very thin layers or a sheen, making recovery difficult.

Seneca's Initial Response Team (IRT) is prepared to contain and recover minor spills and take immediate actions to control larger spills to land. The IRT is capable of deploying onsite containment equipment to prevent a spill from spreading and to herd the oil toward a collection point. Initial response containment equipment for the Sespe Pipeline is stationed at the Sespe Office, Patriot's Santa Clarita & Ventura Yards, and Double Barrel's Riverside Yard. Response time for deploying the onsite equipment is immediate upon initial detection of a spill. Additional assistance is also available from local contractors.

In the event a spill is likely to discharge to or threaten marine waters, Seneca would rely on the expertise of Clean Seas' personnel and their response vessels and equipment. Clean Seas' response time is approximately 2 hours, depending on the equipment required for spill response and the timing of the incident.

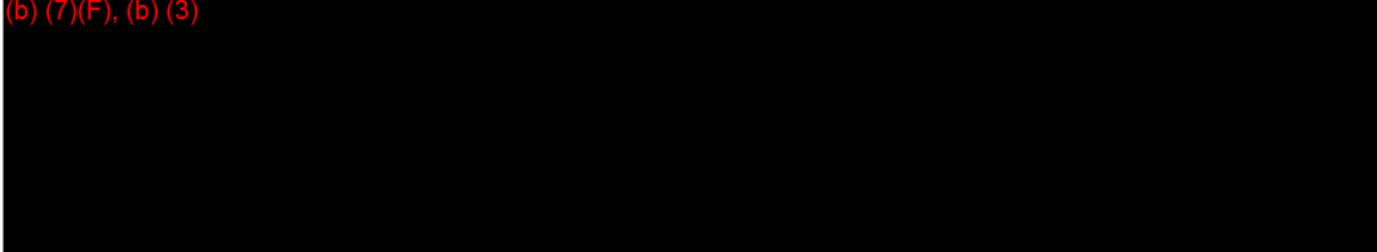
All on-water containment and skimming activities would be initiated by Clean Seas. Response resources for a worst-case discharge to meet the OSPR planning volumes and response times are provided in Table 4-1.

4.5 NON-CASCADABLE EQUIPMENT FOR ON-WATER RECOVERY

The amount of equipment that is non-cascadable outside of the Santa Barbara Channel is determined as follows for the Sespe Pipeline:

- The total amount required will be the lesser of the amount necessary to address the Response Planning Volume, or the amount specified in Table 4-2.

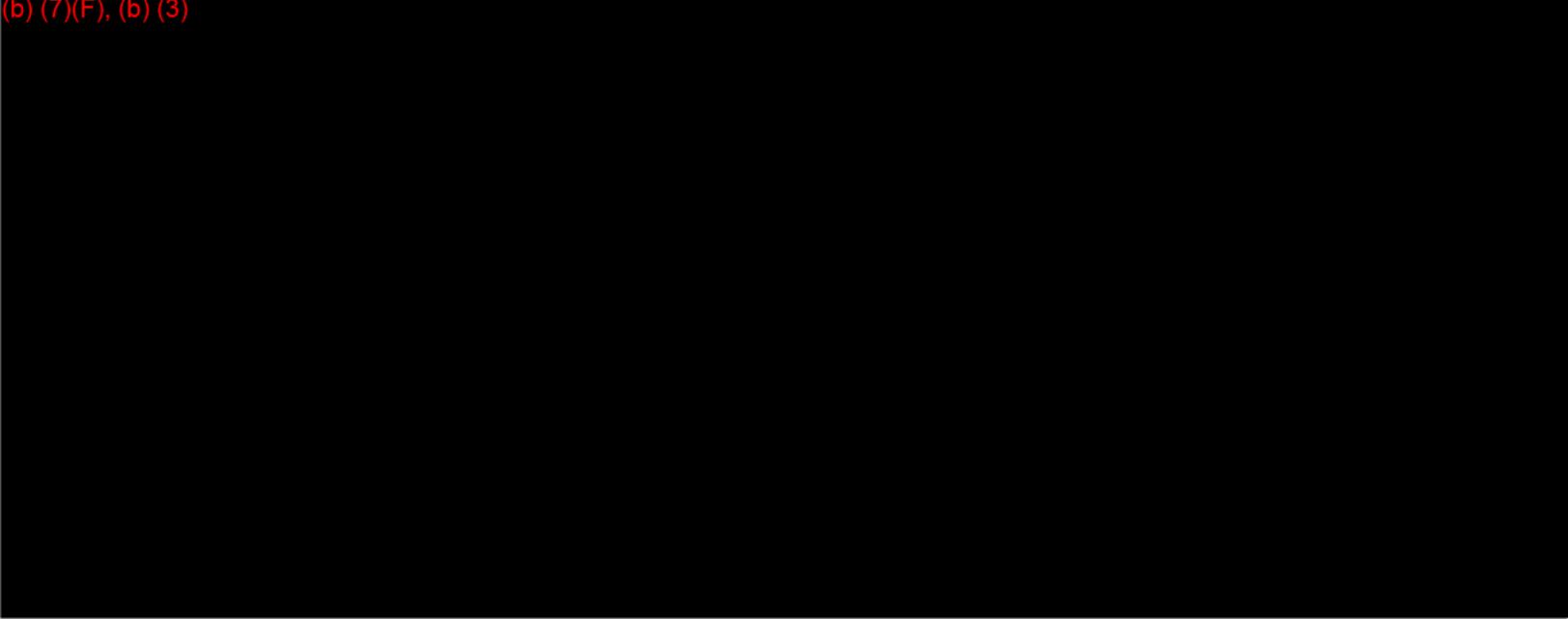
(b) (7)(F), (b) (3)



All Seneca onsite response equipment is deemed non-cascadable. Seneca shall nominate, as required by Section 817.02 (d) (4), the Clean Seas' Oil Spill Response Vessel (OSRV) stationed at Point Arguello as non-cascadable. (Note: All Clean Seas' OSRVs, SRVs, and the CS1 skimmer (over 40,000 B/D de-rated capability) can be on scene anywhere in State waters in the Area of Interest within 12 hours.)

TABLE 4-1: RESPONSE RESOURCES FOR WORST-CASE DISCHARGE

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



4.6 ON-WATER RESPONSE EQUIPMENT AND SERVICES

4.6.1 Response Contractors

Seneca has entered into a contract with one approved contractor, Clean Seas, using the contractor's application to meet any or all of the on-water containment and recovery response element requirements of this plan. All equipment identified in this response plan is appropriate for use in the Santa Barbara Channel Area risk zone for use on Group 3 medium crude. Clean Seas can be onsite to respond to a spill within approximately 2 hours. The equipment available to Clean Seas is presented in Section 501 of Clean Seas Regional Resource Manual. Clean Seas can provide the required response capacities to meet all the minimum standards for all member facilities during the first 60 hours of a required response.

4.6.2 Vessels Of Opportunity

The resources identified in this contingency plan meet the required planning levels for response operations. Seneca does not incorporate the use of vessels of opportunity due to the minimal response planning volume of (b) (7) and the adequate complement of response equipment available to contain and recover the reasonable worst-case discharge.

4.6.3 Pumping And Transfer Equipment

To transfer spilled oil or address oil at risk of discharging, Seneca would use the following:

- Contract vacuum truck service (from Fillmore).
- Clean Seas.
- Outside resources (see Appendix B, List of Contacts)

4.6.4 Seneca Response Equipment Storage, Maintenance, Inspection, And Testing

Seneca maintains no on-water containment and recovery response equipment for the Sespe Pipeline. Seneca will rely on the equipment resources of Clean Seas for on-water response. Storage, maintenance, inspection, and testing of Clean Seas equipment is discussed in the Clean Seas response plan in accordance with Subsection 817.02 (d) (5) (B) (9).

4.6.5 Oil Movement And Tracking

Seneca would use the following equipment and resources for tracking oil spill movement:

- Visual observations by aircraft and vessels.
- Clean Seas contract aircraft, spill tracking systems, and Radiometric Oil Spill Surveillance System (ROSSS).

ROSSS is mounted on a twin-engine, fixed-wing aircraft based in Van Nuys, CA, under contract to the West Coast cooperatives to provide almost real-time tracking of oil. On call 24 hours a day, ROSSS can be operated at night, during foggy or cloudy conditions, and at various altitudes to provide enhanced imagery of the location and relative thickness of oil on water. The ROSSS can cover up to a 1-mile ground swath depending on altitude, and can be employed at varying altitudes up to 12,000 feet during operation. Use of the system is expected to allow for around-the-clock, at-sea removal operations, thus increasing the de-rated capability of current equipment.

Refer to Clean Seas Regional Resource Manual (Section 502) for additional information on oil spill tracking.

4.6.6 Oil Spill Response Personnel

The personnel available to respond to an oil spill include:

- Seneca and available OSRO (Patriot, or Double Barrel) personnel comprising the IRT and SMT (see Section 6.1 of this plan).
- Clean Seas personnel defined in the Clean Seas Regional Resource Manual (Section 502).

Contract response personnel and response times are shown in Table 4-3. Each Contractor is responsible for determining their own job categories, including job descriptions, duties and training for response operations as defined in their respective approved response plans or Letter of Approval.

With respect to Seneca response personnel, a list of response positions including job category and description are fully described in Sections 6.1 and Appendix E of this plan. Mobilization of personnel would be accomplished verbally either by telephone, or word-of-mouth. Personnel would be mobilized to the spill site by vehicles. Seneca's' initial onsite response techniques are built upon the efficient and prompt mobilization of personnel immediately available onsite and by Clean Seas for spills which reach marine waters.

Seneca would provide sufficient personnel to maintain a response effort of at least 14 days by utilizing resources from a combination of the following sources:

- Seneca Resources Corporation
- Clean Seas
- Patriot or Double Barrel

TABLE 4-3: CONTRACT PERSONNEL RESPONSE TIME

COMPANY	MOBILIZATION POINT	HAZWOPPER TRAINING (6 hours)	MOBILIZATION TIME	
			6 hours	24 hours
Clean Seas	Carpinteria, CA	Refer to Clean Seas Regional Resource Manual		
Patriot	Ventura, CA	1,000		
- Supervisor			15	29
- Coordinator			28	56
- Medic			11	11
- Health & Safety			9	17
- Laborer			300	758
- Equipment Operator			50	212
Note: Patriot from Santa Clarita or Bakersfield and Double Barrel from Riverside or Bakersfield have similar response times and personnel.				

Seneca spill management personnel, including their qualifications, training, experience, and management responsibilities are fully described in Sections 6.1, and 10.0, and Appendix E. All spill response personnel receive classroom instruction, field briefings, and exercises and drills specific to their job duties and responsibilities.

4.6.7 Transportation Of Equipment, Personnel, And Other Resources To The Spill Site

The procedures for transporting Seneca personnel to the spill site are described in Section 4.6.6. Equipment is stored onsite and would be transported by truck to the spill site. Adverse environmental conditions (i.e., weather, sea state, tides, wind, currents) should seldom affect response operations in the event the spill reaches marine waters.

The climate is typified by mild, wet winters, and warm dry summers. Winds are normally light to moderate. For spills to marine waters, the currents along the West Coast are dominated by the southward flowing California Current with a mean speed of about 0.2 to 0.5 knots. Waves are usually less than 2 feet high and have periods of less than 9

seconds. Winter waves tend to be 6 feet or less. (For additional information regarding environmental conditions, see Section 2.2 of this plan). Seneca's contractors have selected equipment that operates in the Santa Barbara Channel under most ambient conditions. In the event that environmental factors are adverse during an oil spill, the deployment and transport of spill response equipment could be restricted, particularly during high wind and wave conditions. Spill boom is ineffective during these conditions and would not be deployed. The spill would be tracked visually and by other methods including ROSSS until such time that it is safe and effective to deploy boom.

4.7 ON-WATER RESPONSE AND RECOVERY STRATEGIES

4.7.1 Open-Water And Close-To-Shore Environments

The feasibility of effectively implementing containment and recovery techniques is generally dependent on the size of the spill, available logistical resources, implementation time, and environmental conditions in the spill area. Seneca's strategy is to use contractor equipment and expertise to contain and recover spilled oil to the marine environment. The Clean Seas Regional Resource Manual (Section 302 and Appendix A) provides a general containment and recovery operation implementation guide, including primary strategy considerations and oil recovery techniques.

4.7.2 Non-Mechanical Methods Of Response

Due to the environmental sensitivity of the local marine environs, Seneca does not anticipate using dispersants. Section 307.1 of the Clean Seas Regional Resource Manual provides a discussion on dispersants and their use. Other non-mechanical methods of response are discussed in Sections 307.2 and 307.3 of the Clean Seas Manual.

4.7.3 Methods For Tracking The Movement Of Discharged Oil

Section 4.6.5 describes the equipment resources for tracking the movement of discharged oil. Seneca would rely on Clean Seas' spill tracking methods and expertise.

4.8 LOCAL WEATHER SERVICE

The National Weather Service (NWS), which is a line office within the National Oceanic and Atmospheric Administration (NOAA), is responsible for providing up-to-date weather information in response to oil spills. NWS can provide such information as wind direction and speed, air and sea temperatures, and direction and height of sea and swell. The NWS can also provide weather forecasts, which are updated daily, and can extend anywhere from two-to-five days.

In a spill response, weather information will be provided to the Federal OSC by the NWS via the NOAA Scientific Support Coordinator (SSC). An agreement between NOAA's Hazardous Materials Response and Assessment Division and NWS establishes the SSC as the point of contact in order to streamline the flow of information and to provide specialized weather needs without affecting the normal operating procedures of the forecast office. Furthermore, this agreement provides for a dedicated meteorologist to assist NOAA in obtaining the most accurate and current information for operational planning and trajectory analysis.

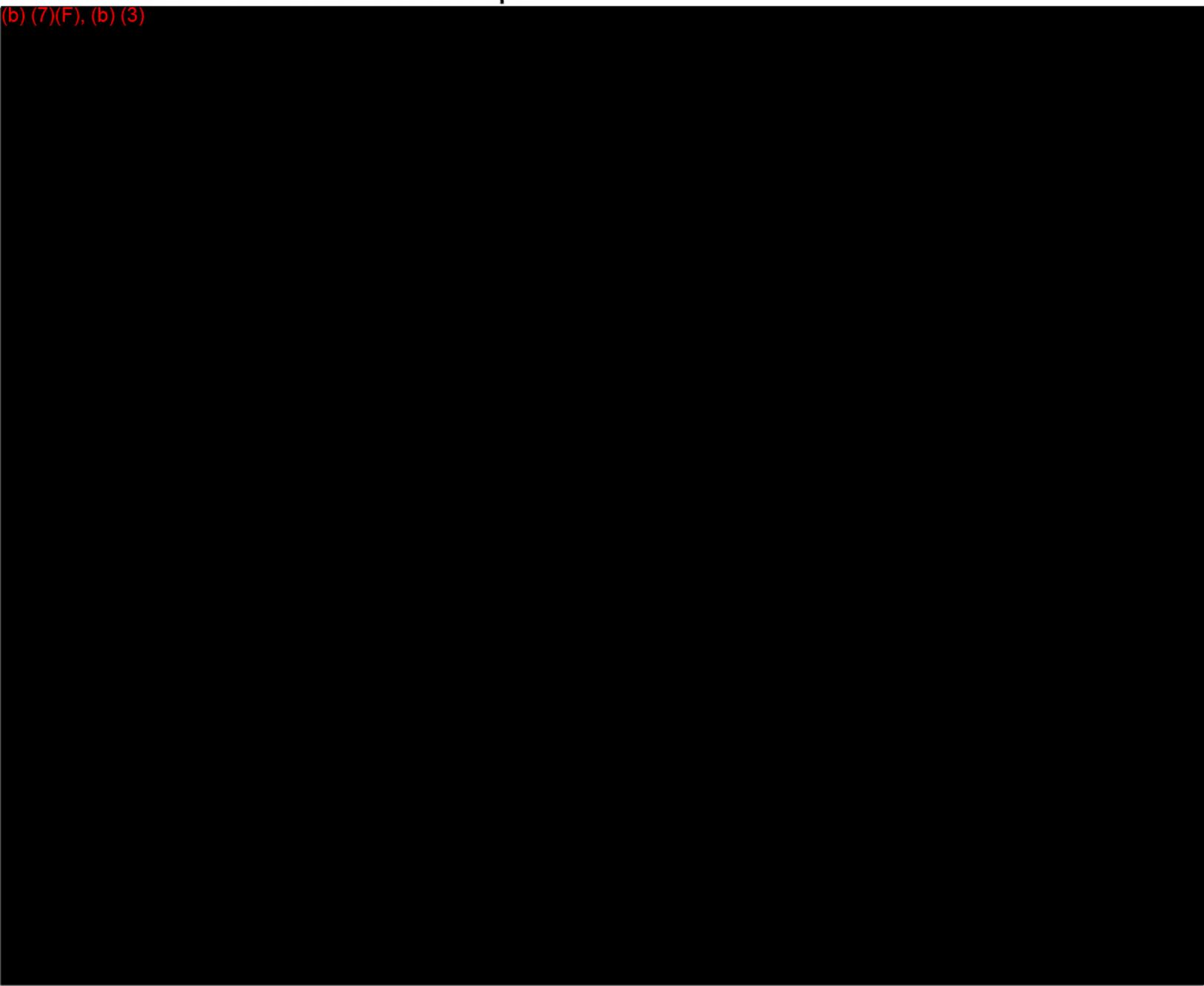
SECTION FIVE: SHORELINE PROTECTION AND CLEANUP

5.1 RESPONSE PLANNING VOLUME

Seneca will provide shoreline protection and cleanup for all spills resulting from the Sespe Pipeline operation. To determine the amount of equipment and services needed to address the response strategies appropriate to areas that could be impacted by a spill, a shoreline response planning volume has been calculated based on a reasonable worst-case spill for the facility.

5.1.1 Reasonable Worst Case Spill

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



5.1.3 OSPR Shoreline Response Planning Volume

The OSPR Response Planning Volume is (b) (7)(F). (Note: The Planning Volume calculated pursuant to 33 CFR Part 154, Appendix C, Section 7 is not applicable to the Sespe Pipeline.)

5.2 SHORELINE RESPONSE EQUIPMENT AND SERVICES

Section 6.1 and Appendix E of this plan describes the oil spill response organization capable of effecting shoreline cleanup operations. The plan clearly defines oil spill response personnel duties and responsibilities.

Seneca has entered into a contract with four approved contractors to meet shoreline equipment and service requirements of this response plan. These contractors include:

- Clean Seas (shoreline protection only)
- Patriot Environmental Services, Double Barrel Environmental

Additional local contractors for spill response are provided in Appendix B, List of Contacts. All shoreline response equipment is appropriate of use in the Santa Barbara Channel Area risk zone and for containing and recovering Group 3 medium crude. The shoreline cleanup equipment and protective boom available to Seneca is appropriate for the specific types of shoreline described in Section 5.4 of this plan.

5.2.1 Location, Inventory And Ownership Of Response Equipment

Patriot, and Double Barrel are approved OSRO responders, have their own response equipment, and complete independent Drills of the equipment. Refer to Section 501 of the Clean Seas' Regional Resource Manual for the Clean Seas equipment list.

5.2.2 Seneca Response Equipment Storage, Maintenance, Inspection and Testing

Response equipment is inspected quarterly. The inspection is assigned by means of a quarterly inspection report. Upon completion of inspection, the report is signed off and sent to Management. The next quarterly inspection date is placed on the calendar.

5.2.3 Oil Spill Response Personnel

The personnel available to respond to an oil spill from Sespe Pipeline are described in Section 4.4 of this plan. Seneca will rely primarily on the manpower capabilities of Clean Seas, Patriot, and Double Barrel for shoreline protection and cleanup.

5.3 RESERVED

5.4 SHORELINE RESPONSE AND CLEANUP STRATEGIES

5.4.1 Area Of Potential Impact

The largest reasonable worst-case spill was estimated to be (b) (7) (F) (b). While it is likely that this spill could reach marine waters, only if Sespe Creek and the Santa Clara River are flowing, a (b) (7)(F), (b) trajectory analysis contained in the Clean Seas Regional Resource Manual (Section 202) for a facility located near the Mandalay area has been assumed to be representative of the worst case spill assuming the oil reaches the mouth of the Santa Clara River. This area is just south of the mouth of the Santa Clara River. (Note: The spill trajectory envelope represents the outer perimeter of shore side areas that could receive oil in the event of any spill. The envelope is based on regional extremes of climate, tide, current, and wind, and assumes pessimistic dispersion and other adverse weather conditions. This trajectory envelope does not represent the trajectory of any one spill.)

The trajectory analysis is used in this plan to:

- Identify the personnel and equipment resources, which must be available for response.
- Identify specific areas where equipment and services must be available for containment and cleanup.

The trajectory analysis concluded that immediately after release of the oil, spreading of the spill would occur primarily from physical spreading processes. Within the first 12 hours, the (b) (7)(F), (b) (3) be expected to occupy a patch approximately one nautical mile in diameter. By three days, the spill patch would be approximately three nautical miles in diameter.

According to the analysis, transport of the spill away from the source would be due primarily to longshore coastal currents and wind-induced surface drift. The direction and strength of this transport varies seasonally and with the direction, strength, and persistence of local winds. Westward transport, which would be expected when the westward-flowing coastal current is strongest (spring and summer) and/or when the winds are from the east and southeast, could move the spill to Santa Barbara after one day and within three nautical miles of Point Conception after three days. During periods when the westward coastal current is weak (fall and winter) and when westerly winds are present, the spill would move eastward along the coast, reaching within 10 nautical miles of Point Dume after one day and within 10 nautical miles of Santa Monica after three days. Santa Ana wind conditions combined with weak coastal currents would cause spill transport to the south, across the Santa Barbara Channel. Within three days, the spill could move across the channel to the islands of San Miguel, Santa Rosa, Santa Cruz and Anacapa.

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

Seneca is committed to ensuring they have an oil spill response organization capable of effecting shoreline cleanup operations for the largest area of impact (i.e., Ventura and Santa Barbara Country shorelines, and the Channel Islands of San Miguel, Santa Rosa, Santa Cruz, and Anacapa).

The potentially impacted area is one of exceptional biological richness and diversity. Ten mariculture facilities exist along the mainland coast producing primarily abalone, scallops, mussels, and oysters. Kelp beds are leased for harvesting rights both along the mainland and Channel Islands.

Recreational use in this area is significant as evidenced by the presence of 13 County and local beach parks, 11 State beach parks, and the Channel Islands National Park and Marine Sanctuary. Coastal recreational activities include boating, swimming, surfing, kayaking, fishing, diving, and observing nature.

The entire area supports abundant kelp forests, numerous finfish and shellfish fisheries, and a wide variety of sea birds and marine mammals. The Channel Islands are particularly rich and diverse and their uniqueness has led to their designation as a National Park and National Marine Sanctuary.

The area's geomorphology includes:

- Exposed wave-cut cliffs, seawalls, and piers (second most abundant shoreline type in area with a total of 72 miles).
- Exposed wave-cut platforms (most abundant shoreline type with a total of 87 miles).
- Fine-to-medium-grained sand beaches (third most abundant shoreline type in area with a total of 70 miles).
- Coarse-grained sand to gravel beaches (fourth most abundant shoreline type with a total of 64 miles).
- Mixed sand and gravel beaches (34 miles).
- Gravel beaches and rip-rap structures (32 miles)
- Sheltered tidal flats (six miles in seven locations).
- Salt marshes (21 miles)

The Clean Seas Regional Resource Manual, Section 303 fully describes sensitive resource areas and shoreline types and provides a sensitivity ranking system to them, in order of their increasing potential for long-term oil persistence and biological damage. A map of sensitive resources in the Santa Barbara Channel is provided in Appendix D.

5.4.2 Cleanup Strategies

Shoreline oil conditions may range from those which require immediate and thorough cleanup to lightly oiled areas where no cleanup may be the most environmentally sound option. The amount and type of oil, sensitivity, substrate or shoreline, type, accessibility and traffic-ability, and exposure are all factors that influence technique selection and in fact, whether or not cleanup should be required at all.

Seneca, in concert with Clean Seas, state and federal OSCs, the appropriate natural resource trustees, and, if applicable, the particular landowner(s) or manager(s), will determine the final selection of cleanup techniques. A useful tool in this determination is to perform a Net Environmental Benefit Assessment (NEBA) for all affected shorelines prior to the initiation of cleanup operations. Guidelines for conducting a NEBA are provided in Section 304 of the Clean Seas Regional Resource Manual. NEBA involves the comparison of the potential impacts of a particular cleanup technique or program with the anticipated impacts or consequences of leaving the oil to natural degradation processes.

Key factors to consider are:

- Safety of the cleanup crews.
- Existing impacts of the oil on the health of the local ecological community.
- Toxicity of the oil and the anticipated persistence of the toxic effects.
- Recruitment or re-colonization potential of the affected area.
- Potential impacts of the candidate cleanup technique(s).
- Potential effectiveness of the cleanup operation.
- Aesthetic impact of the oil.

NEBA is also useful for evaluating when cleanup should be terminated. In most cases,

cleanup reaches a point of diminishing returns where the level of effort and intrusive nature of the cleanup increases exponentially as the amount of oil decreases.

There are several cleanup techniques most commonly used:

- Manual removal
- Flushing/flooding
- Spot washing
- Mechanical removal
- Beach cleaning
- Sorbents
- Natural recovery

It is likely that only a few techniques would be used for most spill situations. Section 304 and Appendices A and B of the Clean Seas Regional Resource Manual describe shoreline response protection and cleanup strategies.

5.4.3 Potential Impacts From Cleanup Operations

The environmental and physical consequences of using the various cleanup techniques should be considered to minimize the overall impact of the spill incident. In some situations, the cleanup techniques can have a greater adverse impact than the oil itself.

The major physical impacts of cleanup typically result from sediment removal. Large-scale removal from a shoreline or steeply sloped terrestrial area can destabilize the beach or slope and result in erosion or landslides.

Other techniques, such as flooding, flushing, spot washing, manual removal, etc., can also cause physical impacts including:

- Substrate disturbance and vegetation trampling caused by extensive manual activity.
- Recontamination by oil that is removed but not effectively recovered.
- Increased turbidity and sedimentation by flushing fine sediments from a shoreline into the water.
- Deeper oil penetration from flushing and spot washing on shorelines and

trenching and berm construction on terrestrial areas.

The biological impacts from cleanup can include:

- Removal of biota through sedimentation excavation, flushing, and spot washing.
- Extension of toxic effects due to re-oiling.
- Habitat disruption by cleanup equipment, waste handling, or cleanup crews.
- Trampling of shoreline biota from manual and mechanical methods.
- Wildlife disturbance due to noise and commotion created by equipment and cleanup crews.

This is particularly relevant to marshes where vegetation trampling and substrate disturbance during cleanup operations can create more of an impact and inhibit recovery to a much greater degree than if no actions were taken.

Cleanup techniques should be implemented to reduce effects on organisms and vegetation outside the treatment area. Equipment and personnel traffic should be controlled to avoid transporting oil to clean areas or pushing it deeper into the substrate. If shoreline oil conditions are light to very light and exposure to the elements is high, natural recovery should be considered as it may have the least overall physical and biological impact.

In the case of many large aquatic spills, a variety of shorelines may be impacted to various degrees, requiring cleanup operations to be prioritized. Priority ranking for each shoreline segment or area is dependent on several factors including:

- Degree of sensitivity.
- Degree of oil impact.
- Potential for remobilization of oil.
- Persistence of stranded oil.

A decision guide to assist in establishing shoreline cleanup priorities is provided in Clean Seas Region Resource Manual, Section 304.

SECTION SIX: EMERGENCY RESPONSE PROCEDURES

6.1 RESPONSE ORGANIZATION

6.1.1 Introduction

Seneca has established an oil spill response organization consisting of two interrelated response teams, an Initial Response Team (IRT) and a Spill Management Team (SMT), to respond to an oil spill from the pipeline. The design of the response organization is based on the Incident Command System (ICS), a crisis management system now widely used by private and public emergency response organizations because it provides the capability and flexibility to respond to a wide range of emergency incidents. Personnel assigned specific positions in the IRT and SMT are required to be thoroughly familiar with their roles and responsibilities, and participate in specified training programs and exercises simulating oil spill events.

Seneca has also named a Qualified Individual and Designated Alternate (see Section 1.2). These persons are responsible for overall spill response management and commitment of resources to a response effort.

6.1.2 Initial Response Team

In the event of an oil spill from the pipeline, the IRT will be activated immediately and will provide Seneca's initial response. The team is prepared to contain and recover minor spills and take immediate actions to control larger spills.

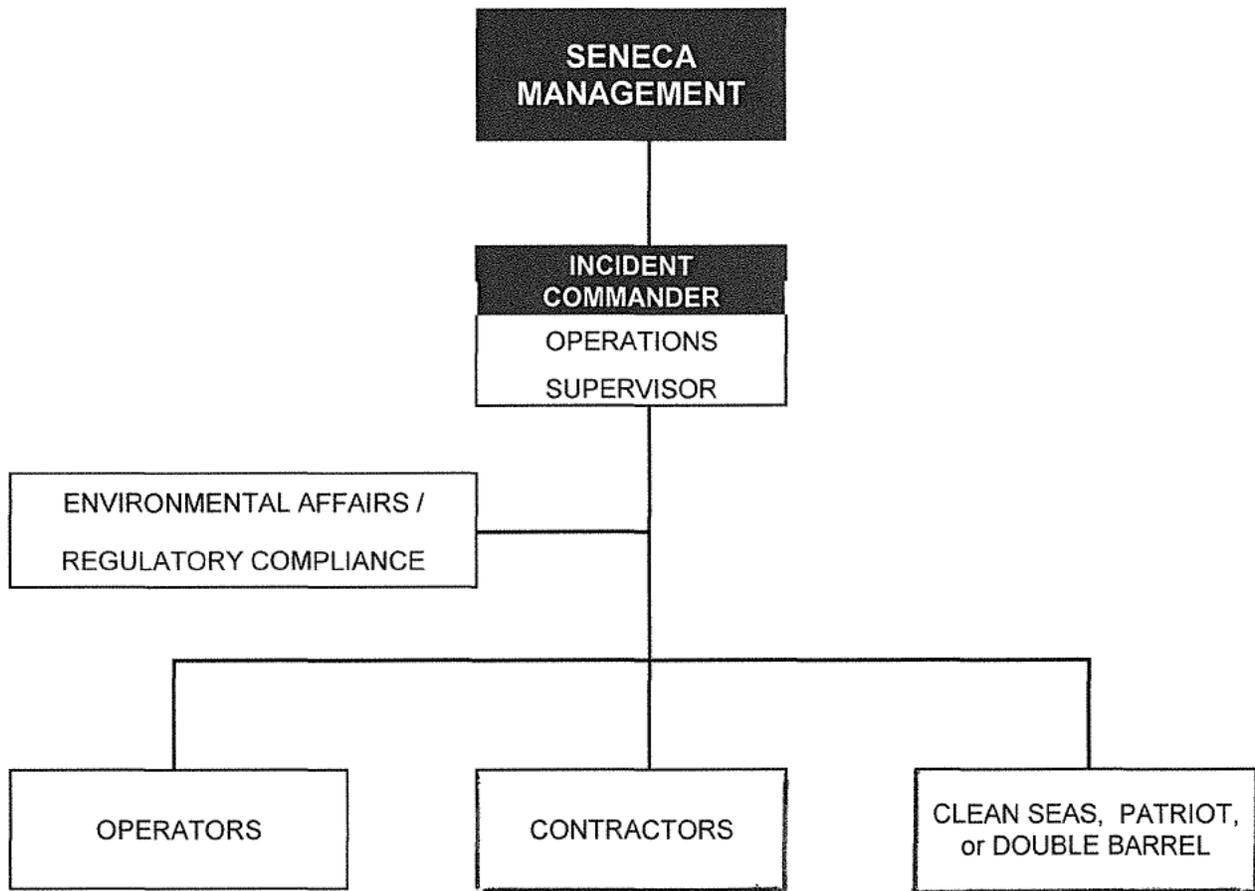
The organizational structure of the IRT is shown in Figure 6-1. The IRT is headed by the the Operations Supervisor. If a spill occurs when the Operations Supervisor is not on site, then the Lead Operator/Senior Person-In-Charge assumes control of the IRT, pending arrival of Seneca's Operations Supervisor. The IRT consists of all operations personnel on site at the immediate return, onsite contractors, Patriot, Double Barrel, and Clean Seas (if the spill is to, or threatening, marine waters).



FIGURE

6 - 1

Initial Response Team



NOTES:
 The Senior Person - In - Charge on duty assumes control over the Initial Response Team pending arrival of the Operations Superintendent.

6.1.3 Spill Management Team

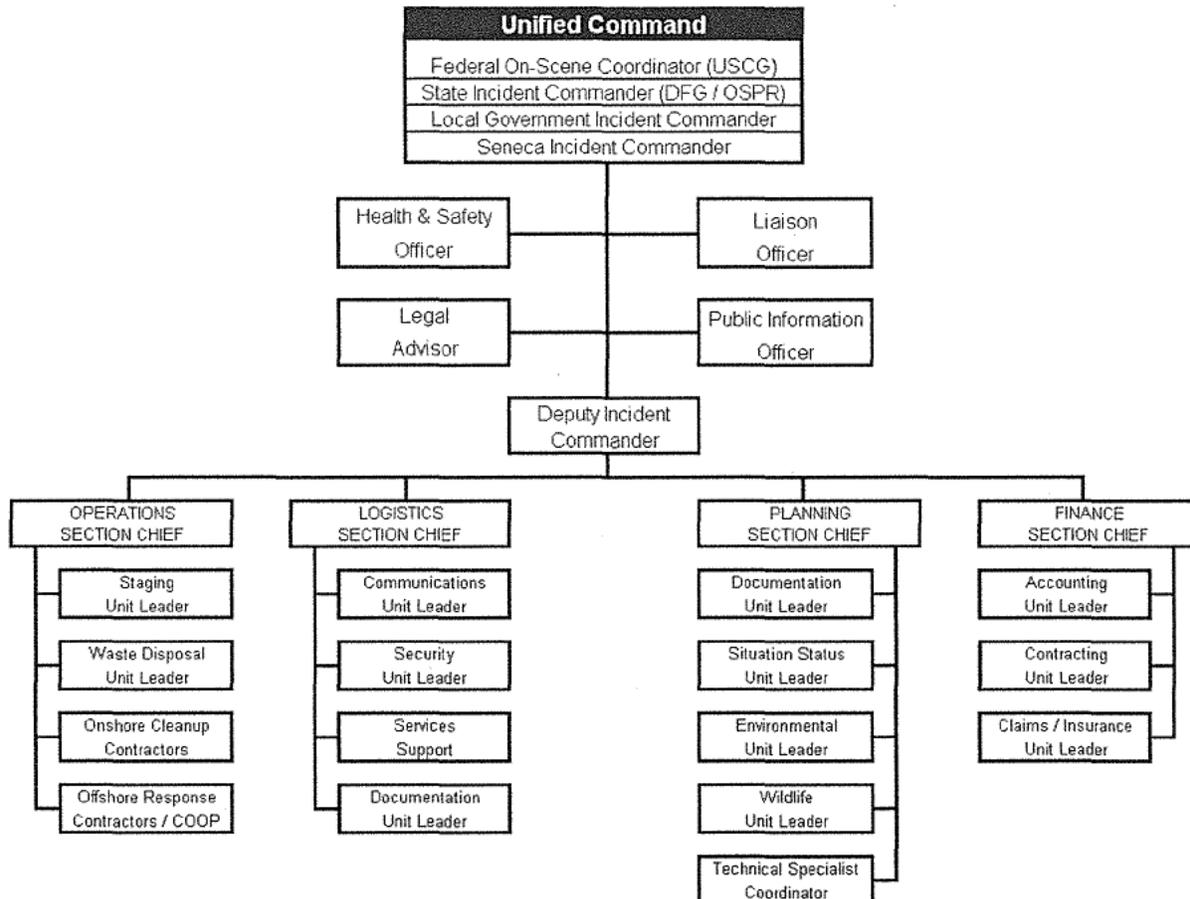
Seneca's SMT (see Figure 6-2) is designed and organized to respond to a worst-case discharge from the pipeline. The SMT is designed to augment and/or expand the capabilities of the IRT as needed. The degree to which the SMT is activated is dependent on the nature and size of the incident. All personnel on Seneca's response teams are qualified and trained to initiate and carry out response operations. Responsibilities of the SMT are summarized in Table 6-1. Detailed job descriptions are provided in Appendix E.

The SMT may consist of Seneca, Patriot, Double Barrel, and other contract personnel who will be called in to manage and direct response operations during a major spill incident. Upon activation of the SMT, the IRT personnel are then included in the SMT, while they continue to work in response to the emergency.

For all major spills, representatives from the six functional groups of the SMT will be on scene within 24 hours of the onset of the event. Clean Seas will also be called in for all spills to and/or threatening marine waters.

Seneca's organization is structured to allow Seneca to participate in the Unified Command System at the appropriate decision-making level. It is designed to develop proactive consensus building in anticipation of response requirements; thereby making liaison and direct communication among key response decision makers (i.e., Seneca, Patriot, Double Barrel, and federal, state, and local agencies) an integral and continuous part of the emergency response process. At the same time, Seneca retains its own organizational chain of command and direct control of its personnel and resources.

Spill Management Team



NOTES:

1. The degree of activation of the Spill Management Team (SMT) will vary depending on the type and size of the incident.
2. Unified Command is applied when incident is multi-jurisdictional in nature.
3. Under OPA 90, the Federal On-Scene Coordinator has the ultimate responsibility related to directing oil spill response objectives and strategies.

TABLE 6-1: RESPONSIBILITIES OF THE SMT

POSITION	RESPONSIBILITY
Seneca Management	Seneca Management is responsible for ensuring that the pipeline has an organization structured to deal with the incident, that lines of authority are delegated to carry out essential functions, and that company line management assemble the necessary personnel to carry out needed functions to assist in the response.
Incident Commander	The Incident Commander is the person-in-charge of the incident and is responsible for the overall management of all incident activities, including the development and implementation of a response strategy that provides for safe control, containment, and cleanup activities. This function is carried out by the Operations Superintendent or the Senior Person-In-Charge.
Deputy Incident Commander	The Deputy Incident Commander assists the Incident Commander on all aspects of the incident. He ensures that the directives of the Incident Commander are carried out.
Legal Advisor	The Legal Advisor provides legal advice on all aspects of the incident and is responsible for all legal matters,
Liaison Officer	The Liaison Officer is responsible for communicating with local, state, and federal government agencies and community organizations. He is also responsible for the coordination of the utilization of volunteers.
Public Information Officer	The Public Information Officer is responsible for the formulation and release of information about the incident to the news media and other appropriate agencies and organizations.
Safety Officer	The Safety Officer is responsible for monitoring and assessing hazardous and unsafe situations, and developing measures for assuring personnel safety.
Logistics Section Chief	The Logistics Section Chief ensures adequate arrangements, including transportation for equipment, materials, and personnel on a 24-hour basis and on very short notice.
Communications Unit Leader	The Communications Unit Leader is responsible for establishing, operating, and maintaining an integrated communications network (both radio and telephone) for the response.
Support Unit Leader	The Support Unit Leader is responsible for supervising the acquisition of personnel, equipment, transportation, and facilities needed to support response operations.
Services Unit Leader	The Services Unit Leader is responsible for managing the delivery of food, maintenance, materials handling, fabrication, and medical services associated with response operations
Security Unit Leader	The Security Unit Leader is responsible for the overall security needs of the response efforts. His responsibilities include providing security for facilities, staging areas, and personnel, as necessary.
Operations Section Chief	The Operations Section Chief is responsible for all offshore, near shore, and land operations directly applicable to control, containment, and cleanup.
Staging Unit Leader	The Staging Unit Leader is responsible for locating and establishing staging area(s) for both onshore and offshore response operations. He manages all activities within the staging area(s).

TABLE 6-1: RESPONSIBILITIES OF THE SMT (cont.)

POSITION	RESPONSIBILITY
Waste Disposal Unit Leader	The Waste Disposal Unit Leader is responsible for ensuring that all activities related to the temporary storage, transportation, and disposal of waste materials are conducted in an environmentally sound manner.
Planning Section Chief	The Planning Section Chief is responsible for providing advice and assistance to the Incident Commander with respect to response planning and procedures. He is responsible for the development of the daily response plans and their revision, as necessary.
Environmental Unit Leader	The Environmental Unit Leader is responsible for managing all environmental issues associated with the incident, response, and clean-up. He is responsible for preparing, submitting, and tracking all permitted activities associated with the response effort.
Wildlife Unit Leader	The Wildlife Unit Leader is responsible for working in cooperation with the Trustee agencies (i.e., California Department of Fish and Game, U.S. Fish and Wildlife Services, and National Marine Fisheries) to ensure that every possible effort is made to retrieve, clean, and rehabilitate affected wildlife.
Documentation Unit Leader	The Documentation Unit Leader is responsible for keeping a detailed log of events, their timing, and minutes and for maintaining accurate and complete incident files.
Situation Status Unit Leader	The Situation Status Unit Leader is responsible for tracking the resources assigned to the incident. He maintains and displays information on the nature and status of response operations.
Technical Specialist Coordinator	The Technical Specialist Coordinator is responsible for providing general technical assistance to the Spill Management Team. He manages the identification and acquisition of technical personnel that may be necessary to support response operations.
Finance Section Chief	The Finance Section Chief is responsible for all financial and administrative aspects of the incident response, including cost analysis for procurement of resources, development of a project budget, accounting, clerical support, contracts, and data processing.
Accounting Unit Leader	The Accounting Unit Leader is responsible for administering all financial matters pertaining to vendor and service contracts.
Contracting Unit Leader	The Contracting Unit Leader is responsible for negotiating, maintaining, and/or closing all contracts used during the response incident.
Claims/Insurance Unit Leader	The Claims/Insurance Unit Leader is responsible for processing claims and arranging with insurers settlements resulting from the occurrence of a serious injury, death, or damages attributable to the incident.

As part of the Unified Command, Seneca will work with the responsible agencies to:

- Determine overall incident objectives.
- Select response strategies.
- Ensure the joint planning of tactical objectives.
- Ensure the conduct of integrated tactical operations.
- Make maximum use of all assigned resources.

Seneca's Public Information Officer will interface with his counterparts in the Unified Command, as well as with the media and appropriate government agencies. He will establish a public information office that will serve as the central clearing point for dissemination of information from Seneca to the Unified Command, media, government agencies, and public interest groups. This office will work with the Joint Information Center (JIC) established by the USCG and DFG/OSPR to provide the JIC with situation and resource status reports, media feeds, supporting documentation, and to conduct joint news conferences, when feasible.

6.2 LOGISTICS SUPPORT

6.2.1 Central Command Post

Seneca recognizes that its Sespe Office may not be strategically located or sufficient to accommodate local, state, and federal response organizations, in addition to its own. In the event of a major incident, Seneca would initially establish an emergency command post at its Sespe Oak Flat Office or Warehouse. The center would be relocated, if necessary, to a hotel or office building complex that could accommodate all parties of the Unified Command and provide reasonable access to the spill site.

6.2.2 Central Communications Post

Seneca would co-locate its central communications center with its relocated central command post. Additionally, Seneca would rely on Clean Seas' mobile communications center and their communications capabilities at the Clean Seas yard in Carpentaria.

6.2.3 Staging Areas

Seneca has pre-identified the yards next to the Sespe Oak Flat Office and Sespe Warehouse as a potential staging areas. The Staging Unit Leader is responsible for managing activities at the staging area(s) and for identifying additional areas, if necessary.

Staging areas may be selected for utilization as equipment and material storage sites, equipment repair and maintenance areas, temporary storage areas for oil spill-related wastes, etc. These sites will be located with good access to the cleanup operations and to nearby streets and highways. Good storage sites are flat areas such as paved parking lots. The selection of all site(s) will be subject to regulatory requirements and approvals.

Temporary waste storage sites will be selected and prepared to minimize contamination of surrounding areas from leaching oil. All area drains in the vicinity of a site will be identified and, in the event of a spill, all potentially affected drains will be diked. The waste storage sites will not be located on or adjacent to ravines, gullies, streams, or the sides of hills; but will be located on areas with a minimum slope and above the high water mark. Access to the storage sites will be controlled and a five-mile-per-hour speed limit will be enforced within these sites. A spill control kit will be kept at each site. This kit will include a patch kit for potential leaking containers and a supply of sorbent and socks.

6.3 RESPONSE OPERATIONS FLOWCHART

Figure 6-3 depicts the procession of each major stage of spill response operations from spill discovery to completion of cleanup.

6.4 INITIAL SPILL RESPONSE PROCEDURES

6.4.1 Objectives

Seneca's operational goal for the lease is zero spillage of oil. To achieve this goal, Seneca is committed to the utilization of equipment and systems that comply with government rules and regulations and/or meet industry standards, and to the adherence to sound operational and maintenance procedures. In addition, to ensure response preparedness, all employees and contractors associated with operations at the lease are required to be thoroughly familiar with this plan and must participate in specified training programs and exercises simulating oil spill circumstances.

The primary objectives in responding to any spill are:

- To save lives and prevent injuries of personnel.
- To minimize environmental impacts.

Although response actions vary depending on the incident, general priorities have been assigned to response actions for satisfying these objectives. A summary of these priorities is provided in Table 6-2.

6.4.2 Initial Detection of a Spill by Onsite Personnel

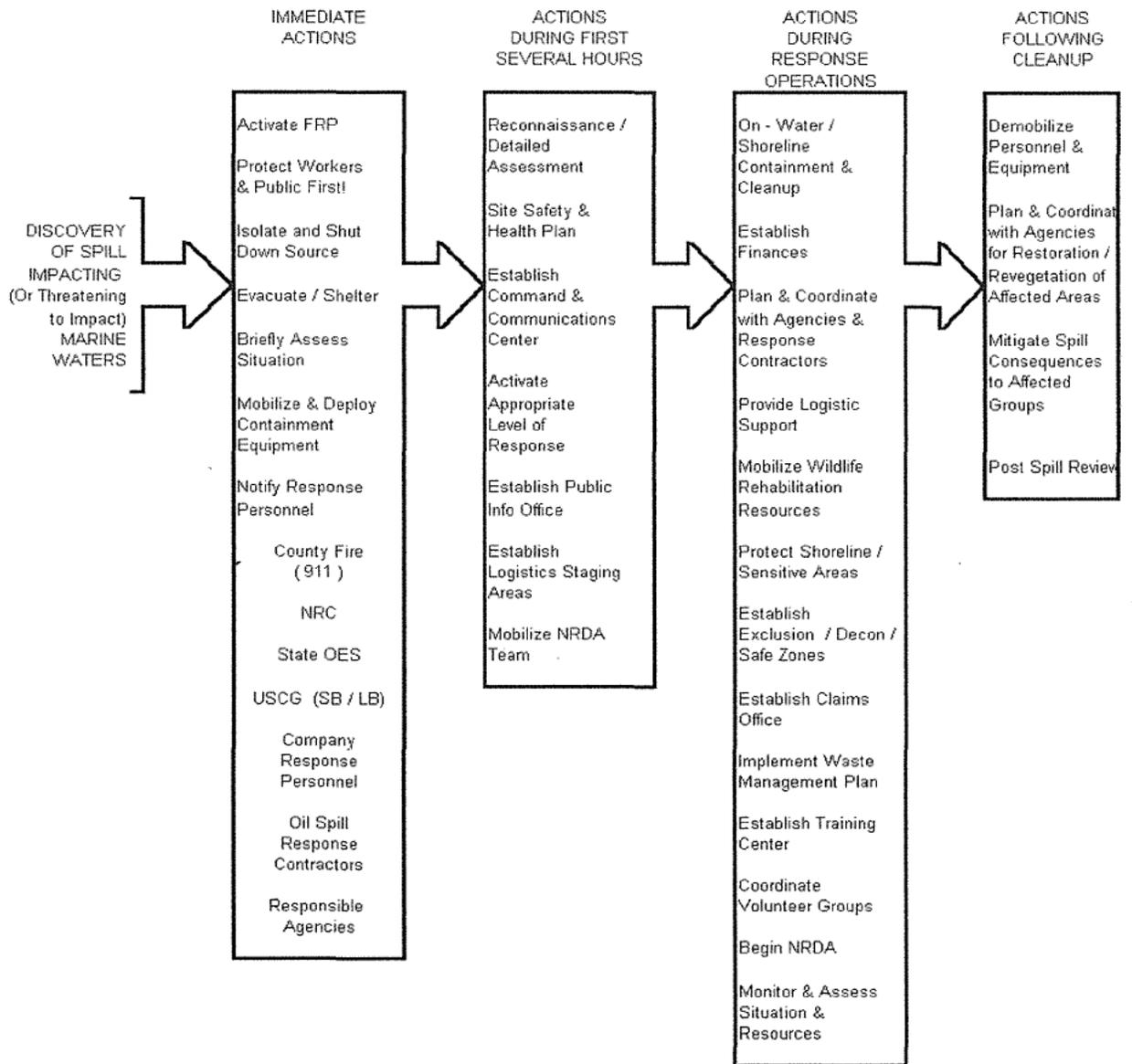
Early detection of spilled oil and as immediate a response after the discovery are critical in ensuring the health and safety of personnel and in minimizing the effects on the environment. An Initial Detection Action Checklist is provided in Table 6-3.



FIGURE

6 - 3

Oil Spill Response Flowchart



Note: Response Actions Implemented will Depend on the Magnitude and Extent of the Spill Incident

TABLE 6-2: GENERAL PRIORITIES OF SPILL RESPONSE ACTIONS

PRIORITY	ACTION
1	Save lives and prevent injuries. Dial 9-1-1 to report a medical emergency or serious injury. Provide first aid.
2	Initiate response actions. Take immediate action to try to stop the flow of oil if possible and if it can be done safely and quickly. Report the event to the Operations Supervisor or Senior Person-In-Charge. Activate the Initial Response Team. Deploy onsite spill response equipment. Control the effects of the accident.
3	Assess situation and make required notifications. Report circumstances to Operations Supervisor or Senior Person-In-Charge as soon as possible. Notify Clean Seas to assist or stand by. Notify the National Response Center, and California Emergency Management Agency. If spill to or threatening marine waters, notify U.S. Coast Guard 11th District and Clean Seas to assist or standby. Activate the Spill Management Team, if necessary.
4	Minimize damage. Prevent or minimize damage to the environment. Identify and protect sensitive resources and habitats. Mobilize and deploy additional equipment and manpower from private contractors and public agencies, as necessary. Notify additional government agencies. Maximize utilization of resources.
5	Clean up and restore the affected areas. Provide the Federal On-Scene Coordinator with Offshore/Onshore/Shoreline Cleanup Plan, Waste Disposal Plan, and Restoration Plan for approval. Implement plans efficiently and effectively.

The actions of notifying the Operations Supervisor (or alternate) will result in the activation of the Initial and/or Spill Management Teams (see Section 6.1: Response Organization).

6.4.3 Initial Response To A Spill

Although remote, there is a risk of a spill associated with petroleum production operations. Possible spill scenarios identified include:

- the leak or rupture of a pipeline.
- the washout of a pipeline as a result of flooding.
- the rupture of a pipeline as a result of an earthquake.

The lease is attended 8 hours during the day, seven days a week, year-round. In the event of a spill, the initial response will be to:

- Activate the Initial Response Team.
- Dispatch the oil spill containment equipment.
- Call Clean Seas to standby if spill threatens, or for assistance if spill reaches marine waters.
- Activate Spill Management Team, if necessary.

The initial response will be managed by the Operations Supervisor or the Senior Person-In-Charge on site, until relieved by the Operations Supervisor. An Action Checklist is provided for the initial responses of the Senior Person-In-Charge (Table 6-4).

TABLE 6-3: INITIAL DETECTION ACTION CHECKLIST FOR ANY EMPLOYEE DETECTING A SPILL

√	INITIAL ACTIONS
	<p>Ascertain any immediate fire/explosion or toxic gas hazards. Warn any people near spill to stay clear of spilled oil, avoid breathing oil fumes, and avoid igniting the oil. Call 9-1-1 to report a medical emergency or serious injury.</p>
	<p>Try to stop the flow of oil from the spill source if it can be accomplished safely.</p>
	<p>Notify one of the following persons in the order listed until one of them is reached:</p> <ul style="list-style-type: none"> ■ Operations Supervisor ■ Operations Manager ■ Environmental Manager <p>and report the following information:</p> <ul style="list-style-type: none"> ■ Location of the spill ■ Type of spill ■ Source of spill and status of shutdown (if known) ■ Size of spill (To estimate the size of the spill, refer to Figure 6-4 on the following page that relates the appearance of oil on water to the volume of the spill and the area of the slick.) ■ Direction of spread

6.4.4 Onsite Spill Response Techniques

Seneca's onsite response techniques are built upon the equipment and manpower resources available to the pipeline. Additional assistance is available from Patriot in Santa Clarita, Ventura, or Bakersfield and Double Barrel in Riverside or Bakersfield.

In the event of a spill threatening or to marine waters, Seneca would rely on the expertise of Clean Seas' personnel and their response vessels and equipment.

6.5 EMERGENCY PROCEDURES

Prioritized emergency response procedures are provided for the following emergencies in tabular format:

- Table 6-5: Piping Rupture
- Table 6-6: Piping Leak
- Table 6-7: Explosion and/or Fire
- Table 6-8: Equipment Failure
- Table 6-9: Medical Emergency
- Table 6-10: Shutdown Procedure
- Table 6-11: Evacuation Checklist

TABLE 6-4: OIL SPILL RESPONSE ACTION CHECKLIST FOR USE BY SENIOR PERSON-IN-CHARGE

ACTIONS TO BE TAKEN	COMPLETE (TIME/INITIAL)
Warn personnel to avoid breathing oil fumes and to avoid igniting oil. Direct use of protective breathing apparatus and clothing, as necessary.	
Ensure personnel safety and call 9-1-1 to report a medical emergency or serious injury. Provide first aid, if needed.	
Try to stop the flow of oil from the source, if it can be accomplished safely.	
Dispatch the oil spill containment equipment. If spill to or threatening marine waters, call Clean Seas for assistance or to stand by.	
Assess the situation, using Information on Discharge (Appendix C, Form 1) and notify Environmental Manager who will, if outside assistance is needed, activate the Spill Management Team, obtain assistance as needed from outside contractors, other cooperatives, and government agencies.	
<p>If Environmental Manager cannot be reached immediately, make the following required government agency notifications:</p> <ul style="list-style-type: none"> ■ National Response Center. ■ California Emergency Management Agency. <p>If spill to or threatening marine waters.</p> <ul style="list-style-type: none"> ■ U.S. Coast Guard 11th District. <ul style="list-style-type: none"> - Santa Barbara - Long Beach 	
Collect information related to the spill event. Document actions and telephone calls/conversations, using forms provided in Appendix C.	

TABLE 6-5: PIPING RUPTURE RESPONSE PROCEDURES

ACTIONS TO BE TAKEN	RESPONSIBLE PERSON ¹	COMPLETE (TIME/INITIAL)
Assess situation/take command EXERCISE CAUTION²	Operator or Operations Supervisor	
"ESD" and shut down affected line	Operator	
If person down, notify Senior Person-In-Charge and rescue/evacuate threatened person (if safe to do so) ²	Person discovering victim	
Eliminate all ignition sources onsite	Operator	
Call 9-1-1 to report a medical emergency or serious injury. <ul style="list-style-type: none"> ■ Your Name, Company and Phone Number ■ Type of Emergency ■ Location of Emergency ■ Route to approach (e.g., wind is blowing from north, so approach from west) ■ Number and type of injuries 	Person discovering release	
Contain spill (if safe to do so)	Operator	
Assign person to direct emergency response vehicles	Operations Supervisor	
Monitor area with gas detectors to determine vapor area ²	Operator	
Make necessary notifications (See Table 7-1)	Environmental Manager	
Brief fire department upon arrival	Operations Supervisor	
Coordinate deployment of containment and recovery equipment	Operations Supervisor	
Designate staging areas for personnel and equipment	Operations Supervisor	
Coordinate activities of local clean-up contractors	Operations Supervisor	

TABLE 6-5: PIPING RUPTURE RESPONSE PROCEDURES (Continued)

ACTIONS TO BE TAKEN	RESPONSIBLE PERSON ¹	COMPLETE (TIME/INITIAL)
Set up Command Post, if warranted	Operations Supervisor	
Ensure safety of personnel involved in spill response activities	Operations Supervisor	
Caution against smoking, use of flash cameras, or other sources of ignition	Operations Supervisor	
Keep persons not involved in response at least 300 feet from spilled oil	Operations Supervisor	
Brief agency personnel on arrival	Operations Supervisor. Environmental Manager	
¹ Or other qualified personnel ² Appropriate personal protective equipment must be worn.		

TABLE 6-6: PIPING LEAK RESPONSE PROCEDURES

ACTIONS TO BE TAKEN	RESPONSIBLE PERSON ¹	COMPLETE (TIME/INITIAL)
Assess situation/take command EXERCISE CAUTION²	Operator or Operations Supervisor	
"ESD" if necessary and shut down affected line	Operator	
If person down, notify Senior Person-In-Charge and rescue/evacuate threatened person (if safe to do so) ²	Person discovering victim	
Eliminate all ignition sources onsite	Operator	
Call 9-1-1 to report a medical emergency or serious injury. <ul style="list-style-type: none"> ■ Your Name, Company and Phone Number ■ Type of Emergency ■ Location of Emergency ■ Route to approach (e.g., wind is blowing from north, so approach from west) ■ Number and type of injuries 	Person discovering release	
Contain spill (if safe to do so)	Operator	
Assign person to direct emergency response vehicles and to guard gates	Operations Supervisor	
Monitor area with gas detectors to determine vapor area ²	Operator	
Make necessary notifications (See Table 7-1)	Environmental Manager	
Brief fire department upon arrival	Operations Supervisor	
Coordinate deployment of containment and recovery equipment	Operations Supervisor	
Designate staging areas for personnel and equipment	Operations Supervisor	
Coordinate activities of local clean-up contractors	Operations Supervisor	
Set up Command Post, if warranted	Operations Supervisor	
Ensure safety of personnel involved in spill response activities	Operations Supervisor	
Caution against smoking, use of flash cameras, or other sources of ignition	Operations Supervisor	

TABLE 6-6: PIPING LEAK RESPONSE PROCEDURES (Cont'd)

ACTIONS TO BE TAKEN	RESPONSIBLE PERSON ¹	COMPLETE (TIME/INITIAL)
Keep persons not involved in response at least 300 feet from spilled oil	Operations Supervisor	
Brief agency personnel on arrival	Operations Supervisor, Environmental Manager	
¹ Or other qualified personnel. ² Appropriate personal protective equipment must be worn.		

TABLE 6-7: EXPLOSION AND/OR FIRE RESPONSE PROCEDURES

ACTIONS TO BE TAKEN	RESPONSIBLE PERSON¹	COMPLETE (TIME/INITIAL)
Assess situation/take command EXERCISE CAUTION²	Operator or Operations Supervisor	
"ESD" if necessary	Operator	
If person down, notify Senior Person-In-Charge and rescue/evacuate threatened person (if safe to do so) ²	Person discovering victim	
Call 9-1-1. <ul style="list-style-type: none"> ■ Your Name, Company and Phone Number ■ Type of Emergency ■ Location of Emergency ■ Route to approach (e.g., wind is blowing from west, so approach from south to our gate) ■ Number and type of injuries 	Person discovering release	
Attempt to extinguish fire (if safe to do so)	Operator	
Eliminate all ignition sources onsite	Operator	
Assign person to direct emergency response vehicles	Operations Supervisor	
Make necessary notifications (See Table 7-1)	Environmental Manager	
Brief fire department upon arrival	Operations Supervisor	
Inspect system integrity ²	Operator	
Check off-site areas for damage	Operator	
¹ Or other qualified personnel. ² Appropriate personal protective equipment must be worn.		

TABLE 6-8: EQUIPMENT FAILURE RESPONSE PROCEDURES

ACTIONS TO BE TAKEN	RESPONSIBLE PERSON¹	COMPLETE (TIME/INITIAL)
Assess situation/take command EXERCISE CAUTION²	Operator or Operations Supervisor	
"ESD" if necessary	Operator	
Make necessary notifications (See Table 7-1)	Environmental Manager	
Evaluate risk of spill and/or fire/explosion and refer to other checklist as necessary	Operations Supervisor	
¹ Or other qualified personnel. ² Appropriate personal protective equipment must be worn.		

TABLE 6-9: MEDICAL EMERGENCY CHECKLIST

ACTIONS TO BE TAKEN	RESPONSIBLE PERSON¹	COMPLETE (TIME/INITIAL)
Assess situation/take command EXERCISE CAUTION²	Operator or Operations Supervisor	
Call for assistance by radio or if no radio send next person who arrives for help	Operator	
Alert others or sound alarm	Operator	
Call 9-1-1 to report a medical emergency or serious injury. <ul style="list-style-type: none"> ■ Your Name, Company and Phone Number ■ Type of Emergency ■ Location of Emergency ■ Route to approach ■ Number and type of injuries 	Operations Supervisor	
Provide appropriate first aid. Do not attempt to move victim until extent of injuries has been determined.	Person discovering victim	
Make necessary notifications/investigations (Table 7-1)	Environmental Manager	
Brief fire department upon arrival	Operations Supervisor	
¹ Or other qualified personnel. ² Appropriate personal protective equipment must be worn.		

6.6 SHUTDOWN PROCEDURES

Shutdown procedures for the pipeline are provided in Table 6-10.

6.7 EVACUATION PLAN

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

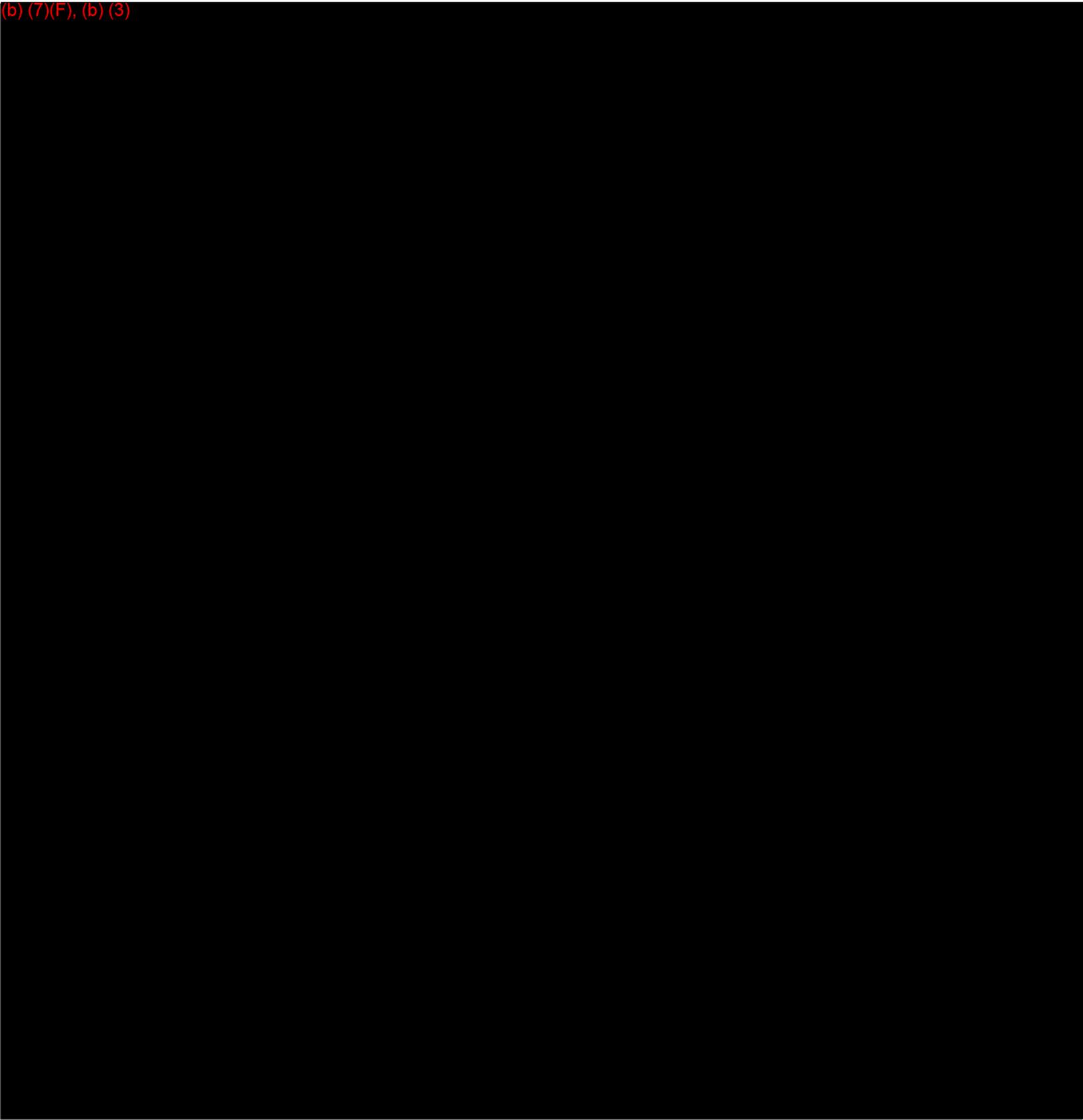




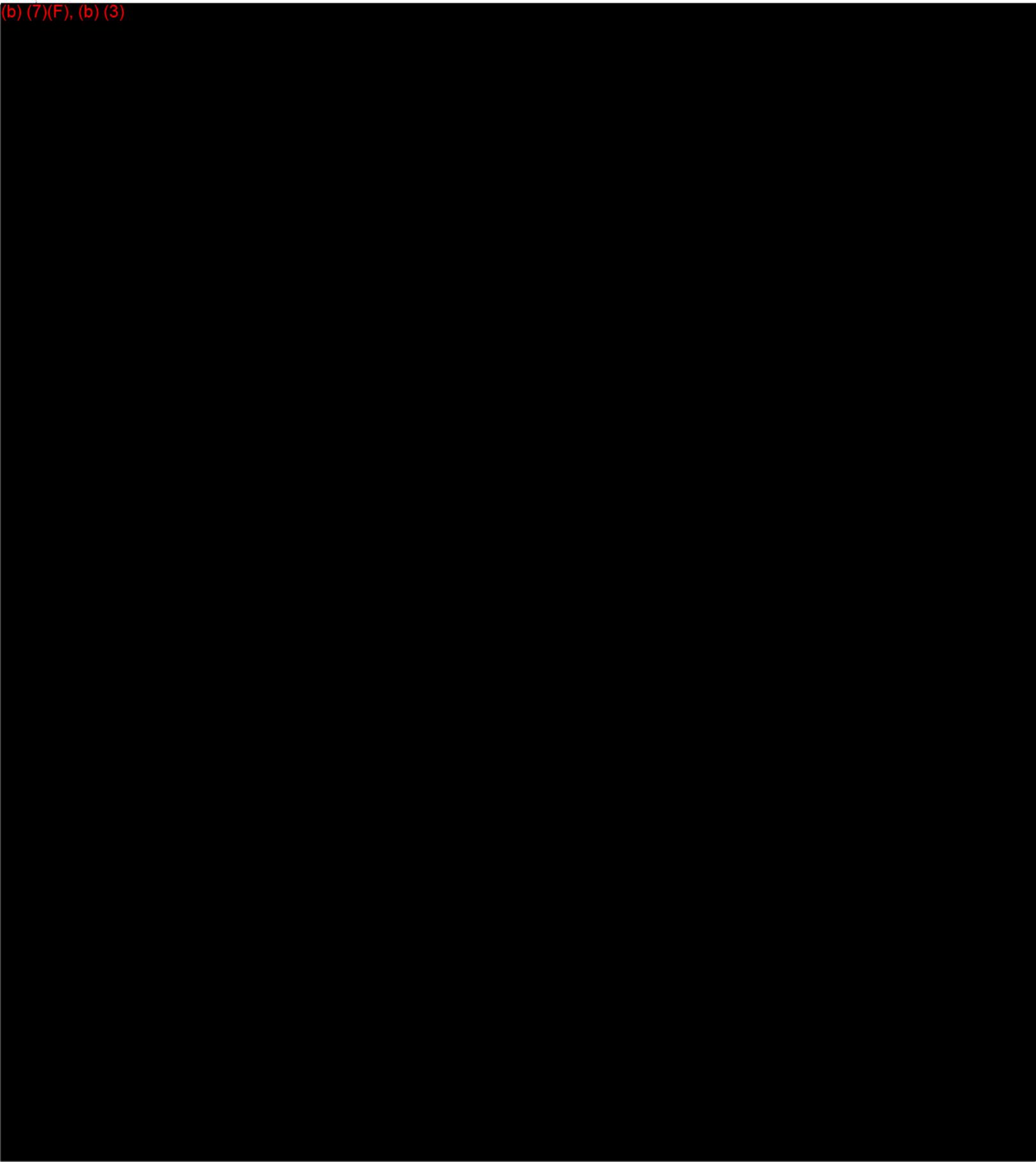
TABLE 6-10: SHUTDOWN PROCEDURE

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6.8 SECURITY PLAN

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

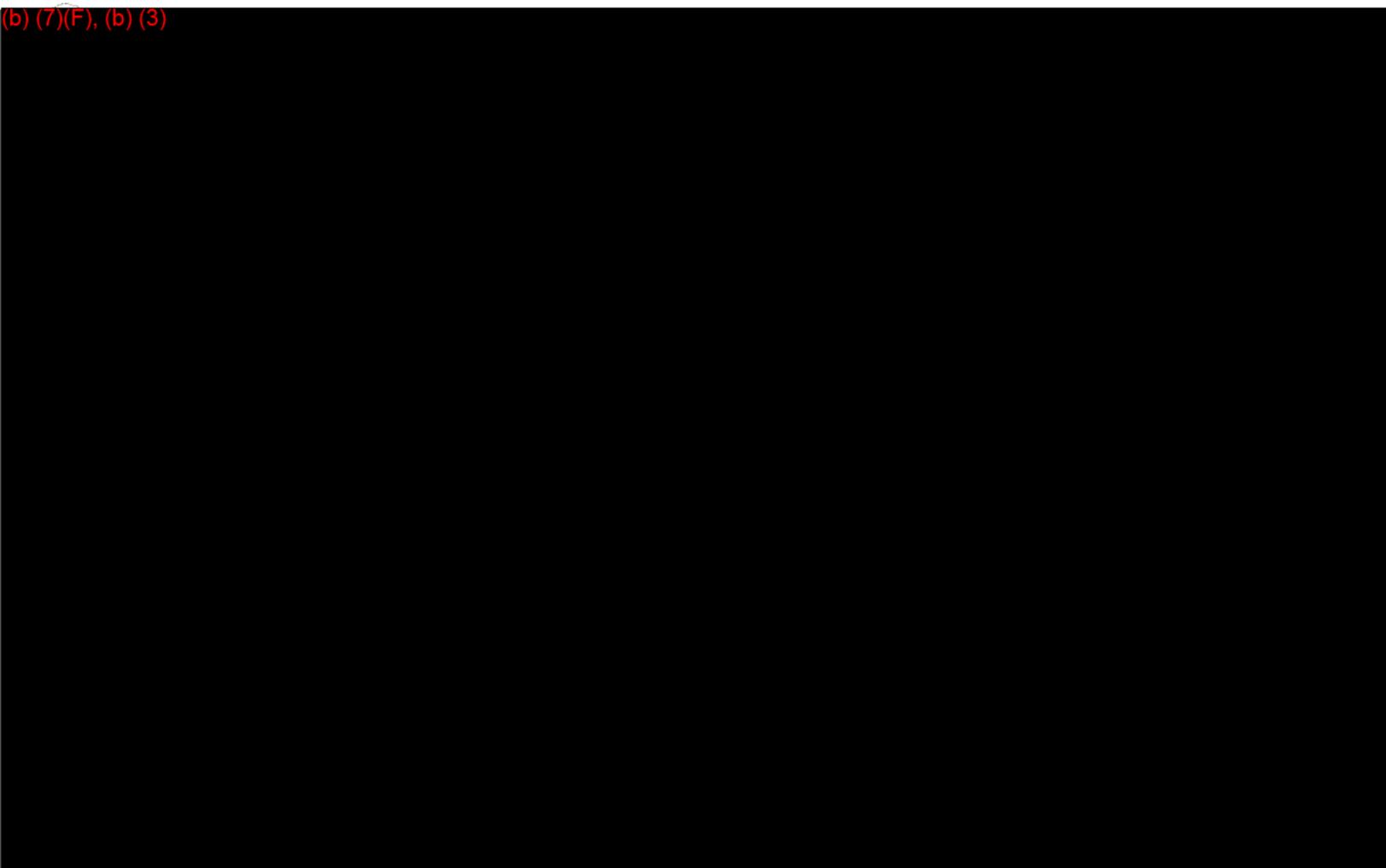


6.8.4 Random Drug/Alcohol Testing Program

Seneca conducts a random drug/alcohol testing program which meets or exceeds the requirements of the U.S. Department of Transportation. Employees or contractors involved in accidents or incidents on the facility may be drug screened and are subject to disciplinary actions if positive results are found.

6.8.5 Civil Disturbance

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



6.9 DECONTAMINATION PROCEDURES

6.9.1 Introduction

Personnel responding to hazardous substance incidents may become contaminated in a number of ways including:

- Contacting vapors, gases, mists, or particulates in the air.
- Being splashed by materials while sampling or opening containers.
- Walking through puddles of liquids or on contaminated soil.
- Using contaminated instruments or equipment.

Protective clothing and respirators help prevent the wearer from becoming contaminated or inhaling contaminants; while good work practices help reduce contamination on protective clothing, instruments, and equipment.

Even with these safeguards, contamination may occur. Harmful materials can be transferred into clean areas, exposing unprotected personnel. In removing contaminated clothing, personnel may contact contaminants on the clothing or inhale them. To prevent such occurrences, methods to reduce contamination, and decontamination procedures must be developed and established before anyone enters a site and must continue (modified when necessary) throughout site operations.

Decontamination consists of physically removing contaminants or changing their chemical nature to innocuous substances. How expansive decontamination must be depends on a number of factors, the most important being the type of contaminants involved. The more harmful the contaminant, the more extensive and thorough decontamination must be. Less harmful contaminants may require less decontamination.

Combining decontamination, the correct method of doffing personnel protective equipment, and the use of site work zones minimizes cross contamination from protective clothing to wearer, equipment to personnel, and one area to another. Only general guidance can be given on methods and techniques for decontamination. The exact procedure to use must be determined after evaluating a number of factors specific to the incident.

6.9.2 Contamination Control

The **Safety Officer** will establish control at a contaminated response site to reduce the possibility of exposure to any contaminants including their transport by personnel and/or equipment from the site.

Various procedures include:

- Set up security and physical barriers to exclude unnecessary personnel and visitors from the contaminated area.
- Minimize the number of personnel and equipment onsite consistent with effective operations.
- Establish work zones within the site to reduce the migration of hazardous substances from contaminated areas to clean areas.
- Establish control points to regulate access to work zones.
- Conduct operations in a manner that reduces exposure of personnel and equipment and the potential for airborne dispersion.

6.9.2.1 Work Zones And Control Points

Work zones prevent or reduce the migration of contamination from a site where operations occur and access control points limit the movement of personnel and equipment between zones and onto the site itself. By these means, contamination is contained within relatively small areas and its potential for spread is minimized.

The **Safety Officer** will establish three contiguous zones surrounding each separate contaminated area on the site where response operations are to take place.

These zones will include:

- Zone 1: Exclusion Zone.
- Zone 2: Contamination Reduction Zone.
- Zone 3: Support Zone.

Movement of personnel and equipment into and out of the contaminated areas and between zones will be limited to access control points located upwind of the contaminated area.

The Exclusion Zone (Zone 1), the innermost of the three contiguous zones, is the zone where contamination is known or suspected to occur based on the results of the preliminary site characterization. All personnel working in the Exclusion Zone will be required to wear the specified Levels of Protection. (Different Levels of Protection in the Exclusion Zone may be designated based on site-specific sub-area conditions and job assignments.) An entry and exit access control point will be established to regulate the flow of personnel and equipment into and out of the zone and to verify that the procedures established to enter and exit are followed. The access control point will be located upwind of the contaminated areas along the outer boundary (i.e., the Hotline) of Zone 1.

The Hotline will be clearly marked for easy identification. The Hotline will initially be established by visually surveying the immediate area of the incident and determining the locations of the involved hazardous substance(s), leachate, and/or spilled material, and any drainage; and whether any discolorations are visible. Guidance in determining the boundary will also be provided from monitoring data obtained during the initial site survey. Additional factors that will be considered include the distances needed to prevent fire and/or an explosion from affecting personnel outside the zone, the physical area needed to conduct response operations, and the potential for contaminants to be blown from the area. The boundary may be modified and adjusted over time as more information becomes available.

The Contamination Reduction Zone (Zone 2) is located between the Exclusion and Support Zones. Initially, it will be a clean area designed to provide a transition between contaminated and clean areas. Zone 2 serves as a buffer to further reduce the probability of the clean zone from becoming contaminated or from being affected by other existing hazards. Decontamination of personal protective clothing and equipment will take place

at a series of stations within the Contamination Reduction Corridor. This corridor extends from the Hotline of the Exclusion Zone through the Contamination Reduction Zone.

The boundary between the Contamination Reduction Zone and the Support Zone (Zone 3) is the Contamination Control Line. Entry and exit between Zones 2 and 3 will be restricted to access control points upwind of Zone 1 on the Contamination Control Line. Personnel entering Zone 2 will be required to wear the prescribed personal protective equipment and those entering the Zone 3 will be required to remove any personal protective equipment worn in Zone 2.

The Support Zone (Zone 3), the outermost part of the site, is a clean area that may include the Field Command Post, transport vehicles, equipment, supplies, etc. Its location is dependent on accessibility, wind direction (ideally upwind from Zone 1; however, wind shifts may preclude this), and availability of resources (e.g. adequate roads, power, water, shelter). Normal work clothes are appropriate for this zone. No contaminated clothing, equipment, or samples will be permitted in this zone. Traffic will be restricted to authorized response personnel.

6.9.3 Decontamination

6.9.3.1 Site Plan layout

The **Safety Officer** will develop specific decontamination procedures for personal protective equipment and field equipment. Separate but similar procedures will be established for both field and personal protective equipment to prevent the transfer of contaminants from the Exclusion Zone. All field equipment will be transferred from the Exclusion Zone through a separate corridor in the Contamination Reduction Corridor to a central pad in the support Zone or to another location. (Decontamination of sampling equipment for quality assurance reasons is considered a separate issue from these procedures. The EPA Regional Laboratories can provide information on proper decontamination methods.) A separate access corridor for the transport of non-

contaminated equipment and personnel will extend from the Support Zone directly into the Exclusion Zone. Site layouts for minimum and maximum decontamination for Levels A through C are provided in Figures 6-5 through 6-9.

Personal protective equipment decontamination will take place at a series of stations placed at three-foot intervals within the Contamination Reduction Corridor. The number of stations will depend on the amount and type of personal protective equipment. The maximum number of decontamination stations will be required for personnel wearing Level A personal protective equipment. Decontamination procedures for lower levels of protection will consist of fewer decontamination stages for the amount of equipment worn or involve the elimination of wash and rinse stages when disposable clothing is used.

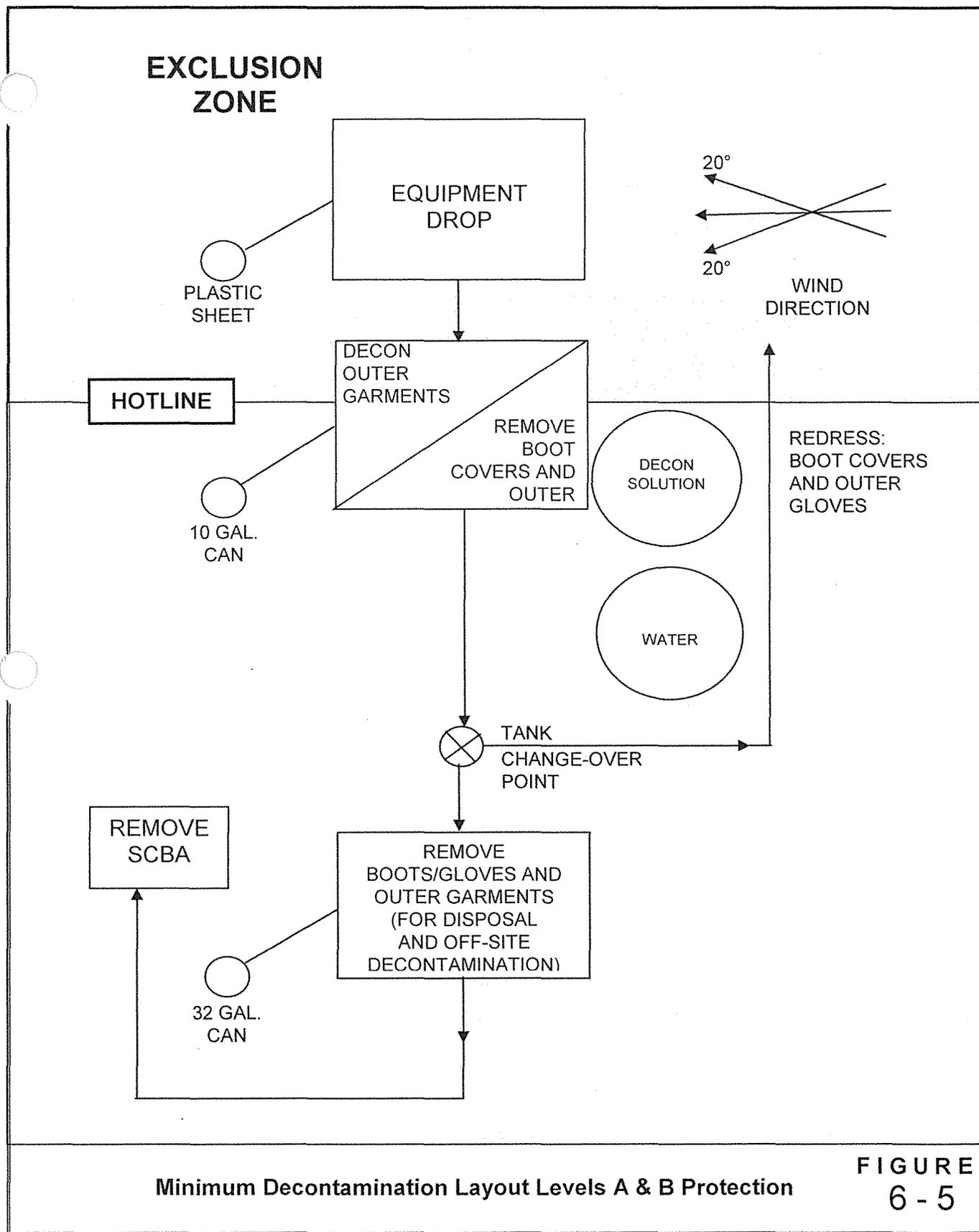
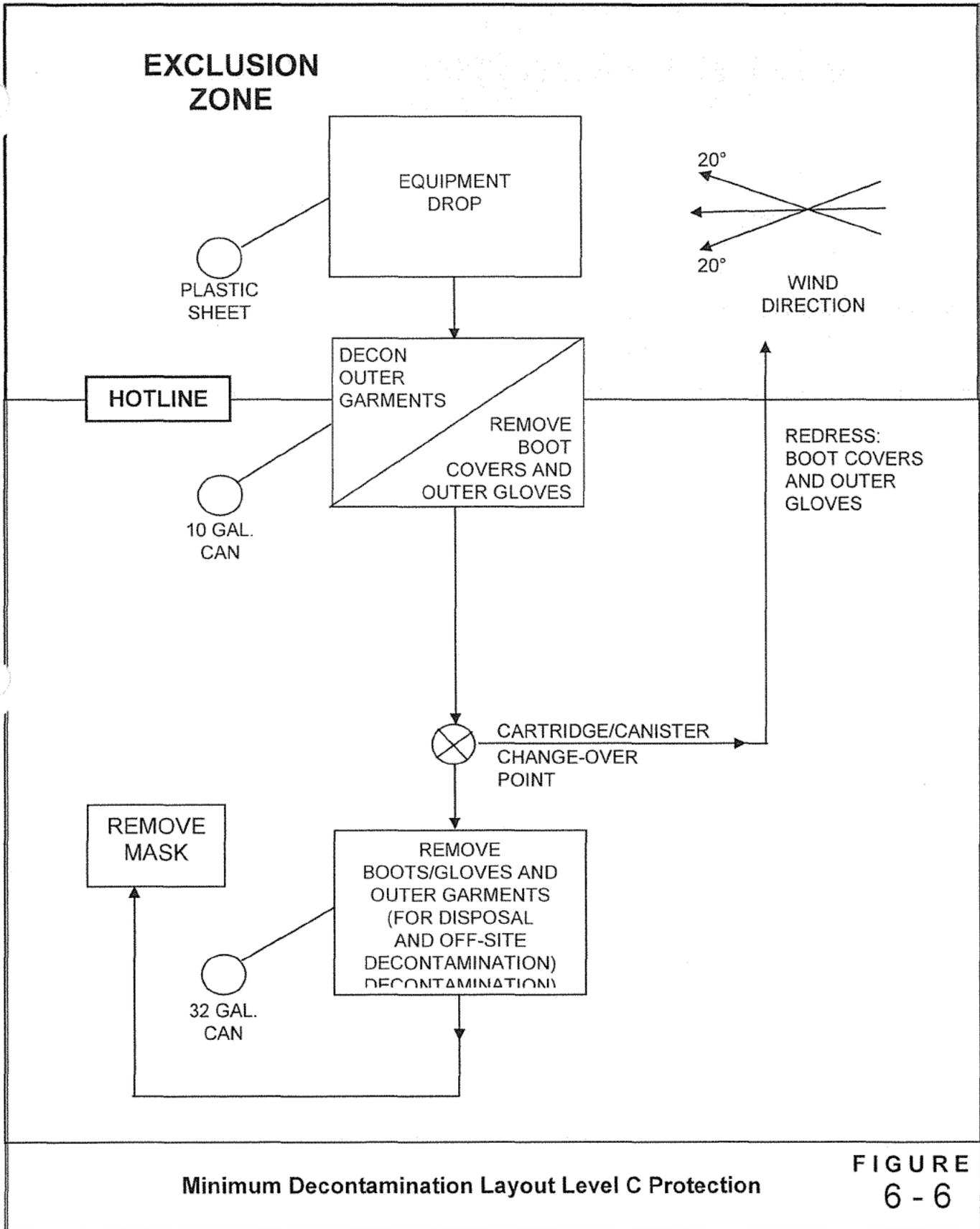
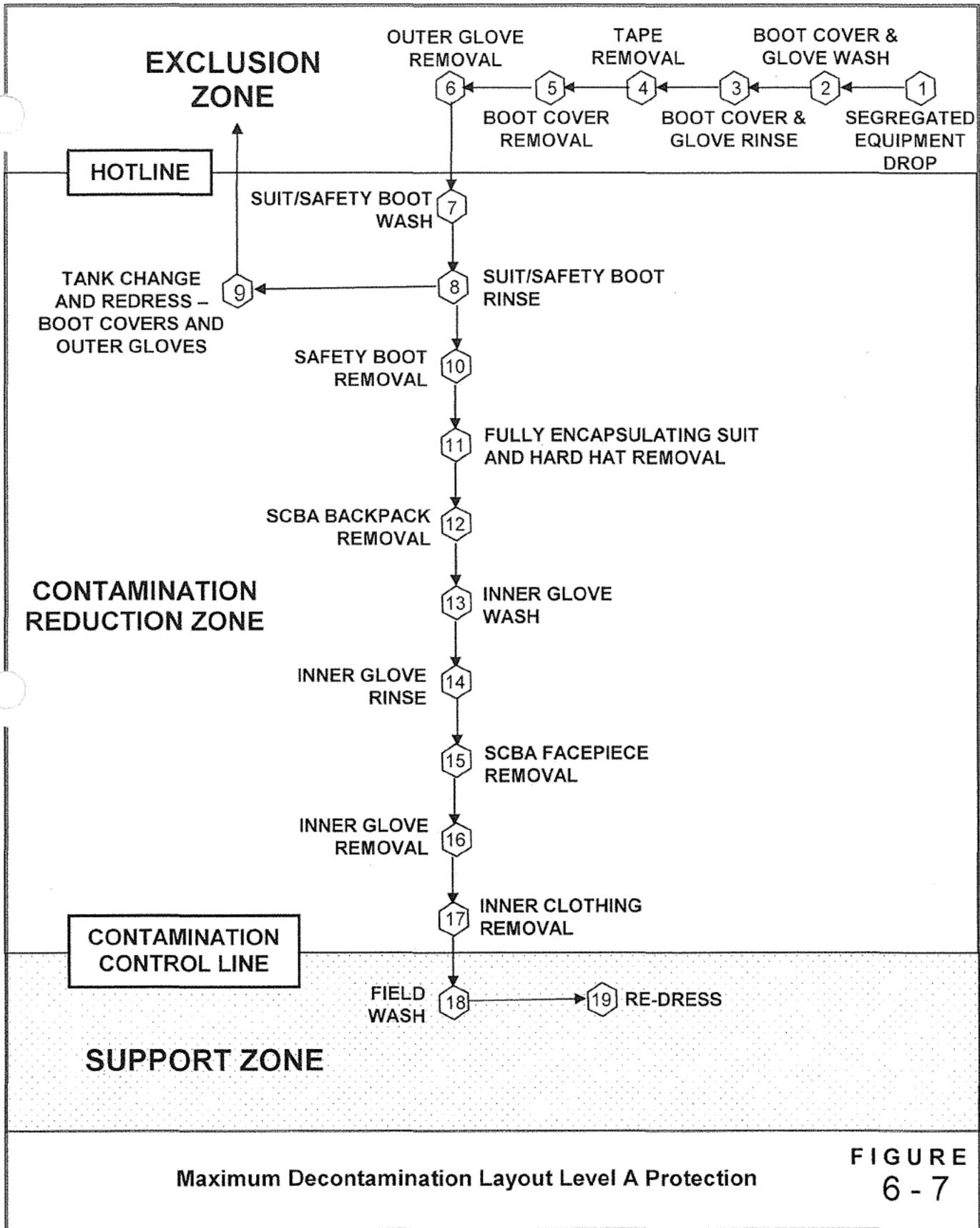


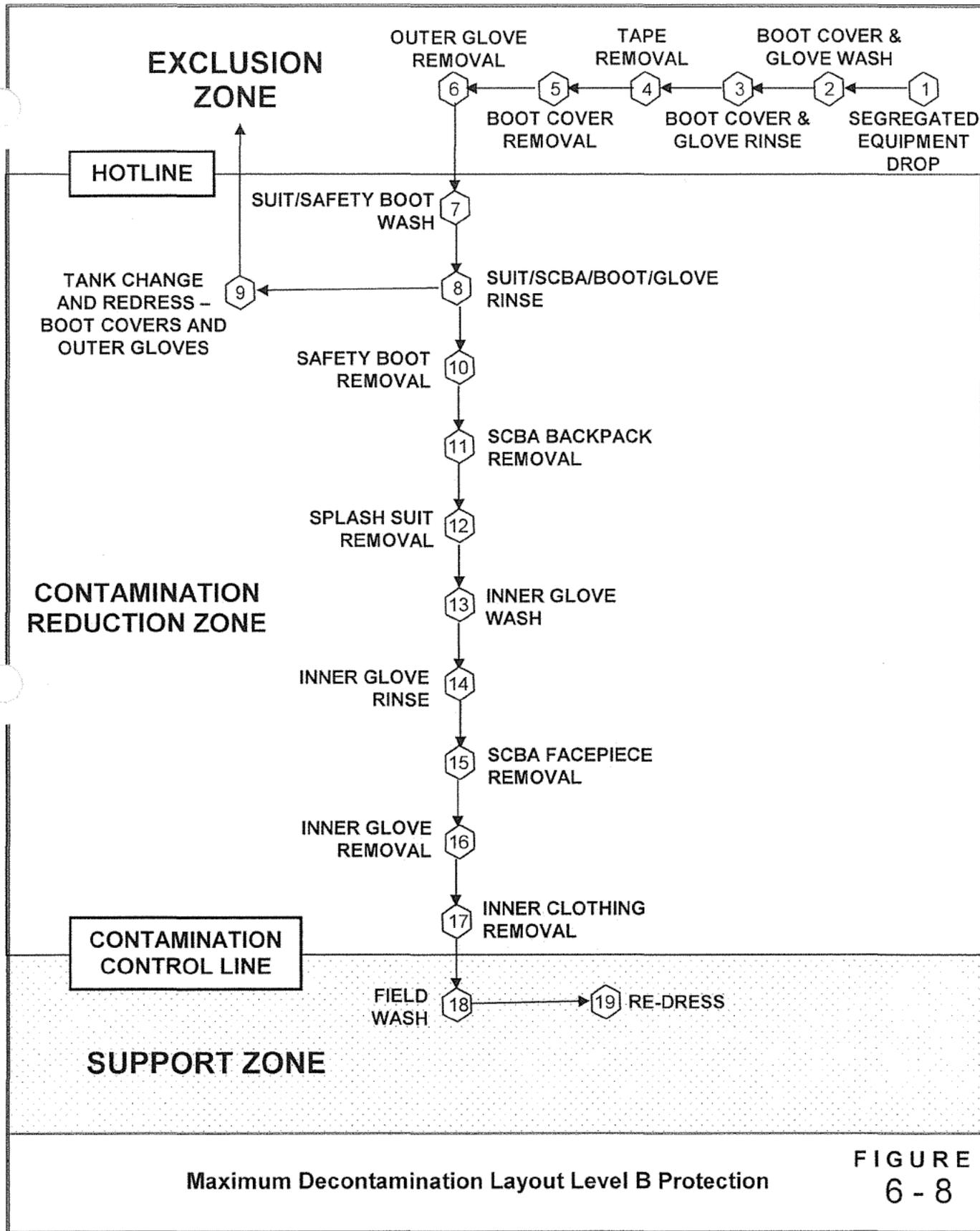
FIGURE 6-5





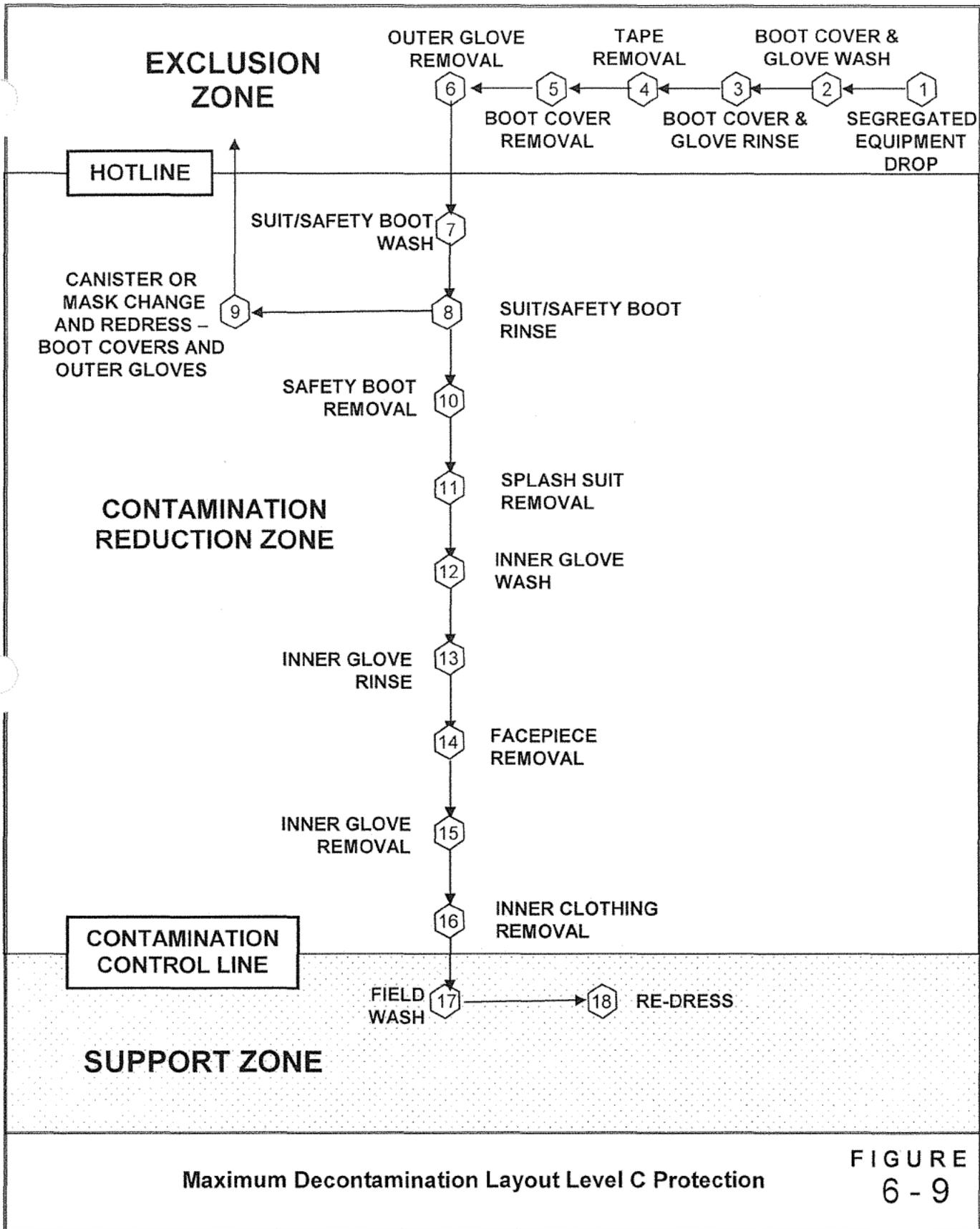
Maximum Decontamination Layout Level A Protection

FIGURE 6 - 7



Maximum Decontamination Layout Level B Protection

FIGURE 6 - 8



Maximum Decontamination Layout Level C Protection

FIGURE 6 - 9

The **Safety Officer** will identify the amounts and types of decontamination equipment and supplies required for site operations. He will also develop specific procedures for decontamination of equipment to be included in the Site-Specific Health and Safety Plan (see Appendix A). In developing these procedures, he will determine, using regulatory guidelines and assistance from an experienced chemist, what additional decontaminant chemicals are needed to remove specific contaminants that cannot be removed by detergent alone.

6.9.3.2 Decontamination Of Equipment

Insofar as possible, measures will be taken to prevent contamination of sampling and monitoring equipment. Sampling devices become contaminated, but monitoring instruments, unless they are splashed, usually do not. Once contaminated, instruments are difficult to clean without damaging them. Any delicate instrument which cannot be easily decontaminated will be protected while it is being used. It will be placed in a clean plastic bag, and the bag taped and secured around the instrument. Openings will be made in the bag for sample intake. Sampling devices require special cleaning. The EPA Regional Laboratories will be consulted on proper decontamination methods.

Wood tools are difficult to decontaminate because they absorb chemicals. They will be kept on site and handled only by protected workers. At the end of the response, wooden tools will be discarded. For decontaminating other tools, the EPA Regional Laboratories will be consulted.

Respirator parts, such as the harness assembly and leather or cloth components, are difficult to decontaminate. If grossly contaminated, they must be discarded. Rubber components can be soaked in soap and water and scrubbed with a brush. Regulators must be maintained according to manufacturer's recommendations. Persons responsible for decontaminating respirators will be thoroughly trained in respirator maintenance.

Bulldozers, trucks, backhoes, bulking chambers, and other heavy equipment are difficult to decontaminate. The method generally used is to wash them with water under high pressure and/or to scrub accessible parts with detergent/water solution under pressure, if possible. In some cases, shovels, scoops, and lifts have been sand blasted or steam cleaned. Particular care will be given to those components in direct contact with contaminants such as tires and scoops. Swipe tests will be utilized to measure effectiveness.

Respirators, reusable protective clothing, and other personal articles not only must be decontaminated before being reused, but also sanitized. The inside of masks and clothing becomes soiled due to exhalation, body oils, and perspiration. The manufacturer's instructions will be used to sanitize the respirator mask. If practical, protective clothing will be machine washed after a thorough decontamination; otherwise it will be cleaned by hand.

In some instances, clothing and equipment will become contaminated with substances that cannot be removed by normal decontamination procedures. A solvent may be used to remove such contamination from equipment if it does not destroy or degrade the protective material. If persistent contamination is expected, disposable garments will be used. Testing for persistent contamination of protective clothing and appropriate decontamination will be done by qualified laboratory personnel.

6.9.3.3 Disposal Of Contaminated Materials

At the completion of operations, the decontamination area(s) will be decommissioned. The transport and disposal of all waste materials will be managed by Seneca's **Waste Disposal Unit Leader** in accordance with all state and federal regulations and requirements.

All contaminated equipment will be scrubbed and rinsed and contaminated clothing and supplies will be placed in plastic lined garbage cans or similar containers. At the end of each day, the bags of contaminated clothing and materials will be transferred to a secure, central, temporary storage location. Spent wash and rinse solutions will also be transferred to drums or similar containers for temporary onsite storage.

6.10 COMMUNICATIONS PLAN

6.10.1 Communication Requirements

Good communications is one of the keys to the conduct of effective and efficient response operations. The **Communications Unit Leader** is responsible for the development and maintenance of the communications network throughout the response effort.

Communications requirements will fall into two basic categories:

- Primary communications necessary for the conduct of response operations.
- Secondary communications necessary to support response operations.

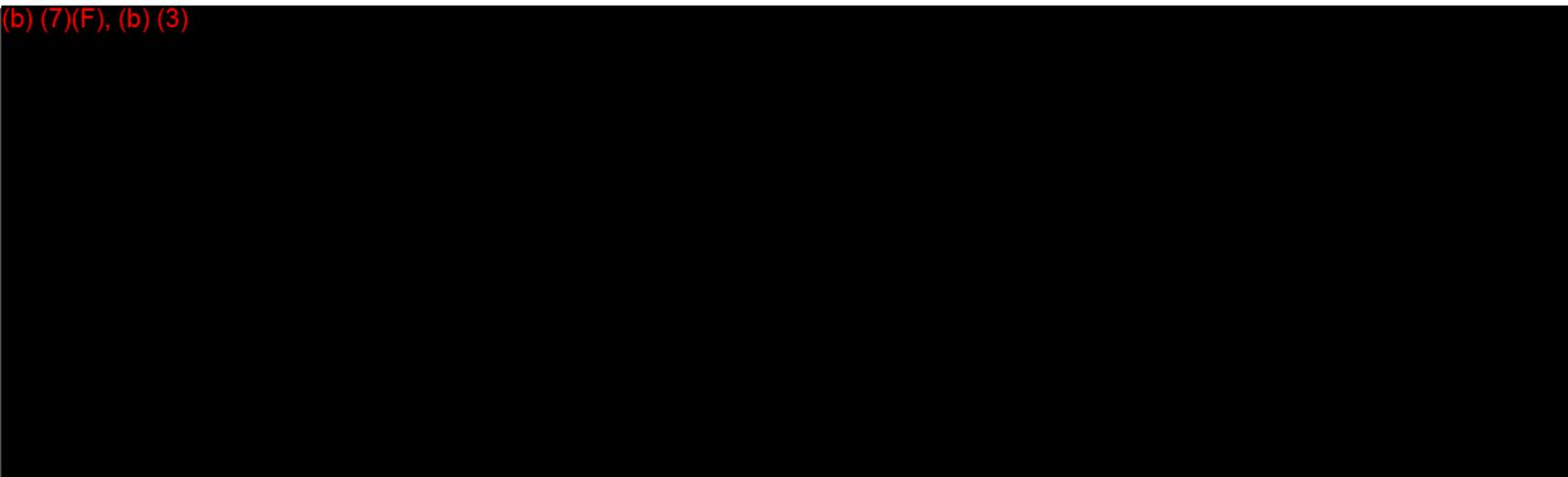
A comprehensive, integrated communications network must be established linking the command post(s) to field operations. The demand for good, clear, reliable communications equipment will be enormous during response operations. Redundancy must be built into the network. In addition, there will be an enormous demand for portable communications devices (e.g., cellular phones and hand held radios, including battery charging units and batteries) which will need to be carefully tracked when distributed.

6.10.2 Existing Communications Network

Communications during response operations will be facilitated by using Seneca's CB radio and telephone systems for its oil and gas operations. (see Table 6-12).

TABLE 6-12: SENECA'S COMMUNICATIONS NETWORK

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



6.10.3 Oil Spill Response Communications Network

During response operations, Seneca's existing communications network may be supplemented to provide an effective network linking the command posts, staging areas, and offshore vessels.

Supplemental communications equipment may include:

- Telephones (satellite, fixed, cellular)
- Fax machines
- Hand held radios
- Personal computers and air cards

During a major spill response, communications services will be contacted as soon as possible to augment existing telephone service, if necessary.

Communications with Clean Seas will be necessary to alert the management of Clean Seas to an oil spill and to communicate during response operations. The radio frequencies and telephone numbers of Clean Seas and the Clean Seas vessels are included in Table 6-13. Seneca may integrate its system with the Clean Seas system by placing a satellite portable phone in the Clean Seas Mobile Command Center. This will enable Seneca personnel to communicate with the Clean Seas Command Posts as well as Seneca cleanup supervisors.

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

6.11 POST-SPILL REVIEW PROCEDURES

Seneca has established post-spill review procedures to evaluate the effectiveness of the plan and the need for plan amendments. Following an incident, Seneca will conduct a meeting with key members of its response organization to evaluate the response effort. The Operations Manager and EHS Manager will prepare a critique that analyzes the results of the response and will suggest modifications to the plan, if necessary. Upon Seneca management approval, results of the review will be forwarded to the Manager, Operations – West for oil spill response within 90 days following the completion of response and cleanup procedures.

SECTION SEVEN: NOTIFICATION PROCEDURES

7.1 OVERVIEW

Seneca has in place a set of well-defined internal and external notification procedures. Procedures for reporting the threatened discharge of oil or discharge of oil to local, state, and federal agencies as required by Subsection 817.02 (g)(1)(A) are described below in Section 7.2.

These notification procedures establish a clear order of priority for notification. In the event of a drill, personnel are instructed by Seneca Management at the time of the drill to precede any notification statement with "**This is a drill.**"

The **Senior Person-In-Charge** is responsible for initiating the notification process. He is required to:

- Notify Ventura County Fire/Sheriff (9-1-1).
- Activate the Initial Response Team.
- Notify Clean Seas for spill threatening or to marine waters (within 30 minutes of discovery).
- Notify the Operations Supervisor.

The **Operations Supervisor** is always the **Senior Person-In-Charge** when he is on duty. He is also the Qualified Individual and can be reached 24-hours per day. The **Lead Operator** serves as the **Senior Person-In-Charge** when the Operations Supervisor is offsite or off duty. In addition, Seneca has established a toll free off-hours emergency numbers for the pipeline (1-888-595-8595).

7.2 IMMEDIATE NOTIFICATION PROCEDURES

An oil spill incident or a substantial threat of an incident at the lease will trigger a set of prioritized internal and external notifications. These notification procedures are summarized in Table 7-1.

Call lists are provided as follows:

- Table 7-2 Initial Response Team
- Table 7-3 Seneca Management, including Qualified Individual and Designated Alternate
- Table 7-4 Spill Management Team
- Table 7-5 Spill Management Team Call-Up Responsibilities

Telephone numbers for Seneca personnel, facilities, and offices; response contractors; and government agencies are provided in Appendix B, List of Contacts.

The notification procedures must be followed to completion. If the responsible person (see Table 7-1) is unable to notify a person listed, then the responsible person must make the notifications (if any) for that person.

The form "**Information on Discharge**" (Appendix C, Form 1) will be used to provide accurate oil spill incident information for the initial and follow-up notifications to federal, state, and local agencies. Copies of this form will be kept in the Sespe office.

Initial notifications will not be delayed, pending collection of all information on the form. All required government agency notifications will be made as soon as possible after the discovery of the spill or threatened discharge of oil.

TABLE 7-1: NOTIFICATION PROCEDURES

RESPONSIBLE PERSON	NOTIFICATION MADE	CALL LIST
Spill Observer	1. Senior Person-In-Charge	Table 7-2
Senior Person-In-Charge	1. Ventura Co. Fire/Sheriff 2. Initial Response Team 3. Clean Seas (Spill to Water) 4. Operations Supervisor	Appendix B, Table MCL-3 Table 7-2 Appendix B, Table MCL-2 Table 7-2
Operations Supervisor	1. EHS Manager 2. Operations Manager 3. Patriot or Double Barrel 4. Neighboring Companies ■ H.L. Hall & Sons (Paul Conaway) ■ T. B. Properties (Warren or Talwyn Thompson) ■ Cook (Carlos)	Table 7-3 Appendix B, Table MCL-5
EHS Manager	1. Manager of Administration 2. Spill Management Team as Necessary <u>Spill or HazMat/Waste Release:</u> 3. National Response Center 4. CA Emergency Management Agency 5. Ventura County Environmental Health <u>HazMat/Waste Release:</u> 6. Cal-EPA DTSC <u>Spill To Land/Water:</u> 7. CA Division of Oil and Gas (Land/Water) 8. Environmental Protection Agency (Land) 9. Bureau of Land Management (BLM Land) 10. State Fire Marshall (Pipeline Incident) 11. U.S. Coast Guard 11th District (To Or Threatening Marine Waters) 12. CA Depart. of Fish and Wildlife (Waterway)	Table 7-3 Table 7-4 & 7-5 Appendix B, Table MCL-3 Appendix B, Table MCL-3

TABLE 7-1: NOTIFICATION PROCEDURES (Continued)

RESPONSIBLE PERSON	NOTIFICATION MADE	CALL LIST
EHS Manager (Continued)	13. Minerals Management Serv. (OCS Threatened)	Appendix B, Table MCL-3
	14. CA Reg Water Quality Control Board (To Waterway, Canyon Dry Channel)	Appendix B, Table MCL-3
	15. CA Highway Patrol (To Highway)	Appendix B, Table MCL-3
	16. U.S. Fish & Wildlife Service (Endangered Species)	Appendix B, Table MCL-3
	17. National Oceanic and Atmospheric Admin. (Marine Mammals, Channel Islands Marine Sanctuary)	Appendix B, Table MCL-3
	<u>Offsite Effects:</u>	
	18. Ventura County Public Works	Appendix B, Table MCL-3
	19. Ventura County APCD	Appendix B, Table MCL-3
<p>Note: Personnel safety and response considerations always take precedence over notification procedures. Notifications must be followed to completion. If the responsible person is unable to notify a person noted, then the responsible person must make the notification (if any) for that person.</p> <p>*Verbal notification of the public may be necessary if affected. Seneca would rely on public law enforcement agencies for assistance.</p>		

TABLE 7-2: SENECA's INITIAL RESPONSE TEAM

TITLE	POSITION	NAME	LOCATION ¹	TELEPHONE NUMBER
Management	Primary	G. Crissman	Bakersfield	(b) (6)
	Alternate	K. Jones	Bakersfield	
Environmental (EHS) Manager	Primary	T. Alburger	Bakersfield	
Safety	Primary	D. Rogers	Bakersfield	
Operations Supervisor	Primary	C. McDermott	SESPE	(805) 671-5724 Pager (b) (6) Cell 1-480-768-2500 when promoted then (b) (6) (satellite)
Lead Operator		L. Faith	SESPE	(b) (6) Home (805) Pager (b) (6) Cell
Operators		L. Morgan	SESPE	(b) (6) Home (805) 671-5724 Pager (b) (6) Cell
		D. Reese	SESPE	(b) (6)
		K. Pearson	SESPE	
		F. Salazar	SESPE	
24-HR Toll Free	Sespe Office Bakersfield Office	888-595-8595 805-524-1448 661-399-4270	Sespe Fax Bakersfield Fax	805-524-1460 661-399-7706

TABLE 7-3: SENECA's – WEST MANAGEMENT TEAM

POSITION	NAME	TELEPHONE NUMBER
Vice President, West Division	B. Elliott	(661) 391-3545 Office (b) (6) Cell elliottb@srcx.com
Operations Manager (Alternate Qualified Individual)	G. Crissman	(661) 768-4381, ext. 3104 Office (b) (6) Cell Home crissmang@srcx.com
Operations Supervisor (Qualified Individual)	C. McDermott	(805) 524-1448 Office (b) (6) Cell Home mcdermottc@srcx.com
Environmental (EHS) Manager	T. Alburger	(661) 391-3544 Office (b) (6) Cell Home alburgert@srcx.com
Sr. Technical Advisor	K. Jones	(661) 768-4381 ext. 3106 Office (b) (6) Cell Home jonesk@srcx.com
DOT Supervisor	J. Holm	(b) (6) Cell holmj@srcx.com
Accounting Manager	B. Locke	(661) 391-3547 Office lockeb@srcx.com

TABLE 7-4: SENECA's SPILL MANAGEMENT TEAM

POSITION	NAME	LOCATION	TELEPHONE NUMBER
Incident Commander	G. Crissman or K. Jones	Bakersfield	(661) 768-4381, ext. 3104 Office (b) (6) Cell (b) (6) Home
Financial Section Chief	B. Locke	Bakersfield	(661) 391-3547 Office (b) (6) Home
Operations Section Chief	C. McDermott or L. Faith	Sespe	(805) 524-1448 Office (b) (6) Cell (b) (6) Home
Logistics Section Chief	K. Jones	Bakersfield	(661) 768-4381 ext. 3106 Office (b) (6) Cell (b) (6) Home
Planning Section Chief	L. Faith or K. Jones	Sespe	(b) (6) Cell (b) (6) Home
Liaison Officer	T. Alburger	Bakersfield	(661) 391-3544 Office (b) (6) Cell (b) (6) Home
Public Information Officer	R. Boulware	Pittsburgh	(412) 548-2572 Office (b) (6) Cell
	B. Elliott	Bakersfield	(661) 391- 3545 Office (b) (6) Cell
Legal Counsel	B. Elmore	Houston	(713) 654-2662 Office
	C. Trejchel	Pittsburgh	(412) 548-2537 Office
Health & Safety Officer	D. Rogers	Bakersfield	(661) 391-3552 Office) (b) (6) Cell
Accounting Unit Leader	D. Gagliardi	Bakersfield	(661) 391-3546 Office

POSITION	NAME	LOCATION	TELEPHONE NUMBER
Contracting Unit Leader	G. Crissman	Bakersfield	(b) (6) Cell
Claims and Insurance Unit Leader	B. Elmore	Houston	(713) 654-2662 Office
Communications Unit Leader	Allen Hunter	Bakersfield	(661) 391-3541 Office (b) (6) Cell
Services Unit Leader	Local Operator		
Support Unit Leader	Local Operator		
Security Unit Leader	Local Operator		
Documentation Unit Leader	K. Jones	Bakersfield	(b) (6) Cell (b) (6) Home
Situation Status Unit Leader	T. Alburger	Bakersfield	(661) 391-3544 Office (b) (6) Cell (b) (6) Home
Environmental Unit Leader	T. Alburger	Bakersfield	(661) 391-3544 Office (b) (6) Cell (b) (6) Home
Wildlife Unit Leader	T. Alburger	Bakersfield	(661) 391-3544 Office (b) (6) Cell
Technical Specialist Coordinator	K. Jones	Bakersfield	(b) (6) Cell (b) (6) Home
Staging Unit Leader	G. Crissman	Sespe	(b) (6) Cell (b) (6) Home
Waste Disposal Unit Leader	T. Alburger	Bakersfield	(661) 391-3544 Office (b) (6) Cell

TABLE 7-5: SPILL MANAGEMENT TEAM CALL-UP RESPONSIBILITIES

CALLER	PERSONS CALLED
Incident Commander or Qualified Individual	Deputy Incident Commander Safety Officer Legal Advisor Finance Section Chief Liaison Officer Public Information Officer
Deputy Incident Commander	Planning Section Chief Operations Section Chief Logistics Section Chief
Finance Section Chief	Accounting Unit Leader Claims/Insurance Unit Leader Contracting Unit Leader
Logistics Section Chief	Communications Unit Leader Services Unit Leader Support Unit Leader Contractors
Planning Section Chief	Documentation Unit Leader Environmental Unit Leader Situation Status Unit Leader Wildlife Unit Leader
Operations Section Chief	Onshore Cleanup Contractors Offshore Response Contractors Staging Unit Leader Waste Disposal Unit Leader

7.3 ADDITIONAL RESPONSE RESOURCE

If a spill exceeds the capabilities of its primary response contractor Clean Seas, Seneca's Environmental (EHS) Manager immediately will call upon outside resources (e.g., Clean Coastal Waters) as advised by Clean Seas. However, given the nature of the operations, Seneca does not anticipate exceeding the resource capabilities of Clean Seas.

7.4 INFORMATION ON DISCHARGE

Environmental (EHS) Manager with input from the Operations Supervisor, is required to complete the form "Information on Discharge" (Appendix C) to provide accurate oil spill incident information for the initial and follow-up notification to federal, state, and local agencies. Initial notifications will not be delayed, pending collection of all information on the form.

SECTION EIGHT: WASTE STORAGE

8.1 WASTE MANAGEMENT

Information on waste management as required by Subsection 817.02(h) and provided in Section 305 of the Clean Seas Regional Resource Manual includes:

- Disposal options
- Waste minimization and recycling opportunities
- Temporary storage
- Initial treatment
- Characterization of recovered material
- Transportation

8.1.1 Disposal Options

Under California law, material released or discharged to waters of the State is defined as waste. Once the final disposition of a waste has been determined, it may be redefined as a product or material and may no longer be subject to State waste management requirements. Additional discussion regarding disposal options is contained within the Clean Seas Regional Manual and is incorporated by reference here.

8.1.2 Temporary Storage

In order to expedite removal of spilled oil and contaminated material from State waters during an emergency response, temporary storage sites may be erected at appropriate sites. Oil may be stored in Baker tanks, tank trucks, or 55-gallon drums. If suitable containers are not available, oiled waste may be temporarily stored in pits dug into the soil that should be lined with plastic sheeting to prevent oil leakage and soil penetration.

Temporary storage sites may require an emergency permit from the California Coastal Commission. Siting of the temporary facility must be done with the concurrence of the USCG and State OSC, DTSC, the local Regional Water Quality Control Board, and the local health, fire and emergency services departments. If a Unified Command is established, OSPR will facilitate the contact of the state and local agencies through their liaison function. Table 8-1 provides the telephone numbers for the CCC, RWQCB and DSTSC.

TABLE 8-1: TEMPORARY STORAGE PERMITS CONTACTS

AGENCY	TELEPHONE
California Coastal Commission South Central Coast Area Office	(805) 585-1800
Regional Water Quality Control Board Region 4 – Los Angeles and Ventura Counties	(213) 576-6600 (805) 654-2001 (Ventura Co.)
California EPA Dept. of Toxic Substances Control	(916) 323-2514 (916) 322-0504

Table 4-1 in Section 4 details the temporary waste storage capability of Clean Seas.

Seneca Resources Corporation, as the generator, is responsible for maintaining any recovered oil/oil waste. In addition, Seneca has identified approved waste management contractors in Table MCL-4 in Appendix B.

SECTION NINE: WILDLIFE REHABILITATION

9.1 REHABILITATION REQUIREMENTS

Discussion of wildlife rehabilitation as required by Subsection 817.02 (i) is provided in Section 306 of the Clean Seas Regional Resource Manual.

9.2 CONTRACTED SERVICES

Seneca fully supports wildlife rehabilitation and will do what is deemed necessary by the California Oiled Wildlife Care Network in the event of a spill.

The Oiled Wildlife Care Network (OWCN), is a California-wide collective of wildlife care providers and regional facilities interested in working with oil-affected wildlife. In response to the potential risk to California from oil spill events, the *Lempert-Keene-Seastrand Oil Spill Prevention and Response Act* was passed in 1990. This Act required the Administrator of the California Department of Fish and Game (CDFG), Office of Spill Prevention and Response (OSPR) to establish rescue and rehabilitation stations for aquatic birds, sea otters, and other marine mammals. This legislative mandate for addressing the problems of oiled wildlife care was reaffirmed in 1993 with the passage of Senate Bill 775, which allowed OSPR to use the interest accrued from the State's Oil Spill Response Trust Fund to build at least six major centers to care for oiled wildlife, and was further refined by the legislature in 1995 (Assembly Bill 1549) and 1996 (Assembly Bill 748).

The mission of this legislatively mandated program is to strive to ensure that wildlife exposed to petroleum products in the environment receive the best achievable treatment by providing access to professionally trained personnel and permanent wildlife rehabilitation facilities that are maintained in a state of readiness for oil spill response.

During oil spill response, the OWCN is directly responsible to OSPR operating within the Unified Command. As a trustee agency for wildlife in California, CDFG and its allied groups within the OWCN are mandated to care for all affected wildlife by responding as quickly as possible to provide the best possible treatment to the State's trustee wildlife resources impacted by the oil and to allay public concerns.

In most cases (depending on the location and size of the spill), an OWCN Response Veterinarian will be the first OWCN representative on the scene. The veterinarian will quickly evaluate the wildlife situation, contact the OWCN administration, and the necessary personnel and equipment will be dispatched to the spill site. Most often, the OWCN facility nearest to the spill will be informed/activated and volunteers alerted. All personnel resources involved will be approved by and accounted for through the Unified Command.

In addition and in most cases, International Bird Rescue Research Center (IBRRC) and other local rehabilitation organizations will be notified and their employees will assist with aquatic bird capture, care, and rehabilitation, as necessary. If marine mammals are involved, members of the California Marine Mammal Stranding Network will provide assistance. If necessary, additional OWCN/OSPR mobile equipment will be dispatched so veterinarians and staff can more readily capture and care for wildlife prior to being transported to the OWCN facility.

SECTION TEN: TRAINING AND DRILLS

10.1 OVERVIEW

Seneca maintains programs for oil spill response training and drills that are designed to comply with all applicable laws, regulations, and guidelines including:

- 14 CCR 818.02 California Office of Oil Spill Prevention and Response, Facility Contingency Plans.
- 29 CFR 1910.120 Occupational Safety and Health Administration, Hazardous Waste Operations and Emergency Response.

The emergency response training program is designed to ensure an adequate number of personnel are available to respond to an incident on an around-the-clock basis.

This program includes the following features:

- Identifies training provided to each individual with job responsibilities under the plan.
- Ensures that all response personnel are trained to meet applicable OSHA standards.
- Identifies the methods of training that volunteers and casual laborers receive during a response.
- Identifies training received by personnel in preventing pollution during operations.
- Provides instruction of personnel on the operation and maintenance of equipment and applicable laws, rules and regulations.
- Identifies site-specific environmental hazards.
- Discusses health and safety issues and the proper use of personal protective equipment to mitigate hazards.
- Reviews first aid and reporting accidents, illnesses, and/or injuries.

The program of spill response drills is designed to test notification procedures, exercise equipment, practice response techniques, and maintain a high level of readiness. These drills also serve to determine whether the response plan will function as intended and/or where modifications need to be made. All drills are evaluated by Seneca management to verify that the exercise was completed, that the exercise met the required objectives, and that the exercise performance demonstrated the effectiveness of the plan.

Key components of the drill program are:

- Drills are conducted to ensure that the plan functions in an emergency.
- Drill frequencies are defined in accordance with regulatory requirements and are designed to exercise either individual components of the plan or the entire response plan (see Table 10-2).
- Seneca is prepared to respond to a drill (announced/unannounced) called by the Administrator of OSPR.
- Seneca can substitute a drill called by another agency for one required by OSPR as long as the drill meets the followed conditions of Subsection 817.02 (j) (9):
 1. The drill tests one or more of the following: the facility's spill management team and spill response organization; deployment of the facility's response equipment; or deployment of other response resources identified in the facility's plan.
 2. The drill is conducted with another state or federal agency and the OSPR has been invited.
 3. Seneca has received prior approval for the drill substitution from the Administrator.
- A drill of contractor's services will fulfill the equipment deployment drill requirement for Seneca's facility that utilizes the contractor's plan to fulfill the response requirements of the Seneca plan.
- Any unannounced drill may be used to satisfy the drill requirements if the following conditions are met:
 1. The drill tests one or more of the following: the facility's spill management team and spill response organization, deployment of the facility's response equipment, or deployment of other response resources identified in the facility's plan.

2. Seneca submits a written request to the OSPR Administrator within 90 days of the drill asking that the drill be considered in substitution for one or more of the required drills. The request must specify the components of the plan that were tested and indicate which of the drill requirements have been satisfied.

Seneca will ensure that the following records of training and drills will be maintained at the facility for at least three years after the training and that they will be made available upon request. The records include:

- Documentation of training received by facility personnel and personnel employed by the oil spill response organization and response resources identified in the plan.
- Documentation of drills for facility personnel and the SMT.
- Documentation of drills of the oil spill response organization and response resources identified in the plan.
- Documentation of drills conducted by the OSPR Administration.

10.2 TRAINING

10.2.1 HAZWOPER Training Requirements (29 CFR 1910.12(q))

The HAZWOPER requirements are based on levels of response recognized by the hazardous materials response industry. The level of training received by persons who would be responders in an oil spill event, including members of the oil spill response organization, is addressed in the following training levels discussion.

OSHA has identified five levels of response, each with increasing levels of required training and expertise. The training criteria for individuals in the spill response organization, as well as Seneca employees who may otherwise be involved with a spill incident, are based on the duties and functions associated with the level of response they may be expected to perform. All response team members have the appropriate level of HAZWOPER training.

Level 1: First Responder Awareness Level

This level describes anyone who is likely to witness or discover a discharge or potential discharge. Although the OSHA standards are intended for employees who are expected to participate in emergency response, any employee at the facility may be the first to have knowledge of a spill or a condition which may cause a spill. Employees who are not assigned to the spill response team would take no further action beyond calling the facility's emergency number.

Level 2: First Responder Operations Level

First responders will be at the operations level and should be individuals who respond to releases or potential releases of hazardous substances for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They should be trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and limiting human and environmental exposure.

Level 3: Hazardous Materials Technicians

Hazardous materials technicians are individuals who will respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release.

Level 4: Hazardous Materials Specialist

Hazardous materials specialists are individuals who will respond with and provide support to hazardous materials technicians. Hazardous materials specialist duties parallel those of the hazardous materials technician; however, their duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with federal, state, local and other government authorities in regards to response activities.

Level 5: On-Scene Incident Commander

The level corresponds to the Incident Commander of the spill response team.

Suggested levels of training for Seneca contractors, volunteer and visiting personnel are indicated in Table 10-1. Types of training include formal HAZWOPER certification (i.e., 4, 8, 24, and 40 hour training), ICS, CPR, and first aid. The Seneca Operations Superintendent must certify that oil spill responders have demonstrated competency in numerous areas as defined by HAZWOPER regulations. Seneca will certify that the Seneca Spill Response Team members assigned to all levels have received the required training or equivalent.

10.2.2: Volunteers And Temporary Help

All persons, including casual laborers and volunteers, who respond to oil spills in any capacity, as deemed appropriate by the Federal OSC, will receive training in compliance with 29 CFR 1910, Subpart L and 29 CFR 1910. 12(q). Typically, such volunteers will be assigned to tasks that have minimal safety risk such as wildlife rehabilitation, beach surveillance, or logistic support. In addition, all responders will be informed of the physical and health hazards of the substances they handle, and the use and location of Material Safety Data Sheets (29 CFR 1210.1200). Oil spill response personnel must have completed a 24-hour and/or 40-hour course meeting OSHA requirements (see Section 10.2.1).

TABLE 10-1: SUGGESTED SPILL RESPONSE TEAM POSITION TRAINING

Position	HAZWOPER LEVEL						CPR Training	First Aid	ICS
	1	2	3	4	5	None			
First Responder		X					X	X	X
Incident Commander					X*		X	X	X
Deputy Incident Commander					X*		X	X	X
Public Information Officer			X**				X		X
Safety Officer					X*		X	X	X
Legal Advisor						X	X		X
Liaison Officer					X*		X	X	X
Operations Section Chief			X*				X	X	X
Staging Unit Leader			X				X	X	X
Waste Disposal Unit Leader			X				X	X	X
Planning Section Chief						X	X		X
Documentation Unit Leader						X	X	X	X
Environmental Unit Leader			X				X	X	X
Wildlife Unit Leader			X				X	X	X
Technical Specialist Coordinator			X					X	X
Logistics Section Chief						X	X		X
Communications Unit Leader						X	X		X
Situation Status Unit Leader			X						X
Support Unit Leader						X			X
Security Unit Leader			X**					X	X
Services Unit Leader						X			X
Finance Section Chief						X	X		X
Accounting Unit Leader						X			X
Claims/Insurance Unit Leader						X			X
Contracting Unit Leader			X						X
Contractors - Equipment Operators			X*					X	
Contractors - Laborers			X*						
Volunteers	X*	X**							
Visitors	X*	X**							
*HAZWOPER Required									
**If exposed to oil									

10.2.3: Safety Training

All facility operations (i.e., both routine and emergency) are managed in a manner that protects the environment and the health and safety of employees, customers, contractors and the public. This is accomplished by:

- Advising each supervisor, and employee of safety, health, and environmental requirements and hold them accountable for their performance.
- Designing and managing operations to minimize environmental and health impacts and provide work places free of recognized safety hazards.
- Complying with all laws and regulations governing safety, health, and environmental protection.
- Recognizing the importance of safety, health, and environmental factors where there is competition with economic factors.
- Providing professional staff to support safety, health, and environmental protection.
- Monitoring, evaluating, and reporting performance in safety, health, and environmental protection.
- Providing training needed to protect human, environmental, and physical resources.
- Participating in programs designed to enhance knowledge and improve technology, laws, and regulations.

Seneca conducts monthly safety meeting in which numerous safety topics are discussed incorporating the use of contractor instructors, videos and slides. Safety and health-related topics can include:

- Injury and Illness prevention.
- Regulatory required training.
- Hazard communication.
- Respiratory protection.
- Hearing conservation.
- Business plans.
- Industrial hygiene.
- Waste Management

EHS Alert Meetings are also called at the Operations Supervisor's request to discuss any onsite accident or injury. The objectives of these meetings are to eliminate or mitigate workplace hazards, minimize job injuries and illnesses, and maximize the safety and health of Seneca employees and contractors.

10.3 DRILLS

Announced and unannounced drills, simulations and/or tabletop exercises will be conducted periodically to further improve response personnel preparedness. A drill involving activation of the Initial Response Team and Spill Management Team is held semi-annually. The drill is:

- Based on hypothetical scenarios.
- Covers activities that are likely to occur during the first 72 hours of response operations.
- Lasts one day.

Seneca will invite the OSPR to participate in the planned drills. After each of these drills, Seneca will provide a critique of the drill to the OSPR. A summary of the drill procedures and their frequency of occurrence are provided in Table 10-2.

TABLE 10-2: DRILL PROGRAM

TYPE OF DRILL	FREQUENCY OF OCCURRENCE
Facility Personnel, Qualified Individual, Response Contractors, and the Spill Management Notification Drill	4 per year
Facility Equipment Deployment Drill	Not required
Spill Management Team Tabletop Drill	1 per year
Response Teams and Resources Deployment Drill	1 per year
Entire Response Plan Drill	1 per 3 years

10.3.1 Equipment Drills not required by OSPR

Emails from OSPR confirming Seneca is not required to conduct equipment deployment drills. Seneca's spill equipment is limited to disposal boom and pads, please refer to list found in Appendix D, page D-2.

-----Original Message-----

From: Bill Scott [mailto:bscott@OSPR.DFG.CA.GOV]
 Sent: Tuesday, December 01, 2009 3:06 PM
 To: Keith Jones
 Subject: Fwd: Seneca SEDs on 12/8 and 12/30

FYI,

I am forwarding this mail to you from our drill and exercises individual stating that you are not required to conduct the equipment deployment drills. This is based upon the fact that you don't own any permanent type hard booms. Barbara Foster is in agreement with this as well.

Regards.....Bill

William P. Scott
 Oil Spill Prevention Specialist
 Pipeline Response Program
 Department of Fish & Game
 Office of Spill Prevention & Response
 4665 Lampson Ave. #C
 Los Alamitos, CA 90720

Office Phone: 562.598.4093
 Cell Phone: (b) (6)
 Pager: 562.300.0125
 Fax: 562.342.7213

>>> Chris Thixton 12/1/2009 2:12 PM >>>

Bill-

Per our discussion today you informed me that Seneca does not own nor maintain boom at its facilities near Fillmore. The rated OSROs for Seneca are ACTI and Clean Seas. Based on this information it appears that Seneca is not required to perform a SED (Semi-annual equipment Deployment) for this plan. The SEDs scheduled for 12/8 and 12/30 are not required.

I would suggest that Seneca become familiar with the services that their OSROs provide to include booming, diking, and underflow dams.

Per our earlier discussion you will contact Seneca and discuss this with them. We are still scheduled for the table-top drill on 12/9 in Fillmore.

Thanks
 Chris

APPENDIX A: SAFETY AND HEALTH PLAN

A.1 COMPANY POLICY

Seneca's policy is to manage all operations (i.e., both routine and emergency) in a manner that protects the environment and the health and safety of employees, customers, contractors, and the public. To accomplish this, Seneca will:

- Advise each manager, supervisor, and employee of safety, health, and environmental requirements and hold them accountable for their performance.
- Design and manage operations to minimize environmental and health impacts and provide work places free of recognized safety hazards.
- Comply with all laws and regulations governing safety, health, and environmental protection.
- Recognize the importance of safety, health, and environmental factors where there is competition with economic factors.
- Provide professional staff to support safety, health, and environmental protection.
- Monitor, evaluate, and report performance in safety, health, and environmental protection.
- Provide training needed to protect human, environmental, and physical resources.
- Participate in programs designed to enhance knowledge and improve technology, laws, and regulations.

A.2 APPLICABLE REGULATORY REQUIREMENTS

The Occupational Safety and Health Administration (OSHA) have promulgated two sets of regulations that are applicable to oil spill response operations.

They are:

- Hazard communications regulations (29 CFR §1910.1200).
- Hazardous waste operations and emergency response or HAZWOPER regulations (29 CFR §190.120).

The hazards communications regulations require that workers be informed of any hazards associated with the materials that they may come into contact with during the conduct of response operations. Hazardous waste operations and emergency response regulations require the preparation of a site-specific safety and health plan and that workers be properly trained to carry out response operations in a safe and healthful fashion.

A.3 EXISTING PLANS AND PROGRAMS

Seneca has developed safety-and-health-related plans, programs, and policies for its pipeline operations, including:

- Injury and Illness Prevention Program
- Safety and Health Manual
- Regulatory Required Training Program
- Hazard Communication Program
- Hearing Conservation Program
- Drug and Alcohol Awareness Program
- Business Plan

A.4 OBJECTIVES

The safety and health objectives to be pursued during response operations are:

- Maximize personnel protection during all phases of response operations by implementing a comprehensive safety and health program.
- Comply with applicable laws, rules and regulations, standards, and government agency directives.
- Ensure that personnel are thoroughly briefed on workplace chemical and physical hazards, and on Seneca's policies, practices, and procedures to eliminate the hazards or reduce them to an acceptable level.
- Minimize personnel exposure to workplace hazards.

- Minimize job injuries and illnesses.
- Establish a positive working relationship with federal, state, and local safety and health agencies.
- Maximize the safety and health of the public.

A.5 CHAIN OF COMMAND

Overall responsibility for safety and health issues during response operations rests with the Incident Commander. In a minor spill or the initial stages of a sustained response, the Operations Supervisor, in the case of a sustained response, the EHS Manager or Safety Officer is responsible for safety and health matters. These safety-and-health-related activities are:

- Ensure that all response personnel have received the necessary level of training required under the HAZWOPER regulations.
- Ensure that all company safety policies, procedures, and practices, and regulations are known and strictly adhered to during the conduct of response operations.
- Assist in personnel exposure monitoring.
- Prepare Site-Specific Safety and Health Plan.
- Ensure that there is an adequate supply of protective clothing and equipment for all personnel involved in response operations, and that personal protective equipment is properly utilized throughout operations.
- Ensure that all personnel are aware of, and take all appropriate actions to protect themselves from all situations that pose a threat to their safety and health.
- Suspend any activity that poses a threat to personnel safety and health that cannot be avoided or mitigated through the use of protective clothing or the adoption of a safe operating procedure.
- Determine where first aid stations will be located, arrange for qualified staffing at these stations, see that adequate first aid supplies are available, and assure that the locations of first aid stations are clearly posted.
- Maintain regular communications with emergency medical teams and first aid stations.
- If necessary, establish a safety and health awareness training program for contract personnel involved in response operations.

- Issue Safety and Health Bulletins, as appropriate.
- Maintain a record of all job-related injuries, including their cause, nature, and any corrective actions taken.
- Serve as the principal point of contact for OSHA representatives assigned to monitor response operations.
- Ensure that decontamination stations are established and that all personnel are decontaminated before leaving their work stations during breaks and at the end of each shift.

A.5.1 Operations Supervisor Responsibilities

The Operations Supervisor is responsible for giving safety and loss prevention primary consideration with other factors that affect daily decisions. He is responsible for actively supporting safety and loss prevention performance in their areas by the following actions:

- Communicate safe rules and standards to Seneca and contractor employees.
- Create an atmosphere in which safety issues can be proactively discussed and resolved.
- Set examples.
- Provide the tools necessary for a safe working environment.
- Strictly enforce safety rules and standards.
- Award contracts using past safety performance as a criteria.
- Report and investigate incidents, injuries, and potentially serious incidents.
- Conduct routine safety inspections.
- Preplan all work to ensure safe practices are followed.
- Promptly correct unsafe conditions.
- Hold and document regular safety meetings.
- Provide safety training.

A.5.2 Employee Responsibilities

Each employee must have a positive attitude toward injury prevention and safety. The employee should believe that all injuries can be prevented and act accordingly. The employee is responsible for the following actions:

- Perform the job safely, for personal safety, safety of fellow workers, and protection of facilities. This includes the proper use of safety equipment and devices, as well as safe work practices.
- Report every injury, as well as unsafe conditions or practices (including contractors), to his/her supervisor.
- Participate in safety meetings.
- Assist in reporting and investigating incidents, injuries, and potentially serious incidents.
- Review and become familiar with the contents of safety manuals, handbooks, and publications.

A.5.3 Contractor Responsibilities

Contractors will take all necessary precautions for the safety of all persons on the worksite. Contractors shall comply with Seneca safety rules and regulations and applicable federal, state, and local safety laws, rules, and regulations necessary to prevent injury to persons or damage to property. In addition, contractors will:

- Ensure that their employees are trained in Seneca safety rules and practices and in job-specific procedures.
- Perform all work in a safe, workmanlike manner.
- Provide required safety equipment for their employees.
- Report injuries, near misses, and incidents, no matter how slight, (including property damage) **immediately** (within 24 hours) to the Seneca Operations Supervisor or designated alternate.
- Not operate valves or equipment without the Seneca Operations Supervisor's or designated alternate's approval, except in a life-threatening emergency situation.

- Hold a pre-job safety meeting and other safety meetings as needed during the execution of the job.
- Communicate with the Seneca Operations Supervisor or designated alternate before beginning work.

A.6 COORDINATION WITH GOVERNMENT AGENCIES

During the conduct of response operations, the Incident Commander will meet, on a regular basis, with the Federal On-Scene Coordinator and the State On-Scene Coordinator. Safety and health considerations will be one of the issues addressed at these meetings, particularly with regard to matters relating to the incident-specific application of relevant safety and health laws, rules and regulations, policies, practices, and procedures.

The EHS Manager or Safety Officer will coordinate company activities with federal and state government safety and health personnel. These activities may include:

- Identify and characterize physical and chemical hazards at each work site.
- Determine appropriate levels of personal protection equipment based on the results of air monitoring and the continuous assessment of physical and chemical hazards.
- Review site safety plans.
- Evaluate the effectiveness of safety and health policies, practices, and procedures.
- Comply with agency directives.
- Evaluate the ongoing training needs of response personnel.
- Review incident-specific HAZWOPER training programs.
- Investigate safety and health incidents.
- Allocate safety and health resources.

A.7 DEVELOPMENT OF SITE-SPECIFIC SAFETY AND HEALTH PLAN(S)

The EHS Manager or Safety Officer will prepare Site-specific Safety and Health Plan(s) that will be kept on site and address the safety and health hazards of each phase of site operations and include requirements and procedures for worker protection. All site personnel will be required to read the plan and acknowledge that they are aware of and fully understand its contents in accordance with 29 CFR §1910.120. A suggested format to be followed is form ICS 208 Site Safety Plan provided at the end of this appendix.

ICS 208 – Site Safety Plan

Incident:		Prepared By:		at:	HR	
Period:		to		Version Name:		
Applies to Site:						
Products:				(Attach MSDS)		
Site Characterization						
<input type="checkbox"/> Marine vessel <input type="checkbox"/> Pipeline <input type="checkbox"/> Storage facility <input type="checkbox"/> Truck/Rail car <input type="checkbox"/> Other _____						
Water	<input type="checkbox"/> Ocean		<input type="checkbox"/> Bay		<input type="checkbox"/> River	<input type="checkbox"/> Creek
	<input type="checkbox"/> Canal		<input type="checkbox"/> Wetlands		<input type="checkbox"/> Shoreline	
	<input type="checkbox"/> Muddy		<input type="checkbox"/> Sandy		<input type="checkbox"/> Rocky	
Land	<input type="checkbox"/> Mountains		<input type="checkbox"/> Hills		<input type="checkbox"/> Brushland	
	<input type="checkbox"/> Other _____		<input type="checkbox"/> Grassland		<input type="checkbox"/> Forest	
Use	<input type="checkbox"/> Public		<input type="checkbox"/> Government		<input type="checkbox"/> Residential	
	<input type="checkbox"/> Recreational		<input type="checkbox"/> Industrial		<input type="checkbox"/> Farmland	
(See Attachment Site Map)						
Weather	Water Temp _____ °F		Air Temp _____ °F		Wind Speed _____ mph	
	<input type="checkbox"/> Rain		<input type="checkbox"/> Snow		<input type="checkbox"/> Ice	
				<input type="checkbox"/> Fog		<input type="checkbox"/> Wind Dir. _____ (From)
				<input type="checkbox"/> Other _____		
Pathways for Dispersion	<input type="checkbox"/> Air		<input type="checkbox"/> Water		<input type="checkbox"/> Land	
					<input type="checkbox"/> Other _____	
Site Hazards	<input type="checkbox"/> Boat Safety		<input type="checkbox"/> Fire, Explosion, In-Situ Burning		<input type="checkbox"/> Pump Hose	
	<input type="checkbox"/> Chemical Hazards		<input type="checkbox"/> Heat Stress		<input type="checkbox"/> Slips, Trips, and Falls	
	<input type="checkbox"/> Cold Stress		<input type="checkbox"/> Helicopter Operations		<input type="checkbox"/> Steam and Hot Water	
	<input type="checkbox"/> Confined Spaces		<input type="checkbox"/> Lifting		<input type="checkbox"/> Trenching/Excavation	
	<input type="checkbox"/> Drum Handling		<input type="checkbox"/> Motor Vehicles		<input type="checkbox"/> UV Radiation	
	<input type="checkbox"/> Equipment Operations		<input type="checkbox"/> Noise		<input type="checkbox"/> Visibility	
	<input type="checkbox"/> Electrical Operations		<input type="checkbox"/> Overhead/Buried Utilities		<input type="checkbox"/> Weather	
	<input type="checkbox"/> Fatigue		<input type="checkbox"/> Plants/Wildlife		<input type="checkbox"/> Work Near Water	
	<input type="checkbox"/> Other: _____		<input type="checkbox"/> Other: _____		<input type="checkbox"/> Other: _____	
	(See Attachment – Site Hazards for more information)					
Air Monitoring	%LEL _____		%O2 _____		PPM Benzene _____	
					PPM H2S _____	
				Other (specify) _____		
See Attachment – Monitoring Results/Methods						
Control Measures						
Engineering Controls	<input type="checkbox"/> Source of release secured		<input type="checkbox"/> Valve(s) closed		<input type="checkbox"/> Facility shut down	
	<input type="checkbox"/> Site secured		<input type="checkbox"/> Energy sources locked/tagged out		<input type="checkbox"/> Other	
Personal Protective Equipment (PPE)	<input type="checkbox"/> PVC suits		<input type="checkbox"/> PE/TYVEK suits		<input type="checkbox"/> Respirator _____	
	<input type="checkbox"/> Nitrile gloves		<input type="checkbox"/> PVC gloves		<input type="checkbox"/> Eye protection _____	
	<input type="checkbox"/> Rubber boots		<input type="checkbox"/> Hard hats		<input type="checkbox"/> Other _____	
(See Attachment – PPE)						
Additional Control Measures	<input type="checkbox"/> Decontamination		<input type="checkbox"/> Stations established			(See Site Map and Attachment-Decontamination)
	<input type="checkbox"/> Sanitation		<input type="checkbox"/> Facilities provided – OSHA CFR 1910.120(n).			
	<input type="checkbox"/> Illumination		<input type="checkbox"/> Facilities provided – OSHA CFR 1910.120(m).			
	<input type="checkbox"/> Medical Surveillance		<input type="checkbox"/> Provided – OSHA CFR 1910.120(f).			
ICS 208 Site Safety Plan						

APPENDIX B: LIST OF CONTACTS

Call lists are provided in the following tables.

- Table MCL-1: Seneca Personnel and Facilities
- Table MCL-2: Response Cooperatives/Contractors
- Table MCL-3: Regulatory Agencies
- Table MCL-4: Outside Services
- Table MCL 5: Neighboring Companies

These call lists are updated every six months.

MASTER EMERGENCY CALL LIST

TABLE MCL-1: SENECA PERSONNEL AND FACILITIES

PERSON	HOME	OFFICE	CELL	PAGER
	(b) (6)		(b) (6)	
G. Crissman		(661) 768-4381		
C. McDermott		(805) 524-1448		(805) 671-5773
L. Morgan		(805) 524-1448		(805) 671-5724
D. Reese		(805) 524-1448		
K. Pearson		(805) 524-1448		
F. Salazar		(805) 524-1448		
L. Faith		(805) 524-1448		
E. Morales				
L. Andrade				
R. Lovelace				
R. Culver				
J. Figueroa				
N. Taminich				
Tim Alburger				
Keith Jones				

TABLE MCL-1 (con't.): SENECA PERSONNEL AND FACILITIES

FACILITY	OFFICE
24-HR toll free	888-595-8595
Sespe Office	(805) 524-1448 (805) 524-1460 (fax)
Bakersfield Office	(661) 399-4270 (661) 399-7706 (fax)

LOCATION	SATELLITE PHONE
Sespe or C. McDermott	(b) (6)

TABLE MCL-2: RESPONSE COOPERATIVES/CONTRACTORS

COMPANY	CONTACT	TELEPHONE NO.
Clean Seas 990 Cindy Lane, Unit B Carpentaria, CA 93013-2900	"Ike" Ikerd	(805) 684-3838 (24-hours) (805) 684-2650 (Office Fax) (805) 684-4719 (Yard) (805) 684-0484 (Yard Fax) (b) (6) (Cell)
Patriot Environmental Santa Clarita	Mark Miller Dave Mosley	(800) 624-9136 (24-hours) (b) (6) (cell) (b) (6) (cell)
Double Barrel Environmental Bakersfield	Ron Mikuls	(877) 324-9628 (24-hours) (661) 587-5000 (office)
KLS Handyman Fillmore, CA 93016	Linda Stafford	(805) 524-3216 (office) (b) (6) (Linda cell)
Transportation Specialties Fillmore, CA 93016	Mitch Fox	(805) 525-1348 (office) (b) (6) (Mitch cell) (b) (6) (Peggy cell)
West Coast Welding (WCW) Oxnard, CA 93030	Mike Barbey Larry Burns	(805) 604-1222 (office) (b) (6) (Mike's cell) (b) (6) (cell)
PTS Ventura, CA 93002	Darren Beaman	(805) 652-0213 (office) (b) (6) (cell)

TABLE MCL-3: REGULATORY AGENCIES

JURISDICTION	AGENCY	TELEPHONE NO.
FEDERAL	National Response Center Washington, D.C.	(800) 424-8802 (24-hour)
	U.S. Coast Guard, 11th District Marine Safety Detachment 111 Harbor Boulevard Santa Barbara, CA 93101	(805) 962-7430
	Channel Islands Harbor Station 4201 S. Victoria Avenue Oxnard, CA 93030	(805) 985-9822
	U.S. Coast Guard Pacific Strike Team Hangar 2, Bldg. 390 Hamilton Field Novato, CA 94949-5082	(415) 883-3311 (b) (6) Cell/After Hours
	Department of Transportation Office of Pipeline Safety 1200 New Jersey Ave. Washington, D.C. 20590	(202) 366-4595
	Environmental Protection Agency 75 Hawthorne Street San Francisco, CA 94105 www.epa.gov EPA Region 9 Spill Line	(866) 372-9378 (800) 300-2193, option 3 for Duty Officer
	National Response Center US Coast Guard 2100 Second St. SW Washington, DC 20593 www.nrc.uscg.mil	(800) 424-8802 (24-hour)
	OWCN or wildlife care Dr. Michael Ziccardi Program Director, OWCN Wildlife Health Center University of California Davis, CA 95616	24-HR: 877-823-6926 Office: (530) 754-5701 Pager: (530) 792-7803 Cell: (b) (6) Dr. Greg Massey Cell: (b) (6) Pager: (916) 556-7509
	Bureau of Land Management 3801 Pegasus Drive Bakersfield, CA 93308	(661) 391-6130
	Flight Service Station (Weather) Riverside/LA/Hawthorne/Bakersfield	(800) 992-7433

TABLE MCL-3: REGULATORY AGENCIES (Cont.)

JURISDICTION	AGENCY	TELEPHONE NO.
FEDERAL (cont'd)	National Marine Fisheries Service Joe Codero Marine Mammals 501 W. Ocean Blvd., Suite 4200 Long Beach, CA 90802-4213	(562) 980-4017
	<p>National Oceanic & Atmospheric Admin. (NOAA) Regional Office Channel Is. Natl. Marine Sanctuary 113 Harbor Way Santa Barbara, CA 93109</p> <p>Hazmat Line</p> <p>Scientific Support Coordinator Jordan Stout – NOAA Hazmat Coordinator Coast Guard Island Building 50-7 Alameda, CA 94501</p> <p>Jordon coordinates:</p> <ul style="list-style-type: none"> • Physical Scientist Channel Islands Marine Sanctuary Ben Waitenberger • Injury Assessment Coordinator John Cubit 501 West Ocean blvd., Suite 4470 Long Beach, CA 90802 • Trajectory Analysis Glenn Watabawashi 7600 Sandpoint Way NE NORR Seattle, WA 98115 	<p>(805) 966-7107 (b) (6) Oil spill emergency cell number.</p> <p>(206) 526-4911 (24 hour)</p> <p>(510) 437-5344 (Office) (510) 437-3247 (Fax) (b) (6) (Cell)</p> <p>(b) (6)</p> <p>(562) 980-4000 (b) (6) (cell, John) (810) 810-4949 (oil spill emer.)</p> <p>(206) 526-4911 (Spill Emergency) (206-526-6317 (Office – not an emergency) (206) 526-6329 (Fax)</p>
	National Weather Service Oxnard	(805) 988-6610 Public line open 9:30-3PM for questions. (805) 988-6620 Unlisted 24 hour line for Aviation, Marine, and Oil companies.
	U.S. Fish and Wildlife Service Endangered Species Recovery 2493 Portola Rd. Suite B Ventura, CA 93003	(805) 644-1766

TABLE MCL-3: REGULATORY AGENCIES (Cont.)

JURISDICTION	AGENCY	TELEPHONE NO.
FEDERAL (cont'd)	U.S. Fish and Wildlife Service OCS Coordinator Federal Bldg., 2177 Salk Ave., Suite 250 Carlsbad, CA 92008	(760) 431-9440
STATE	California Emergency Management Agency (OES) 3650 Schriever Ave. Mather, CA 95655	(800) 852-7550 (24-hour) (916) 845-8510 (office)
	California Coastal Commission 45 Fremont Street, Suite 2000 San Francisco, CA 94105-2219	(415) 904-5240 (office) (415) 904-5400 (fax)
	Joint CCC/BCDC Oil Spill Program	(415) 904-5250 (office) (415) 904-5400 (fax)
	Cal-EPA Dept. of Toxic Substance Control 5796 Corporate Ave. Cypress, CA 90630	(800) 698-6942 (Waste alert Report) (714) 484-5300 (714) 484-5302 (fax)
	CalOSHA 6150 Van Nuys Blvd., Suite 405 Van Nuys, CA 91401	(818) 901-5403
	CalTrans 1120 "N" Street, Room 3200 Sacramento, CA 95814	(323) 259-2352 (Ventura Aera oil spill) (916) 653-3442 (24-hour)
	Ventura County Area Permits & Operations District 7 Satellite Office 950 Country Square Drive, Suite 112 Ventura, CA 93003	(805) 650-7179
	Department of Fish and Wildlife 4665 Lampson Ave., Suite C Los Alamitos, CA 90720 www.dfg.ca.gov OSPR Administrator: Tom Cullen 1700 "K" Street, Suite 250 Sacramento, CA 95814	(562) 342-7214 Office (916) 445-9338 Spill Prevention (916) 341-6957 Hot line M-F (916) 358-1300 After hrs. 800-852-7550 800-OILS-911 (800-645-7911)
Division of Oil and Gas Geothermal Resources 1000 S. Hill Road Ste 116 Ventura, CA 93004 5816 Corporate Ave., Suite 200 Cypress, CA 90630	(805) 654-4761 (805) 654-4765 Fax (714) 816-6847	

TABLE MCL-3: REGULATORY AGENCIES (Cont.)

JURISDICTION	AGENCY	TELEPHONE NO.
STATE (cont'd)	Governor's Office (Jerry Brown) State Capitol Building Sacramento, CA 95814	(916) 445-2841
	Governor's Press Secretary	(916) 445-4571
	LEPC (Emergency Planning) Region 1	(562) 795-2900 (562) 795-2877 (fax)
	California Emergency Management Agency (OES)	(916) 845-8911 (24-hr, warning)
	Fire Marshall Pipeline Safety Division 3950 Paramount Blvd. #210 Lakewood, CA 90712 Bob Gorham, Division Chief	(562) 497-9100 (Lakewood) (562) 497-9104 (Fax)
	California Highway Patrol 4656 Valentine Road Ventura, CA	911 (24-hour) (805) 654-4571 (non-emergency)
	State Lands Commission: ARCO Center 200 Oceangate, 12th Floor Long Beach, CA 90802-4331	(562) 590-5201 (24-hour)
	Water Quality Control Board Los Angeles Region 320 W. 4 th , Suite 200 Los Angeles, CA 90013	(213) 576-6600
VENTURA COUNTY	Sheriff/Fire Emergency	911 (24-hour)
	Ambulance/Life Flight Helicopter	(805) 339-4300 (Non-emergency)
	Fire Department: Ventura Area	(805) 389-9710
	Fire Stations	(805) 371-1111
	Sheriff's Department, Ventura County:	(805) 654-2311 (805) 654-9511
	Air Pollution Control District 669 County Square Drive Ventura, CA 93003	(805) 645-1400 (805) 654-2797 (24-hour recorder)
	Permits	(805) 645-1401
	Environmental Health Division 800 S. Victoria Ventura, CA 93009-1730	911 after hours emergencies.
	Hazardous Waste/Prop. 65	(805) 654-2813
	Land Use	(805) 654-2811
	Solid Waste	(805) 654-2813

TABLE MCL-3: REGULATORY AGENCIES (Cont.)

JURISDICTION	AGENCY	TELEPHONE NO.
Ventura County (cont.)	Fire Department	(911 (805) 339-4300 (805) 389-9710 (headquarters)
	Ventura County Water Shed District (flood control) Tammy Butterworth	(805) 654-2001 Prompt #7 (headquarters) (805) 477-1511 (after hrs) #1 (805) 654-2002
	Harbor, Channel Islands	(805) 382-3001 (administration) (805) 382-3000 (emergencies)
	Office of Emergency Services 800 S. Victoria Ventura, CA 93009-1730	911 (Emergency) (805) 654-2551 (Non-emergency)
	Transportation – Road Maintenance County Switchboard	(805) 654-2087 (day) (805) 654-5000 (night)
	Ventura County Parks Pam Gallo, Park Operations Supervisor 800 South Victoria Avenue Ventura, CA 93009 Oil Piers Beach: 1 mile southeast of Mussel Shoals. Rincon Parkway Campground: Old PCH between Hobson County Park and Emma Wood State Beach Faria to Hobson Beaches: Old PCH, south of Pitas Point Emma Wood State Beach: Old PCH at Highway 101 in Ventura	(805) 654-3934
	Planning Division - Oil Enforcement 800 S. Victoria Ave., Denise Susie Ventura, CA 93009-1740 Nancy Francis Scott Ellison	(805) 654-2805 (805) 654-2461 (805) 654-2495
	Public Works- Watershed Protection District Karen Martia 800 S. Victoria Ventura, CA 93009-1730	(805) 662-6882 (805) 339-4399 (after-hour emergencies, Ventura sheriff)
	CITIES	
Ventura	Police Department	(805) 650-8010
	Fire Department Chief Michael Lavery	(805) 339-4310
	Public Relations/Emergencies Ginny Buckingham, Community Development Dept.	(805) 658-4729

TABLE MCL-3: REGULATORY AGENCIES (Cont.)

JURISDICTION	AGENCY	TELEPHONE NO.
CITIES (Cont'd)	<p>Parks/Beaches: Cy Navarro, Park Supervisor/Special Ops City of Ventura Public Works P. O. Box 99 Ventura, CA 93002</p> <p>Seaside Wilderness Park "Hobo Jungle": south of Emma Wood State Beach</p>	(805) 652-4557
	<p>Surfer's Point Park: south of Highway 101 between Ventura Ave & Ventura River Marina Park: Pierpont Blvd. & Greenock Lane Marina Cove: Off Spinnaker Drive</p>	(805) 652-4557
	<p>Channel Islands Community Services District Bill Higgins, General Manager 353 Santa Monica Drive Channel Islands, CA 93035-8595</p> <p>Hollywood Beach: along Ocean Drive between Channel Islands Blvd. & San Miguel Ave</p> <p>Silver Strand Beach: along Ocean Avenue between San Nicholas Ave & Sawtelle Ave</p>	(805) 385-8084
Oxnard	<p>City of Oxnard Waste Reduction Program Community Development Patricia Ruby 300 Marquita 1060 Pacific Avenue Oxnard, CA 93030</p> <p>Parks/Beaches</p> <p>Mandalay County Park, 5th Street & Mandalay Beach Road.</p> <p>Oxnard Shores along Mandalay Beach Rd.</p> <p>Oxnard State Beach west of Harbor Blvd. between Beach Way & Falkirk Ave</p> <p>Ormund Beach foot of Perkins Road, south of Port Hueneme</p>	(805) 385-7407
Santa Paula	Police	(805) 933-4231
Fillmore	<p>Fire Department Fire Station / Public works 524 Sespe Avenue Fillmore, CA</p>	(805) 524-1500

TABLE MCL-3: REGULATORY AGENCIES (Cont.)

JURISDICTION	AGENCY	TELEPHONE NO.
CITIES <i>(Cont'd)</i> FILLMORE	Police Department 524 Sespe Avenue Fillmore, CA	911 (805) 524-2233 (Dispatch) (805) 524-0586
	City Hall 250 Central Ave Fillmore, CA 93015	(805) 524-3701

TABLE MCL-4: OUTSIDE SERVICES

SERVICE	COMPANY	TELEPHONE NO.
Air Transport (Emergency)	Life Flight Helicopter Fillmore Area	911
Ambulance	Ventura/Fillmore	911
Analytical Services	Capco Analytical Services, INC (CAS) 1536 Eastman Avenue, Suite B Ventura, CA 93003	(805) 644-1095
Auto Rental	Avis Rent A Car	(800) 831-2847
	Budget Rent A Car	(800) 527-0700
	Hertz Rent A Car	(800) 654-3131
	Enterprise Rent A Car	(800) 325-8007
	Thrifty Car Rental	(800) 367-2277
Aviation	Aspen Helicopters 2899 W. Fifth St. Oxnard, CA 93030 Contact: C. McLaughlin	(805) 985-5416
	CP Aviation 830 E. Santa Maria Santa Paula Airport	(805) 525-2138
	Kern Charter Bakersfield, CA Weekly patrols, winged aircraft only	(661) 834-6870 (661) 577-2047 Shane Ellis (661) 577-2025 Becky
Backhoe	M.G. Taylor Equipment, Inc. 805 Fifth St. Fillmore, CA 93015	(805) 524-3229 (805) 524-5044 fax
Bus Rental	American International Transportation Barnes Charters, Inc. Donahue Idealease all in Ventura, CA	(805) 643-5466 (805) 658-1861 (805) 644-3000
Consultants: Environmental	Goldberg Environmental Services 2922 Paseo Tranquillo Santa Barbara, CA 93105 Contact: N. Goldberg	(805) 687-6046 (805) 687-1068 (fax)
Corexit 9527	Clean Seas Carpinteria, CA Contact: Rick Gill	(805) 684-3838 (oil spill) (805) 684-4719
	Exxon Chemical Company 13501 Katy Fwy Houston, TX 77079 Contact: Corexit	(281) 870-6000
Hospital	Community Memorial Hospital 147 N. Brent Ventura, CA 93003	(805) 652-5011 Main line (805) 652-5051 Emergency
	St. John's Regional Medical Center 1600 N. Rose Oxnard, CA 93030	(805) 988-2500

TABLE MCL-4: OUTSIDE SERVICES (cont'd)

SERVICE	COMPANY	TELEPHONE NO.
Hospital	Santa Barbara Cottage Hospital Pueblo at Bath Santa Barbara, CA 93105	(805) 682-7111
	Santa Paula Hospital 825 N. 10 th Street Santa Paula, CA	(805) 933-8600 Main Switch Board (805) 933-8630 Emergency
	Ventura County Medical Center 3291 Loma Vista Road Ventura, CA	(805) 652-6000 Press 1 for emergency
Housing	Crown Plaza Beach Hotel 450 E. Harbor Blvd. Ventura, CA	(805) 648-7731
	Ocean Gateway Inn 350 S. Peck Road Santa Paula, CA 93060	(805) 525-1561
	Pierpont Inn 550 Sanjon Road Ventura, CA	(805) 653-6144
	Ventura Beach Marriott 2055 E. Harbor Blvd. Ventura, CA	(805) 643-6000 (800) 228-9290
Media	Ventura Star Free Press 5250 Ralston Ventura, CA	(805) 437-0000
	Lazer Broadcasting KOXR 910 (Spanish Radio) 200 South "A" St. Oxnard, CA 93030	(805) 487-0444 (805) 240-2070
	Cumulus Media KVEN 1450 (News/Talk Radio) 1376 Walter St. Ventura, CA 93003	(805) 642-8595
	KEYT Television Station 500 E. Esplanade Dr. Oxnard, CA 93030 Main office: 730 Miramonte Dr. Santa Barbara, Ca 93109	(805) 485-7545 News office Ext. 106
	KBEH-TV 950 Flynn Camarillo, CA	(805) 388-0081
Operations	Advanced Cleanup Technologies 4548 Wesley Lane Bakersfield, CA 93008 Bill Cox	(661) 392-7765) (661) 392-7762 (fax) (b) (6) (cellular)
	B.J. Services 11927 Greenstone Ave. Santa Fe Springs, CA 90670	(562) 903-7888

TABLE MCL-4: OUTSIDE SERVICES (cont'd)

SERVICE	COMPANY	TELEPHONE NO.
Operations	California Conservation Corps 2714 E. Vineyard Ave.. Oxnard, CA 1719 24 th Street Sacramento, CA 95814 Contact: P. Penn	(805) 278-2787 (916) 341-3224
	C.D. Lyon Construction, Inc. PO Box 1456 Ventura, CA 93002-1456	(805) 653-0173 (805) 653-0175 (b) (6) (L. Elshere's cell!)
	Granite Construction Co. 999 Mission Rock Rd. Santa Paula, CA 93060	(805) 933-3388
	Halliburton Energy Services 5651 Perkins Rd. Oxnard, CA 93033	(805) 487-9838
	Irwin Industries, Inc 5901 Edison Dr. Oxnard, CA 93033	(805) 648-1700 (800) 548-3838
	L3 Communications MariPro 1522 Cook Place Goleta, CA 93117	(805) 683-3881
	National Oilwell Supply 115 N. Olive Street Ventura, CA 93001	(805) 653-6666
	Oilfield Electric 1801 N. Ventura Ave. Ventura, CA 93001	(805) 648-3131
	OST Trucking 2951 N. Ventura Ave. Ventura, CA 93001	(805) 643-9963
	Pacific Construction & Maintenance 1350 E. Santa Paula Santa Paula, CA 93060	(805) 525-2144 (24-hour)
	Port Hueneme Marine 700A E. Hueneme Rd. Port Hueneme, CA 93041	(805) 488-0988
	San Pedro Harbor Ship Supply 426 W. 4 th St. San Pedro, CA 90731	(310) 547-1181
	Santa Paula Equipment Rental 614 E. Harvard Blvd. Santa Paula, CA 93060	(805) 525 3217
	Speeds Oil Tool Service 1573 E. Betteravia Rd. Santa Maria, CA 93454	(805) 925-4510

TABLE MCL-4: OUTSIDE SERVICES (cont'd)

SERVICE	COMPANY	TELEPHONE NO.
Operations	T & T 1375 North Olive Street Ventura, CA 93001	(805) 648-3348
	Thrasher Farms	(805) 525-0583
	Tidewater Marine Western 640 W. Hueneme Rd. Oxnard, CA 93033	(805) 271-1313 (24-hour)
	Rain for Rent 333 South 12th St. Santa Paula, CA 93060	(805) 525-3306
Portable Toilets	J.W. Enterprises 1689 Morse Ave. Ventura, CA 93001	(800-) 350-3331 (805) 658-2449
	United Site Services 411 S. Beckwith Santa Paula, CA 93060	(800) 638-1233 (805) 933-2791
Security	Dial Security 760 W. Ventura Blvd., Camarillo, CA	(805) 389-6700
	Gold Coast Security 4848 Colt, Suite 2 Ventura, CA 93003	(805) 642-8799
Tank Rental	Baker Tanks 1460 E. Santa Paula St. Santa Paula, CA 93061	(805) 525-1710
	OST Trucking 2951 N. Ventura Ave. Ventura, CA 93001	(805) 643-9963
Telecommunication	Alert Communications 2437 Grand Avenue Ventura, CA	(805) 650-4949
Trailer Rental	GE Modular Space 7100 District Blvd. Bakersfield, CA 93313	(800) 523-7918
	Mobile Modular 5700 Las Positas Rd. Livermore, CA 94551	(863) 965-3700
	Williams Scotsman Mobile Offices Santa Fe Springs	(800) 782-1500 (800) 638-6963 Info
Truck Rental	Hertz Penske Truck Rental Goleta, CA Ventura, CA	(805) 967-1541 (805) 642-4443
	Ryder 701 Richmond Oxnard, CA	(805) 483-8241

TABLE MCL-4: OUTSIDE SERVICES (cont'd)

SERVICE	COMPANY	TELEPHONE NO.
Truck Rental	U-Haul	
	• 5720 Hollister Avenue Goleta, CA 93117	(805) 963-5327
	• 437 Main Street Fillmore, CA 93015	(805) 524-4972
	• 1450 E. Santa Paula Street Santa Paula, CA	(805) 525-8236
Utilities	Southern California Gas Company	(800) 427-2200
	Southern California Edison Company	(800) 655-4555
Vacuum Trucks	Ecology Control Industries 2055 N. Ventura Ave. Ventura, CA 93002	(805) 648-5123
	Pacific Construction & Maintenance 1350 E. Santa Paula Santa Paula, CA 93060	(805) 525-2144 (24-hour)
	Transportation Specialties Fillmore, CA 93016	(805) 525-1348 (Office) (b) (6) (Cell)
Visual Communications		
Waste Disposal (Class 1)	Clean Harbors Buttonwillow, LLC 2500 W. Lokern Road Buttonwillow, CA 93206	(661) 762-6200 (661) 762-7681 (Fax)
Waste Recycling	Anterra 1933 E. Wooley Rd. Oxnard, CA 93030	(805) 981-4053
Waste Transport (Solid)	Ventura Rubbish Ventura, CA	(805) 647-1414
Waste Oil Bins/Transport	OST Trucking 2951 N. Ventura Avenue Ventura, CA 93001	(805) 643-9963
Wildlife Care	Santa Barbara Marine Mammal Center 389 N. Hope Ave. Santa Barbara, CA 93105	(805) 687-3255 (24-hour)
	Santa Barbara Wildlife Care Network	(805) 966-9005
	San Luis Obispo Pacific Wildlife Care	(805) 543-9453 (24-hour)
	Ventura County Animal Regulation Dept.	(805) 388-4341

TABLE MCL-5: NEIGHBORING COMPANIES

COMPANY	ADDRESS	TELEPHONE NO.
H. L. Hall & Sons	12060 Baranca Road Camarillo, CA Contact: Paul Conaway 1130 Los Serenos Dr. Fillmore, CA 93015	(b) (6) (office, home) (b) (6) (cell)
Cook Oil Company	Carlos Fillmore, CA 93015	(805) 524-2201 (office) (b) (6) (cell)
T. B. Properties	Box 577 Fillmore, CA 93016 Contact: Warren Thompson	(805) 524-2400 (office) (b) (6) (cell)
Crimson Pipeline	Bakersfield, CA	(866) 351-7473 (24-HR) (661) 616-3191 (control center)
Vintage	Santa Paula, CA	(805) 525-8008 (office) (805) 525-8008 (after hours)
Aera	Ventura, CA	(805) 648-8385 (office) (b) (6) (Jere, cell)

APPENDIX C: FORMS

This appendix includes the following forms:

- Information on Discharge
- Agency Notification Log
- Telephone Log
- Bomb Threat Worksheet
- Accident Report - Hazard Liquid Pipeline

Additional Forms, ICS

- CG IAP Cover Sheet
- ICS 202, Incident Briefing
- ICS 202, Incident Objectives
- ICS 203, Organization Assignment List
- ICS 204, Assignment List
- ICS 204a-CG, Assignment List Attachment
- ICS 205, Communications Plan
- ICS 206, Medical Plan
- ICS 208, Site Safety Plan

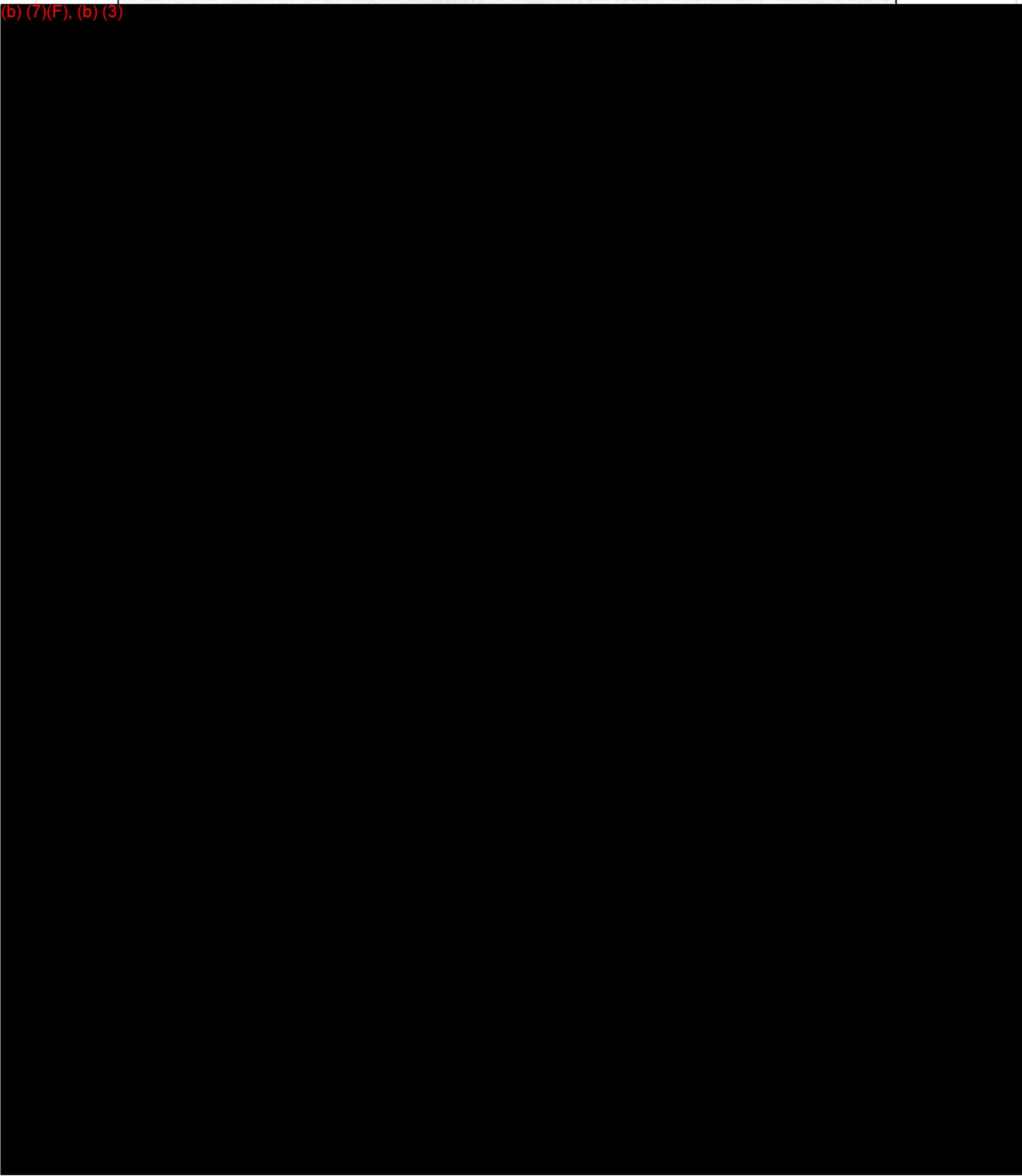
INFORMATION ON DISCHARGE			
(it is not necessary to wait for all information before calling NRC and CA OES)			
INVOLVED PARTIES			
Reporting Party			
Name		Phone Number	
Company			
Address			
City		State	ZIP
CALLING FOR RESPONSIBLE PARTY? <input type="checkbox"/> YES <input type="checkbox"/> NO			
Suspected Responsible Party			
Name		Phone Number	
Company			
Address			
City		State	ZIP
ORGANIZATION TYPE: <input type="checkbox"/> Private Citizen <input type="checkbox"/> Private Enterprise <input type="checkbox"/> Public Utility			
<input type="checkbox"/> Local Government <input type="checkbox"/> State Government <input type="checkbox"/> Federal Government			
INCIDENT DESCRIPTION			
Source and/or Cause of Incident			
Date		Time	
Incident Address /Location		Facility Capacity	
Latitude Degrees		Longitude Degrees	
Nearest City		Distance from City	
<input type="checkbox"/> Above Ground Storage Tank <input type="checkbox"/> Pipeline <input type="checkbox"/> Other _____			
Tank Capacity		Township/Range	

INFORMATION ON DISCHARGE		
(it is not necessary to wait for all information before calling NRC and CA OES)		
MATERIALS		
Released Quantity	Unit of Measure	
Released Material	Quantity in Water	
Inhalation/Explosive Vapor Hazards?	Size and Appearance of Slick	
WEATHER AND SEA CONDITIONS		
Tide	Wind Speed (knots)	Visibility (miles)
Wave Height	Wind Direction	Ceiling (feet)
Wave Direction	Air Temperature	Precipitation
FACILITY INFORMATION		
Current Condition		
REMEDIAL ACTION		
HAS SOURCE BEEN CONTROLLED? <input type="checkbox"/> YES <input type="checkbox"/> NO		
Actions Taken to Correct or Mitigate Incident		
IMPACT		
Number of Injuries	Number of Fatalities	
Were there evacuations? <input type="checkbox"/> YES <input type="checkbox"/> NO	Number Evacuated	
Was there any damage? <input type="checkbox"/> YES <input type="checkbox"/> NO	Damage In Dollars	
ADDITIONAL INFORMATION		
Any Information About the Incident Not Recorded Elsewhere In the Report?		
CALLER NOTIFICATIONS		
<input type="checkbox"/> EPA <input type="checkbox"/> State <input type="checkbox"/> USCG		
<input type="checkbox"/> Other (specify)		

AGENCY NOTIFICATION LOG				
Name of person making calls: _____				
Agency Notified	Person Contacted	Business Discussed	Date	Time
National Response Center (800) 424-8802				
California Emergency Management Agency (OES) (800) 852-7550				
California Department of Fish & Wildlife 800-852-7550 800-645-7911				
California Division of Oil, Gas & Geothermal Resources (805) 654-4761				
Environmental Protection Agency (415) 744-2000				
Regional Water Quality Control Board (213) 576-6600 For oil spill call OES				
U.S. Coast Guard Santa Barbara (805) 962-7430				
Ventura County Env. Health Division (805) 654-2813				
Ventura County Office of Emergency Services (805) 654-2551				

BOMB THREAT WORKSHEET

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



ACCIDENT REPORT - HAZARDOUS LIQUID PIPELINE		
OPERATOR INFORMATION		
1) Name of operator _____	Report Date _____	
2) Principal business address _____		
3) Is pipeline Interstate? <input type="checkbox"/> Yes <input type="checkbox"/> No		
TIME AND LOCATION OF ACCIDENT		
1) Date (month/day/year) _____		
2) Hour (24 hour clock) _____		
3) If onshore give city, state and county _____		
4) If offshore, give offshore coordinates _____		
5) Did accident occur on Federal land? (See Instructions for Federal land) _____		
6) Specific location (If location is near offshore platforms, or landmarks such as highways, waterways, or railroads, attach a sketch or drawing showing relationship of accident location to these landmarks.) _____ _____		
ORIGIN OF RELEASE OF LIQUID OR VAPOR		
1) Part of system involved _____	<input type="checkbox"/> line pipe <input type="checkbox"/> tank farm <input type="checkbox"/> pump station	
2) Item involved _____	<input type="checkbox"/> pipe <input type="checkbox"/> welded fitting <input type="checkbox"/> scraper trap <input type="checkbox"/> pump <input type="checkbox"/> girth weld <input type="checkbox"/> tank <input type="checkbox"/> valve <input type="checkbox"/> bolted fitting <input type="checkbox"/> longitudinal weld	
<input type="checkbox"/> Other (specify) _____		
3) Year item installed _____		
CAUSE OF ACCIDENT		
<input type="checkbox"/> corrosion	<input type="checkbox"/> failed weld	<input type="checkbox"/> incorrect operations by personnel
<input type="checkbox"/> failed pipe	<input type="checkbox"/> outside force damage	<input type="checkbox"/> malfunction of equipment
<input type="checkbox"/> Other (specify) _____		
INJURY OR DEATH		
1) Number of persons injured _____	Operator employees _____	Non-employees _____
2) Number of persons killed _____	Operator employees _____	Non-employees _____
COMMODITY SPILLED		
1) Name of commodity spilled _____		
2) Classification of commodity _____		
<input type="checkbox"/> petroleum <input type="checkbox"/> petroleum product <input type="checkbox"/> HVL <input type="checkbox"/> Non-HVL		
3) Estimated amount of commodity involved _____ Barrels spilled _____ Barrels recovered _____		
4) Was there an explosion? <input type="checkbox"/> Yes <input type="checkbox"/> No		
5) Was there a fire? <input type="checkbox"/> Yes <input type="checkbox"/> No		

1. Incident Name	2. Operational Period to be covered by IAP (Date/Time) From: _____ To: _____	CG IAP COVER SHEET
------------------	---	-------------------------------

3. Approved by Incident Commander(s):

<u>ORG</u>	<u>NAME</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

INCIDENT ACTION PLAN

The items checked below are included in this Incident Action Plan:

- ICS 202-CG (Response Objectives) _____
- ICS 203-CG (Organization List) – OR – ICS 207-CG (Organization Chart) _____
- ICS 204-CGs (Assignment Lists)
One Copy each of any ICS 204-CG attachments:

- ICS 205-CG (Communications Plan) _____
- ICS 206-CG (Medical Plan)
- ICS 208-CG (Site Safety Plan) or Note SSP Location _____
- Map/Chart
- Weather forecast / Tides/Currents

Other Attachments

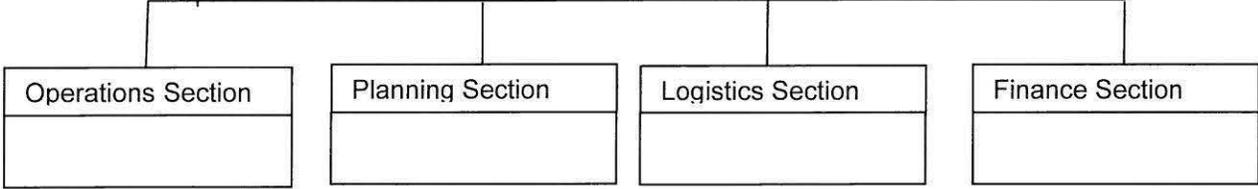
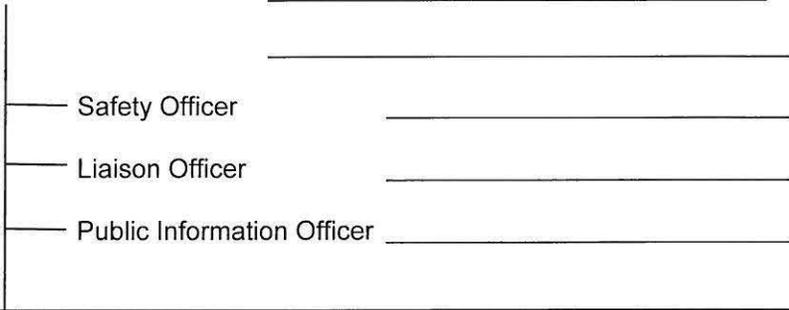
- _____
- _____
- _____
- _____
- _____
- _____
- _____
- _____
- _____
- _____

4. Prepared by:	Date/Time
-----------------	-----------

1. Incident Name	2. Prepared by: (name) Date: _____ Time: _____	INCIDENT BRIEFING ICS 201-CG
3. Map/Sketch (include sketch, showing the total area of operations, the incident site/area, overflight results, trajectories, impacted shorelines, or other graphics depicting situational and response status)		
4. Current Situation: _____ _____ _____ _____ _____ _____ _____ _____ _____		

1. Incident Name	2. Prepared by: (name) Date: _____ Time: _____	INCIDENT BRIEFING ICS 201-CG
------------------	---	---------------------------------

6. Current Organization (fill in additional appropriate organization)



1. Incident Name	2. Operational Period (Date/Time) From: _____ To: _____	INCIDENT OBJECTIVES ICS 202-CG
3. Objective(s)		
4. Operational Period Command Emphasis (Safety Message, Priorities, Key Decisions/Directions)		
Approved Site Safety Plan Located at: 5. Prepared by: (Planning Section Chief) _____ Date/Time _____		

INCIDENT OBJECTIVES (ICS 202-CG)

Purpose. The Incident Objectives form describes the basic incident strategy, control objectives, command emphasis/priorities, and safety considerations for use during the next operational period.

Preparation. The Incident Objectives form is completed by the Planning Section following each Command and General Staff Meeting conducted in preparing the Incident Action Plan.

Distribution. The Incident Objectives form will be reproduced with the IAP and given to all supervisory personnel at the Section, Branch, Division/Group, and Unit levels. All completed original forms **MUST** be given to the Documentation Unit.

<u>Item #</u>	<u>Item Title</u>	<u>Instructions</u>
1.	Incident Name	Enter the name assigned to the incident.
2.	Operational Period	Enter the time interval for which the form applies. Record the start and end date and time.
3.	Objective(s)	Enter clear, concise statements of the objectives for managing the response. These objectives are for the incident response for this operational period and for the duration of the incident. Include alternatives.
4.	Operational Period Command Emphasis	Enter clear, concise statements for safety message, priorities, and key command emphasis/decisions/directions. Enter information such as known safety hazards and specific precautions to be observed during this operational period. If available, a safety message should be referenced and attached. At the bottom of this box, enter the location where approved Site Safety Plan is available for review.
5.	Site Safety Plan Prepared By Date/Time	Note location of the approved Site Safety Plan. Enter the name of the Planning Section Chief completing the form. Enter date (month, day, year) and time prepared (24-hour clock).

NOTE: ICS 202-CG, Incident Objectives, serves as part of the Incident Action Plan (IAP)

ORGANIZATION ASSIGNMENT LIST (ICS 203-CG)

Purpose. The Organization Assignment List provides ICS personnel with information on the units that are currently activated and the names of personnel staffing each position/unit. It is used to complete the Incident Organization Chart (ICS form 207-CG) which is posted on the Incident Command Post display. An actual organization will be event-specific. **Not all positions need to be filled.** The size of the organization is dependent on the magnitude of the incident and can be expanded or contracted as necessary.

Preparation. The Resources Unit prepares and maintains this list under the direction of the Planning Section Chief.

Distribution. The Organization Assignment List is duplicated and attached to the Incident Objectives form (ICS 202-CG) and given to all recipients of the Incident Action Plan. All completed original forms **MUST** be given to the Documentation Unit.

<u>Item #</u>	<u>Item Title</u>	<u>Instructions</u>
1.	Incident Name	Enter the name assigned to the incident.
2.	Operational Period	Enter the time interval for which the form applies. Record the start and end date and time.
3.	Incident Commander and Staff	Enter the names of the Incident Commander and Staff. Use at least the first initial and last name.
4.	Agency Representative	Enter the agency names and the names of their representatives. Use at least the first initial and last name.
5. thru 8.	Section	Enter the name of personnel staffing each of the listed positions. Use at least the first initial and last name. For Units, indicate Unit Leader and for Divisions/Groups indicate Division/Group Supervisor. Use an additional page if more than three branches are activated. If there is a shift change during the specified operational period, list both names, separated by a slash.
9.	Prepared By Date/Time	Enter the name and position of the person completing the form Enter date (month, day, year) and time prepared (24-hour clock).

1. Incident Name		2. Operational Period (Date/Time) From: _____ To: _____		Assignment List ICS 204-CG	
3. Branch		4. Division/Group/Staging			
5. Operations Personnel					
Name		Affiliation		Contact # (s)	
Operations Section Chief: _____					
Branch Director: _____					
Division/Group Supervisor/STAM: _____					
6. Resources Assigned "X" indicates 204a attachment with additional instructions					
Strike Team/Task Force/Resource Identifier	Leader	Contact Info. #	# Of Persons	Reporting Info/Notes/Remarks	
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
7. Work Assignments					
8. Special Instructions					
9. Communications (radio and/or phone contact numbers needed for this assignment)					
<u>Name/Function</u>	<u>Radio: Freq./System/Channel</u>	<u>Phone</u>	<u>Cell/Pager</u>	_____	
_____	_____	_____	_____	_____	
_____	_____	_____	_____	_____	
Emergency Communications					
Medical _____	Evacuation _____	Other _____			
10. Prepared by:	Date/Time	11. Reviewed by (PSC):	Date/Time	12. Reviewed by (OSC):	Date/Time

ASSIGNMENT LIST (ICS 204-CG)

Purpose. The Assignment List(s) informs Division and Group supervisors of incident assignments. Once the Unified Command and General Staff agree to the assignments, the assignment information is given to the appropriate Divisions and Groups.

Preparation. The Assignment List is normally prepared by the Resources Unit, using guidance from the Incident Objectives (ICS 202-CG), Operational Planning Worksheet (ICS 215-CG), and the Operations Section Chief. The Assignment List must be approved by the Planning Section Chief and Operations Section Chief. When approved, it is included as part of the Incident Action Plan (IAP). Specific instructions for specific resources may be entered on an ICS 204a-CG for dissemination to the field. A separate sheet is used for each Division or Group. The identification letter of the Division is entered in the form title. Also enter the number (roman numeral) assigned to the Branch.

Special Note. The Assignment List, ICS 204-CG submits assignments at the level of Divisions and Groups. The Assignment List Attachment, ICS 204a-CG shows more specific assignment information, if needed. The need for an ICS 204a-CG is determined by the Planning and Operations Section Chiefs during the Operational Planning Worksheet (ICS 215-CG) development.

Distribution. The Assignment List is duplicated and attached to the Incident Objectives and given to all recipients of the Incident Action Plan. In some cases, assignments may be communicated via radio/telephone/fax. All completed original forms MUST be given to the Documentation Unit.

<u>Item #</u>	<u>Item Title</u>	<u>Instructions</u>
1.	Incident Name	Enter the name assigned to the incident.
2.	Operational Period	Enter the time interval for which the form applies.
3.	Branch	Enter the Branch designator.
4.	Division/Group/Staging	Enter the Division/Group/Staging designator.
5.	Operations Personnel	Enter the name of the Operations Chief, applicable Branch Director, and Division Supervisor.
6.	Resources Assigned	Each line in this field may have a separate Assignment List Attachment (ICS 204a-CG). Enter the following information about the resources assigned to Division or Group for this period:
	Identifier	List identifier
	Leader	Leader name
	Contact Information	Primary means of contacting this person (e.g., radio, phone, pager, etc.). Be sure to include area code when listing a phone number.
	# Of Persons	Total number of personnel for the strike team, task force, or single resource assigned.
	Reporting Info/Notes/Remarks	Special notes or directions, specific to this strike team, task force, or single resource. Enter an "X" check if an Assignment List Attachment (ICS 204a-CG) will be prepared and attached. The Planning and Operations Section Chiefs determine the need for an ICS 204a-CG during the Operational Planning Worksheet (ICS 215-CG) development.
7.	Work Assignment	Provide a statement of the tactical objectives to be achieved within the operational period by personnel assigned to this Division or Group.
8.	Special Instructions	Enter a statement noting any safety problems, specific precautions to be exercised, or other important information.
9.	Communications	Enter specific communications information (including emergency numbers) for this division /group. If radios are being used, enter function (command, tactical, support, etc.), frequency, system, and channel from the Incident Radio Communications Plan (ICS 205-CG). Note: Phone numbers should include area code.
10.	Prepared By	Enter the name of the person completing the form, normally the Resources Unit Leader.
	Date/Time	Enter date (month, day, year) and time prepared (24-hour clock).
11.	Reviewed by (PSC)	
	Date/Time	Enter date (month, day, year) and time prepared (24-hour clock).
12.	Reviewed by (OSC)	Enter the name of the operations person reviewing the form, normally the Operations Section Chief.
	Date/Time	Enter date (month, day, year) and time prepared (24-hour clock).

1. Incident Name		2. Operational Period (Date/Time)		ASSIGNMENT LIST ATTACHMENT	
		From: _____ To: _____		ICS 204a-CG	
3. Branch			4. Division/Group		
5. Strike Team/Task Force/Resource (Identifier)		6. Leader		7. Assignment Location	
8. Work Assignment Special Instructions, Special Equipment/Supplies Needed for Assignment, Special Environmental Considerations, Special Site Specific Safety Considerations					
Approved Site Safety Plan Located at:					
9. Other Attachments (as needed)					
<input type="checkbox"/> Map/Chart		<input type="checkbox"/> Weather Forecast/Tides/Currents		<input type="checkbox"/> _____	
<input type="checkbox"/> _____		<input type="checkbox"/> _____		<input type="checkbox"/> _____	
10. Prepared by:		11. Reviewed by (PSC):		12. Reviewed by (OSC):	
Date/Time		Date/Time		Date/Time	

1. Incident Name		2. Operational Period (Date / Time) From: _____ To: _____			INCIDENT RADIO COMMUNICATIONS PLAN ICS 205-CG	
3. BASIC RADIO CHANNEL USE						
SYSTEM / CACHE	CHANNEL	FUNCTION	FREQUENCY	ASSIGNMENT	REMARKS	
4. Prepared by: (Communications Unit)				Date / Time		
INCIDENT RADIO COMMUNICATIONS PLAN					ICS 205-CG (Rev.07/04)	

ICS 208 – Site Safety Plan

Incident:		Prepared By:		at: HR
Period: _____ to _____		Version Name: _____		
Applies to Site:				
Products:				(Attach MSDS)
Site Characterization				
<input type="checkbox"/> Marine vessel <input type="checkbox"/> Pipeline <input type="checkbox"/> Storage facility <input type="checkbox"/> Truck/Rail car <input type="checkbox"/> Other _____				
Water	<input type="checkbox"/> Ocean	<input type="checkbox"/> Bay	<input type="checkbox"/> River	<input type="checkbox"/> Creek
	<input type="checkbox"/> Canal	<input type="checkbox"/> Wetlands	<input type="checkbox"/> Shoreline	<input type="checkbox"/> Other _____
	<input type="checkbox"/> Muddy	<input type="checkbox"/> Sandy	<input type="checkbox"/> Rocky	
Land	<input type="checkbox"/> Mountains	<input type="checkbox"/> Hills	<input type="checkbox"/> Brushland	<input type="checkbox"/> Forest
	<input type="checkbox"/> Other _____	<input type="checkbox"/> Grassland		
Use	<input type="checkbox"/> Public	<input type="checkbox"/> Government	<input type="checkbox"/> Residential	<input type="checkbox"/> Commercial
	<input type="checkbox"/> Recreational	<input type="checkbox"/> Industrial	<input type="checkbox"/> Farmland	<input type="checkbox"/> Other _____
(See Attachment Site Map)				
Weather	Water Temp _____ °F	Air Temp _____ °F	Wind Speed _____ mph	Wind Dir. _____ (From)
	<input type="checkbox"/> Rain	<input type="checkbox"/> Snow	<input type="checkbox"/> Ice	<input type="checkbox"/> Fog
	<input type="checkbox"/> Other _____			
Pathways for Dispersion	<input type="checkbox"/> Air	<input type="checkbox"/> Water	<input type="checkbox"/> Land	<input type="checkbox"/> Other _____
Site Hazards	<input type="checkbox"/> Boat Safety	<input type="checkbox"/> Fire, Explosion, In-Situ Burning	<input type="checkbox"/> Pump Hose	
	<input type="checkbox"/> Chemical Hazards	<input type="checkbox"/> Heat Stress	<input type="checkbox"/> Slips, Trips, and Falls	
	<input type="checkbox"/> Cold Stress	<input type="checkbox"/> Helicopter Operations	<input type="checkbox"/> Steam and Hot Water	
	<input type="checkbox"/> Confined Spaces	<input type="checkbox"/> Lifting	<input type="checkbox"/> Trenching/Excavation	
	<input type="checkbox"/> Drum Handling	<input type="checkbox"/> Motor Vehicles	<input type="checkbox"/> UV Radiation	
	<input type="checkbox"/> Equipment Operations	<input type="checkbox"/> Noise	<input type="checkbox"/> Visibility	
	<input type="checkbox"/> Electrical Operations	<input type="checkbox"/> Overhead/Buried Utilities	<input type="checkbox"/> Weather	
	<input type="checkbox"/> Fatigue	<input type="checkbox"/> Plants/Wildlife	<input type="checkbox"/> Work Near Water	
	<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____	<input type="checkbox"/> Other: _____	
	(See Attachment – Site Hazards for more information)			
Air Monitoring	%LEL _____	%O2 _____	PPM Benzene _____	PPM H2S _____
	Other (specify) _____			
See Attachment – Monitoring Results/Methods				
Control Measures				
Engineering Controls	<input type="checkbox"/> Source of release secured	<input type="checkbox"/> Valve(s) closed	<input type="checkbox"/> Facility shut down	
	<input type="checkbox"/> Site secured	<input type="checkbox"/> Energy sources locked/tagged out	<input type="checkbox"/> Other _____	
Personal Protective Equipment (PPE)	<input type="checkbox"/> PVC suits	<input type="checkbox"/> PE/TYVEK suits	<input type="checkbox"/> Respirator _____	
	<input type="checkbox"/> Nitrile gloves	<input type="checkbox"/> PVC gloves	<input type="checkbox"/> Eye protection _____	
	<input type="checkbox"/> Rubber boots	<input type="checkbox"/> Hard hats	<input type="checkbox"/> Other _____	
(See Attachment – PPE)				
Additional Control Measures	<input type="checkbox"/> Decontamination	<input type="checkbox"/> Stations established	(See Site Map and Attachment-Decontamination)	
	<input type="checkbox"/> Sanitation	<input type="checkbox"/> Facilities provided – OSHA CFR 1910.120(n).		
	<input type="checkbox"/> Illumination	<input type="checkbox"/> Facilities provided – OSHA CFR 1910.120(m).		
	<input type="checkbox"/> Medical Surveillance	<input type="checkbox"/> Provided – OSHA CFR 1910.120(f).		
ICS 208 Site Safety Plan				

ICS 208 – Site Safety Plan (Continued)

Incident:		Prepared By:	at: HR
Period: to		Version Name:	
Work Plan			
<input type="checkbox"/> Booming	<input type="checkbox"/> Skimming	<input type="checkbox"/> Vacuum trucks	
<input type="checkbox"/> Pumping	<input type="checkbox"/> Excavation	<input type="checkbox"/> Heavy equip.	
<input type="checkbox"/> Sorbent pads	<input type="checkbox"/> Shoring	<input type="checkbox"/> Patching	
<input type="checkbox"/> Hot work	<input type="checkbox"/> Appropriate permits issued	<input type="checkbox"/> Other _____	
(Buddy System must be used.)			
Training			
<input type="checkbox"/> Verified site workers trained per OSHA 29 CFR 1910.120.			
(See Attachment – Training Program)			
Organization			
<u>Title</u>	<u>Name</u>	<u>Telephone/Radio</u>	
		() - -	
		() - -	
		() - -	
		() - -	
		() - -	
		() - -	
Emergency Plan			
<input type="checkbox"/> Alarm system:			
<input type="checkbox"/> Evacuation plan:			
<input type="checkbox"/> First aid locations:			
Notify the following as soon as possible:	Location	Phone	
	Hospital:	() -	
	Ambulance:	() -	
	Air Ambulance:	() -	
	Fire:	() -	
	Police:	() -	
(See Site Map and Attachment-Site Emergency Response Plan)			
Pre-Entry Briefing			
Hazards discussed (attach training documentation)			
Other topics:			
Date/Time Completed:		By:	
ICS 208 Site Safety Plan (Continued)			

APPENDIX D: MSDS's, MAPS AND DIAGRAMS

Appendix D includes:

- Spill Response Equipment List
- Figure D-1: Sensitive Resources in the Santa Barbara Channel
- MSDS for crude oil
- Sespe Crude Pipeline route (three drawings)
- Sespe Crude Pipeline, Pump and Tank Site (SK-1)

SESPE PIPELINE

Spill Response Equipment and Supplies

8 inch sorbent boom

5 inch sorbent boom

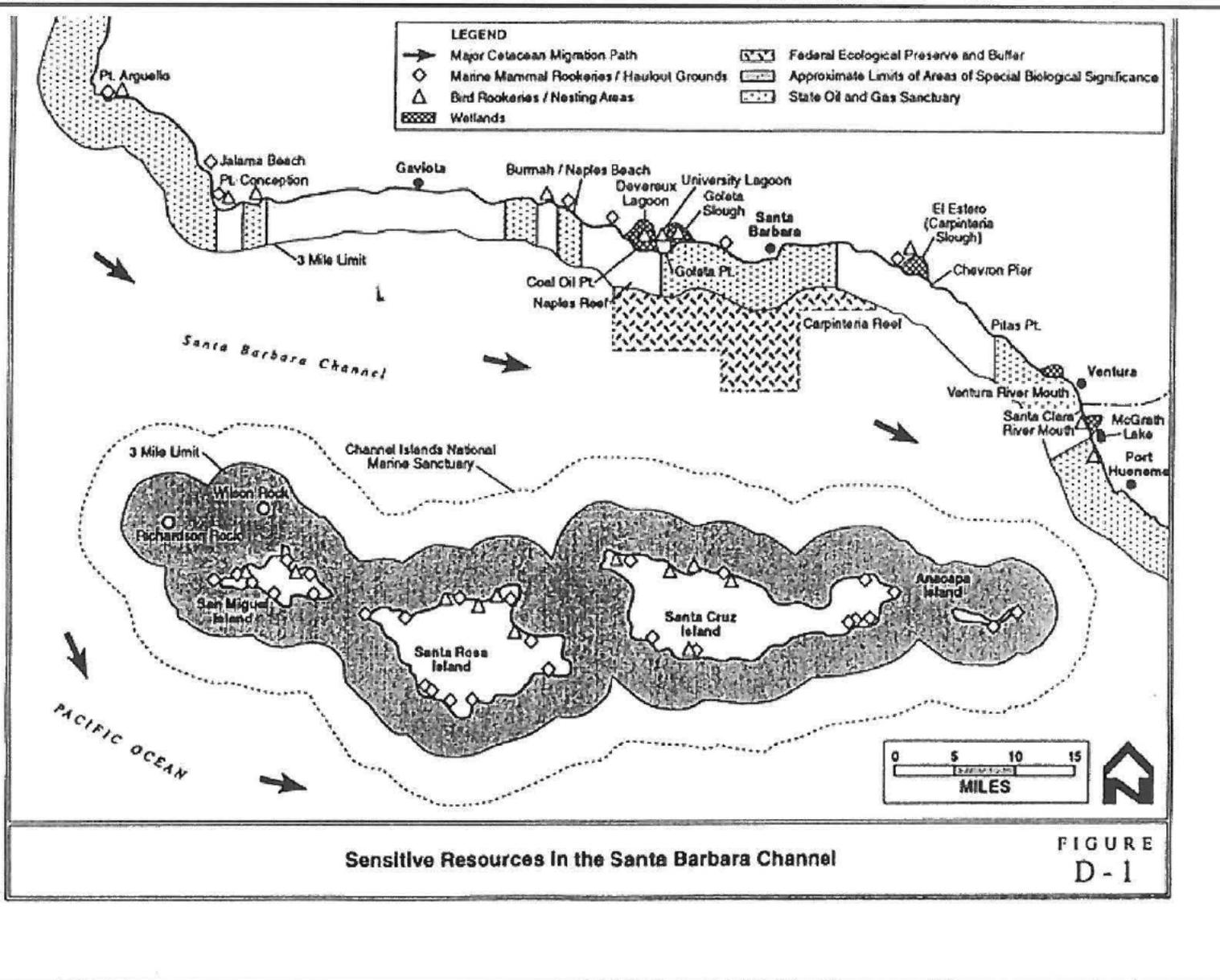
2 foot square sorbent pads

Excelsior or similar

Sand bags

Plastic, roll

Additional spill response equipment and supplies available at Patriot Environmental Service's Yards in Santa Clarita, Ventura, & Bakersfield and Double Barrel Environmental's Yards in Riverside & Bakersfield.



Sensitive Resources in the Santa Barbara Channel

FIGURE
D-1

SENECA RESOURCES**Material Safety Data Sheet**

WHMIS 	Personal Protection 	TDG Road/Rail 
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Section 1. Product Identification and Uses

Common/Trade name	Petroleum Crude Oil		
Synonyms	8002059 ;	CAS #	8002-05-09
Chemical family	Petroleum Hydrocarbon.	DSL	On the DSL list.
Supplier	Seneca Resources Corporation 2131 Mars Court Bakersfield, CA 93308 888-595-8595	Manufacturer	Seneca Resources 2131 Mars Court Bakersfield, CA 93308 888-595-8595
Material uses	Chemical feedstock		

Section 2. First Aid Measures

Eye contact	Flush eyes for at least 15 minutes with clean water. Patch lightly, allowing drainage. Seek medical attention.
Skin contact	Remove contaminated clothing. Wash skin thoroughly with soap and water. Seek medical attention if irritation develops.
Inhalation	Protect rescuer. Move exposed person to fresh air. If breathing has stopped apply artificial respiration. Seek medical attention.
Ingestion	If swallowed, do not induce vomiting or give liquids. Seek immediate medical attention.

Section 3. Hazardous Ingredients

Name	CAS #	Exposure Limits						% by Weight
		TWA (ppm)	TWA (Mg/M3)	STEL (ppm)	STEL (Mg/M3)	CEIL (ppm)	CEIL (Mg/M3)	
Crude Oil (Hydrocarbons C5 and C6 Rich)	68476-50-6	100	525	n/av	n/av	n/av	n/av	60-100
Hydrogen Sulphide	7783-06-4	10	14	15	21	20	28	0.5-2.0
Benzene	71-43-2	0.5		2.5				0.1-1.0
Toluene	108-88-3	20	75					1-5.0
Xylene	1330-20-7		100		150			1-30

Toxicity values of the hazardous ingredients Crude Oil (Hydrocarbons C5 and C6 Rich) LD50: 4,300 mg/Kg. LC50: Not available. Hydrogen Sulphide (H2S) LC50 Inhalation Mouse = 673 ppm 1 hour LC50 Inhalation Rat = 444 ppm for 4 hours Benzene LD50 Oral rat = 930-5600 mg/Kg. LC50 Inhalation rat = 13,700 for 4 hrs. Xylene LD50 Oral rat = 4300 mg/Kg. LC50 Inhalation rat = 6700 ppm for 4 hrs. Dermal rabbit >2000 mg/Kg. Toluene. LD50 Oral rat = 5000 mg/Kg. LC50 Inhalation rat = 8000 ppm for 4 hrs. LD50 Dermal rabbit = 14,000 mg/Kg.

Continued on Next Page

Petroleum Crude Oil (Sour)

Page Number: 2

Section 4. Physical Data

Physical state and appearance	Liquid. Black/Brown.
Odor	Petroleum Odour Rotten eggs.
pH (1% soln/water)	Not applicable.
Odor threshold	Hydrocarbon Not available. H ₂ S = 0.13 ppm
Evaporation rate	Not available.
Freezing point	Not available.
Boiling point	10°C - >1100°C
Specific gravity	0.7 - 1.1 (Water = 1)
Volatility	Not available.
Vapor density	Not available.
Vapor pressure	Not available.
Water/oil dist. coeff.	Not available.
Solubility	Not available.
Molecular Weight	Not applicable.
Melting Point	Not available.
Density	Not available.

Section 5. Fire and Explosion Data

Auto-ignition temperature	Not available.
Flash points	CLOSED CUP: -40°C (-40°F)
Flammable limits	Not available.
Extinguishing Media	Use DRY chemicals, CO ₂ , or foam to extinguish fire. Water may not be an effective medium to extinguish fire. Cool containing vessels with water jet in order to prevent pressure build-up, autoignition or explosion.
Special fire fighting procedures	Contains highly toxic hydrogen sulphide. Hydrogen sulphide is heavier than air and may collect in low lying areas and confined spaces. Use supplied air or self contained breathing apparatus (SCBA) for large fires or for fires in enclosed areas.
Flammability	Highly flammable liquid. Released vapours may form flammable/explosive mixtures at or above the flash point. Vapours may travel considerable distances to ignition sources and cause a flash fire. All storage containers and pumping equipment must be grounded. Remark No additional remark.
Risks of explosion	This material is sensitive to static discharge. This product is not sensitive to mechanical impact. Remark No additional remark.

Section 6. Reactivity Data

Stability	The product is stable.
Hazardous decomp. products	Carbon monoxide, carbon dioxide and irritant fumes and gases including sulphur oxides, nitrogen oxides and aldehydes.
Reactivity	Incompatible material: Strong acids, strong oxidizers, chlorine. Hazardous polymerization: Will not occur. Remark No additional remark.

Continued on Next Page

Section 7. Toxicological Properties

Routes of entry Ingestion. Inhalation. Eye contact. Skin contact.

TLV
 Hydrocarbons
 TLV-TWA 100 PPM (525 mg/m³) for standard solvent from ACGIH.
 Hydrogen Sulfide:
 TWA: 10 ppm, 14 mg/m³ from ACGIH
 STEL: 2.5 ppm STEL from ACGIH
 Toluene
 TWA: 20 ppm from ACGIH
 Xylene (o, m and p isomers)
 TWA: 100 ppm, STEL: 150 ppm from ACGIH
 Benzene
 TWA: 0.5 ppm. STEL: 2.5 ppm from ACGIH SKIN
 Consult local authorities for acceptable exposure limits.

Toxicity to animals Crude Oil (Hydrocarbons C5 and C6 Rich)
 LD50: 4,300 mg/Kg.
 LC50: Not available.
 Hydrogen Sulphide (H₂S)
 LC50 Inhalation Mouse = 673 ppm 1 hour
 LC50 Inhalation Rat = 444 ppm for 4 hours

Remark

No additional remark.

Chronic effects This product may contain benzene. Benzene has been classified by the international agency for research on cancer as a group 1 product indicating sufficient evidence of carcinogenicity. Significant exposures may affect the blood making system resulting in leukaemia. Studies exist which report a link to crude oil and reproductive effects including fetal tumors and menstrual disorders. This product contains small quantities of xylene. High exposure to xylene has produced fetotoxic effects in animal studies. This product may contain toluene which is known to cause visual impairment, narcosis, anxiety, muscle fatigue, insomnia, parathesis, sermatitis, liver and kidney damage and to affect reproduction. This product contains significant concentrations of hydrogen sulphide gas. Chronic health effects resulting from repeated or prolonged exposure to levels exceeding the exposure limits may include bronchitis, bronchial pneumonia and pulmonary edema. This product contains small quantities of polycyclic aromatic hydrocarbons. Prolonged contact with these compound has been associated with the induction of skin and lung tumours.

Remark

No additional remark.

Acute effects Sensitizing Capability: No effects known. Irritancy: Skin, eye and upper respiratory tract irritant. Hydrocarbon vapours are central nervous system (CNS) depressants and may cause headache, dizziness, loss of appetite and loss of consciousness.

Ingestion Pulmonary aspiration hazard if swallowed and vomiting occurs.

Skin Prolonged skin contact can cause defatting of the skin resulting in dry cracked skin and dermatitis.

Eyes Eye contact with product or product vapours may result in eye irritation.

Inhalation Inhalation of crude oil mist or vapours may cause headache, dizziness, loss of appetite and loss of consciousness. Product vapours are irritating to the respiratory tract. This product contains hydrogen sulphide (H₂S) gas which may collect in confined and low lying spaces. Acute effects vary with concentration, from mild eye, nose and throat irritation at approximately 100 ppm to sudden unconsciousness or death at 500 ppm.

Remark

No additional remark.

Synergistic materials Not available.

Section 8. Preventive Measures

Waste disposal Dispose of in accordance with all federal, provincial and local regulations.

Storage Keep away from all ignition sources. Maintain temperature below the flash point. Head spaces in storage containers may contain hydrocarbon vapours and toxic hydrogen sulphide gas.

Ventilation Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value.

Continued on Next Page

Petroleum Crude Oil (Sour)

Page Number: 4

Spill and leak Evacuate unnecessary personnel. Eliminate all ignition sources. Be alert to the potential for the presence of hydrogen sulphide gas and don appropriate protective equipment. Stop leak if safe to do so. Contain spill and absorb with inert absorbent. Large spills should be removed with explosion proof vacuum equipment. Large pools may be covered with foam to prevent vapour evolution. Comply with federal, provincial, and local requirements for spill notification.

Section 9. Classification/Regulatory Information

TDG road / rail TDG CLASS 3: Flammable liquid with a flash point less than or equal to 60.5 C (140.9 F). Closed cup method.



PETROLEUM CRUDE OIL (Petroleum Crude Oil Sour, Hydrogen sulphide) UN 1267

Remark
No additional remark.

WHMIS WHMIS CLASS B-2: Flammable liquid with a flash point lower than 37.8°C (100°F).
WHMIS CLASS D-1A: Material causing immediate and serious toxic effects (Asphixiant).
WHMIS CLASS D-2A: Material causing other toxic effects (Carcinogenic / embryotoxic).
WHMIS CLASS D-2B: Material causing other toxic effects (Irritant).



Remark
No additional remark.

Other This product is on the Domestic Substances List (DSL). TSCA (Toxic Substance Control Act): This product is listed on the TSCA Inventory.
Refer to federal, provincial, and local legislation for further requirements.

Section 10. Protective Clothing

Eye Non-vented chemical goggles to prevent eye irritation.

Skin Impervious gloves and clothing should be worn as appropriate to protect against skin contact. Neoprene or nitrile material is suggested.

Respiratory Respiratory protection may be required in poorly ventilated areas. Air supplied respirators or positive pressure self contained breathing apparatus is required when atmospheric concentrations of hydrocarbon vapours are likely to exceed 10X the occupational exposure limit or when high concentrations of H₂S may be present.

Other As required by the situation according to your companies policies and procedures. Contact your supervisor for direction.

**Section 11. Preparation Information**

References -Provisional Domestic Substances List, Canadian Environmental Protection Act, Volume 1-Registry Number Index, April 1990; Environment Canada. -SAX, N.I. Dangerous Properties of Industrial Materials. Toronto, Van Nostrand Reinold, 6e ed. 1984. CCOHS (Chem advi)
CCOHS(Cheminfo) Documentation of the Threshold Limit Values and Biological Exposure Indices (ACGIH)
Pocket Guide to Chemical Hazards (NIOSH)
Transportation of Dangerous Goods Shedule II List II

MSDS Status

Acronyms: TLV = Threshold Limit Value N/AP = Not applicable N/AV = Not Available COC = Cleveland Open Cup PMCC = Pensky Martens Closed Cup

Continued on Next Page

Petroleum Crude

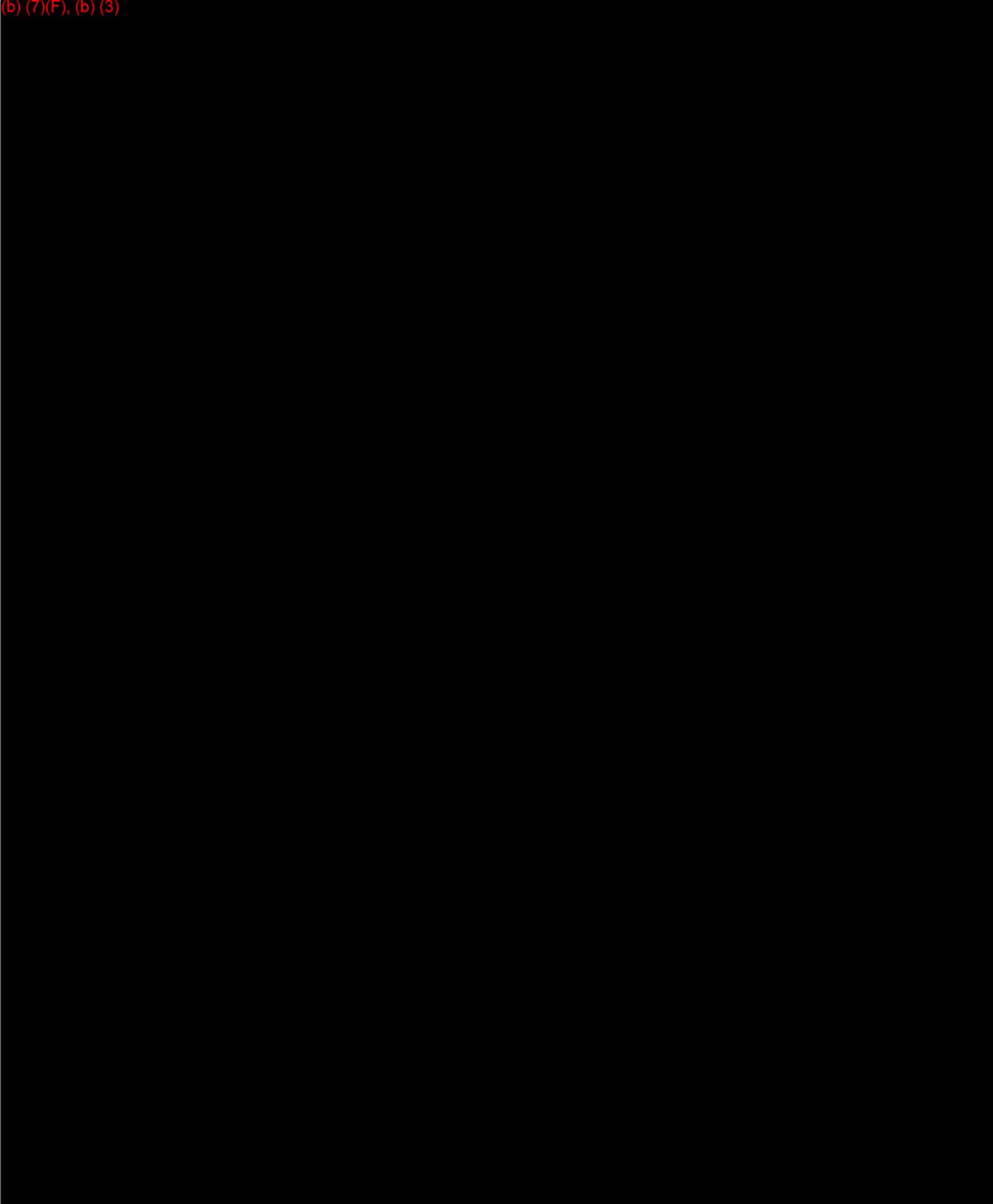
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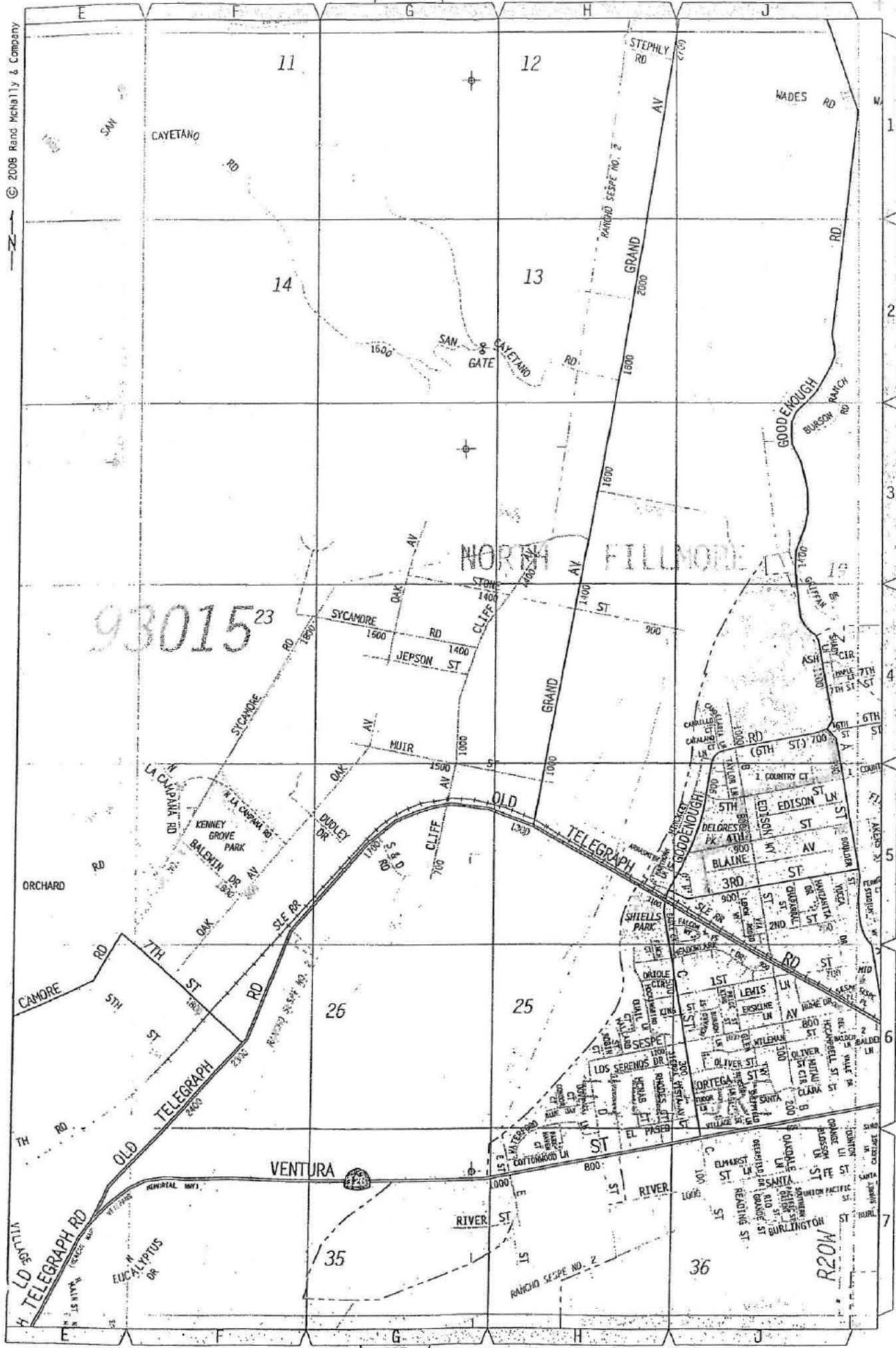
Emergency Phone # 888-595-8595

While the company believes the data set forth herein are accurate as of the date hereof, the company makes no warranty with respect thereto and expressly disclaims all liability for reliance thereon. Such data are offered solely for your consideration, investigation and verification.

CMENTREC (800) 424-9300



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93015²³

NORMA HILLMONT

VENTURA

R20W

SEE 465 MAP

0 .125 .25 .375 .5 miles 1 in. = 1900 ft.

SEE 465 MAP

VENTURA CO

June 2008

SESPE SWING TANKS

SK-1

2" O.D.
2" W.

APPENDIX E: JOB DESCRIPTIONS

A summary of the response functions for each of the sections and members of the SMT is provided below.

E.1 MANAGEMENT

E.1.1 Seneca - West Management

Seneca's Management Team is responsible for ensuring that the pipeline has an organization structured to deal with the spill and that lines of authority are delegated to carry out essential functions. Additionally, they are responsible for ensuring that company line management assembles the necessary personnel to carry out functions needed to assist in the response.

Specific response functions of the Management include:

- Assess reports of the incident and confirm the need for activating the Seneca SMT, including response contractors.
- Gain as much information as possible and assemble management staff for a briefing on the incident.
- Notify the management of other oil companies in the area.
- Provide guidance and support concerning response actions.
- Keep accurate notes for use in the incident history.

E.2 COMMAND SECTION

The Command Section is responsible for the overall management of the spill response and includes certain staff functions required to support the command function. These staff functions include legal, liaison (government and community relations), and public information.

Command functions may be divided between the Incident Commander and the Deputy Incident Commander. The Incident Commander is responsible for "external relations" with the media, the public, government agencies, and Company management. In a unified command structure, the Incident Commander works with individuals designated by government agencies to jointly determine the objectives, strategies, and priorities of the response effort. The Deputy Incident Commander is responsible for "internal relations" working to coordinate the efforts of all the groups.

E.2.1 Incident Commander

The Incident Commander is responsible for the overall management of all incident activities, including the development and implementation of a response strategy that provides for safe control, containment, and cleanup activities. He has complete responsibility and total authority for directing field operations and for making or revoking decisions regarding procedural matters.

Specific duties of the Incident Commander include:

- Initiate necessary action and activate the SMT by contacting the designated team members.
- Assess incident priorities.
- Report directly to management and represent management's interest throughout the response operations.
- Work with other pre-designated Incident Commanders of the Unified Command to formulate tactical and strategic decisions related to the response.
- Assess response needs in cooperation with other pre-designated Incident Commanders of the Unified Command.
- Direct the development of a spill control, containment, cleanup, and disposal plan, and supervise the plan's implementation.
- Appraise the need for chemical agents and, if necessary, initiate the federal and state approval process as early in the response process as possible.
- Direct the Command Staff and Section Chiefs.

- Approve the movement and activities of all visitors (press, public, government representatives) on scene.
- Clear all press releases after they are checked by the Legal Advisor and Liaison Officer.
- Direct the preparation of daily reports and a final written report on the response operations, with assistance from the Operations and Planning Section Chiefs.
- Keep accurate notes for use in the incident history.

E.2.2 Deputy Incident Commander

The Deputy Incident Commander assists the Incident Commander on all aspects of the spill incident. He ensures that the directives of the Incident Commander are carried out.

Specific duties of the Deputy Incident Commander include:

- Respond to the Incident Commander's call for assistance and ensure that all members of the SMT have responded to their assigned positions.
- Obtain the necessary technical and staff assistance.
- Analyze the situation, provide assistance, and recommend actions to the Incident Commander.
- Monitor and direct Seneca personnel and its contractors to meet the strategic and tactical goals of the Unified Command.
- Maintain close liaison with the Operations Section Chief to ensure coordinated efforts in spill control, containment, and cleanup operations.
- Prepare briefing to update Command staff and the Incident Commander, as needed.
- Obtain contractor assistance, as needed.
- Keep accurate notes for use in the incident history.

E.2.3 Legal Advisor

The Legal Advisor provides legal advice on all aspects of the spill incident. He is responsible for all legal matters, and therefore is expected to be thoroughly familiar with the plan and all legal ramifications of spill incidents, including liabilities involved and legal precedents that have been set in previous incidents.

Specific response functions of the Legal Advisor include:

- Stay thoroughly familiar with all applicable local, state, and federal laws and regulations affecting the response efforts.
- Screen press releases for legal implications.
- Advise the Section Chiefs at the start of an operation of which records are necessary to properly document the response efforts in anticipation of potential lawsuits and insurance claims.
- Advise the Finance Section Chief with respect to the legitimacy of claims of damage, contracts, etc.
- Provide legal approval of all reports provided to government agencies.
- Keep accurate notes for use in the incident history.

E.2.4 Liaison Officer

The Liaison Officer is responsible for communicating with local, state, and federal government agencies and community organizations throughout the incident. He is expected to develop and maintain lines of communication with government agencies and community organizations outside of the response situation, and keep up-to-date on relevant contacts. He is also responsible for the coordination of the utilization of volunteers throughout the response effort.

Specific response functions of the Liaison Officer include:

- At the request of the Incident Commander and in coordination with the Legal Advisor, assist Planning Section Chief in obtaining necessary government approvals and permits for actions subject to regulation (such as use of dispersants, access to lands, location and use of disposal sites, use of government-owned equipment, etc.).

- Establish and maintain contact with representatives of government agencies, and convey information and request to the Incident Commander.
- Establish and maintain contact with representatives of community organizations, and convey information and requests to the Incident Commander.
- With the approval of the Incident Commander, arrange for observation visits to the incident by representatives of government agencies and community organizations, and serve as a guide during these visits.
- Work closely with the Legal Advisor, sharing the responsibility of conducting site visits with government on-scene observers.
- Coordinate company response efforts with the Regional Response Team (RRT) or any other committee formed by government to assist in the response.
- Work with the Public Information Officer to publicize telephone numbers/locations where volunteers may call/go for work direction.
- Manage the assignment of volunteers to the response effort.
- Arrange with the Logistics Section Chief to provide support services to volunteers, as necessary.
- Keep accurate notes for use in the incident history.

E.2.5 Public Information Officer

The Public Information Officer is responsible for the formulation and release of information about the spill incident to the news media and other appropriate agencies and organizations. He is responsible for maintaining a close working relationship with these groups, and ensuring that media concerns are clearly and accurately identified and addressed during response operations.

Specific response functions of the Public Information Officer include:

- Prepare regular press releases and statements for release after approved by company management, the Incident Commander, and the Legal Advisor.
- Arrange for and chaperon tours by members of the news media.

- Monitor the reporting by the news media throughout the incident to ensure that factual data are relayed to the public.
- Establish and distribute media guidelines for use by SMT members.
- Keep accurate notes for use in the incident history.

E.2.6 Health and Safety Officer

The Health and Safety Officer is responsible for monitoring and assessing hazardous and unsafe situations, and developing measures for assuring personnel safety. He is thoroughly versed in safe operating practices, and federal and state OSHA requirements. The Health and Safety Officer corrects unsafe acts or conditions through the regular lines of authority, although he may exercise emergency authority to prevent or stop unsafe acts when immediate action is required.

Specific response functions of the Health and Safety Officer include:

- Enforce all safety rules and regulations of the Company.
- Ensure that contractor and company personnel are advised of any hazard in the immediate work area.
- Ensure compliance with OSHA, boating, and helicopter safety regulations.
- Assess the need for and recommend assistance from local fire, police, and emergency rescue units.
- Evaluate response activities to identify and eliminate safety hazards.
- Develop site-specific health and safety plans as required.
- Command search and rescue operations as needed.
- Contact medical centers/hospitals to alert them of the spill incident and to ask them to provide medical service to injured operations and or response personnel as necessary.
- Check safety features of equipment being sent to the response site, and advise on safe operation of all equipment.

- Ensure personal protective/ safety equipment is available and properly used.
- Dispense safety and survival equipment and maintain an inventory of items.
- Coordinate and supervise first aid, maintain records of all first aid and medical cases.
- Coordinate the staging of the fire control equipment.
- Inspect and control sanitation problems, including the safe provision of drinking water and food.
- Provide safety bulletins/messages to response personnel.
- Keep accurate notes for use in the incident history.

E.3 OPERATIONS SECTION

The Operations Section is responsible for directing and coordinating all offshore, nearshore and onshore response operations. Areas of concern include the affected facility and/or environment.

E.3.1 Operations Section Chief

The Operations Section Chief is responsible for all offshore, nearshore and land operations directly applicable to control, containment, cleanup and protection. The Operations Section Chief assists in the formulation of the daily response plans and directs their execution. He is responsible for ensuring that all applicable functions and activities within his section are carried out. He ensures that all available resources are being used efficiently during an oil spill incident. He is also responsible for coordinating activities with Clean Seas, Patriot, Double Barrel, government agencies, contractors, and other cooperatives. He must be thoroughly familiar with cleanup activities from past spills, and keep aware of new developments in cleanup methods, equipment, and materials.

Specific response functions of the Operations Section Chief include:

- Direct all response operations, including deployment of all equipment.
- Establish a firm schedule of communication with the Deputy Incident Commander and/or Incident Commander.
- Review and enact a clear strategy for protection and/or cleanup with the Deputy Incident Commander and/or Incident Commander.
- Determine the personnel, materials, equipment, and supplies required.
- Direct, supervise, and coordinate the efforts of all offshore and onshore response crews.
- Survey the affected area(s) and evaluate the effectiveness of the protection and/or cleanup efforts.
- Provide daily progress reports to the Deputy Incident Commander and/or Incident Commander.
- Maintain up-to-date knowledge of available response equipment.
- Serve as liaison with Planning, Logistics, and Finance Section Chiefs to ensure coordination of getting personnel and equipment to the field, as needed.
- Ensure that safety procedures and practices are followed.
- Keep accurate notes for use in the incident history.

E.3.2 Staging Unit Leader

The Staging Unit Leader is responsible for locating and establishing staging area(s) for both onshore and offshore response operations. He manages all activities within the staging area(s).

Specific response functions of the Staging Unit Leader include:

- Establish pre-designated staging areas if suitably located for response incident.
- Assess the need for additional sites and identify and establish staging areas as necessary.

- Work with Support and Services Unit Leaders to arrange for the necessary level of support and services required by staging area operations.
- Establish layout(s) of staging area(s).
- Establish check-in/check-out system for resources entering or leaving staging.
- Keep Operations informed of resource status changes.
- Demobilize staging area(s) when requested.
- Keep accurate notes for use in incident history.

E.3.3 Waste Disposal Unit Leader

The Waste Disposal Unit Leader is responsible for ensuring that all activities related to the temporary storage, transportation, and disposal of waste materials are conducted in an environmentally sound manner. He is responsible for ensuring that waste generation is minimized, and recycling occurs, where feasible.

Specific response functions of the Waste Disposal Unit Leader include:

- Stay thoroughly familiar with all applicable state and federal rules and regulations pertaining to the temporary storage, transportation, disposal, and recycling of wastes.
- Monitor the temporary storage, transportation, disposal and recycling of wastes.
- Arrange for Company-approved contractors/laboratories and for the testing of waste materials.
- Arrange for Company-approved contractors to transport wastes to approved disposal sites.
- Ensure that the designated disposal sites for waste materials are prepared to accept such materials.
- Coordinate the transfer of waste materials to disposal sites with Operations.
- Supervise the transfer of waste materials to temporary storage areas, and keep Operations advised of the volumes of accumulated waste materials.

- Maintain a log of volume, contents, and description of all waste materials transferred to disposal sites.
- Maintain on file all applicable licenses, manifests, and permit numbers.
- Keep accurate notes for use in the incident history.

E.4 PLANNING SECTION

The Planning Section is responsible for the collection, evaluation, and dissemination of tactical information about the incident. Planning maintains information on the current and forecasted situation, and on the status of resources assigned to the incident. It is responsible for the preparation of daily response plans and documentation of the incident. Planning also coordinates all environmental activities and works with resource agencies on wildlife recovery and rehabilitation efforts.

E.4.1 Planning Section Chief

The Planning Section Chief is responsible for providing advice and assistance to the Incident Commander with respect to response planning and procedures. He is responsible for the development of the daily response plans and their revision, as necessary.

Specific response functions of the Planning Section Chief include:

- Contact other Section Chiefs to determine situation and support requirements.
- Coordinate follow-up checks with other staff members to ensure that all agencies and individuals receive required reports.
- Ensure all response operations are conducted in accordance with federal and state safety requirements.
- Maintain a current roster of personnel and equipment involved in the response efforts.
- Maintain a current roster of personnel and equipment that may be contacted on a 24-hour basis to provide additional support to the response efforts.

- Coordinate documentation of all aspects of the response efforts, ensure that these records are properly maintained, and periodically analyze these records with the objective of improving spill response efforts.
- Coordinate tracking of all mobilization, demobilization, and rotation of response personnel with the Support Unit Leader.
- Ensure adequate, safe, and environmentally sound temporary storage of recovered waste materials.
- Keep accurate notes for use in the incident history.

E.4.2 Documentation Unit Leader

The Documentation Unit Leader is responsible for keeping a detailed log of events, their timing, and minutes. This log is used to write brief narratives of each day's events for distribution to management and for use in the incident history. He is also responsible for maintaining accurate and complete incident files.

Specific response functions of the Documentation Unit Leader include:

- Coordinate the record keeping of all other team members to ensure that the proper data are being recorded.
- Arrange for photographers to record all important events of the response operations.
- Maintain complete files of all correspondence, reports, data sheets, etc. on the response operation.
- Arrange for the collection of newspaper clippings and other information on media coverage of response operations, including monitoring radio and television broadcasts.
- Provide duplication service to response personnel.
- Arrange for the packing and storing of incident files for legal, analytical, and historical purposes.
- Assist in the preparation of a comprehensive final report on the response operations and final reports to government agencies.
- Keep accurate notes for use in the incident history.

E.4.3 Environmental Unit Leader

The Environmental Unit Leader is responsible for managing all environmental issues associated with the incident, response, and clean-up. He is responsible for preparing, submitting, and tracking all permitted activities associated with the response effort. He provides advice and recommendations on water quality, air quality, and cleanup activities.

Specific response functions of the Environmental Unit Leader include:

- Monitor response plans and activities, and advise the Planning Section Chief of permit requirements.
- Complete necessary permit applications to initiate specific activities.
- Track the permit review process to ensure timely approval of permit applications.
- Monitor activities after permits are approved to ensure compliance with permit stipulations.
- Participate in planning session activities and assist in prioritizing mitigation measures.
- Collect area environmental information.
- Continually assess damage/potential damage to the environment.
- Keep accurate notes for use in incident history.

E.4.4 Situation Status Unit Leader

The Situation Status Unit Leader is responsible for ensuring that all resources assigned to the response operations are properly checked in and tracked throughout the incident. He also maintains and displays information on the nature and status of response operations.

Specific response functions of the Situation Status Unit Leader include:

- Establish procedures with Logistics to track equipment and personnel involved in response operations.
- Display resource and environmental status information in Command Post.
- Provide information to Planning Section Chief on resource deployment for consideration/inclusion in daily response plans.

- Maintain a master list of all resources checked in at the incident.
- Prepare and distribute Situation Status Reports to Section Chiefs when required.
- Provide photographic services, maps, and situation status information, as requested.
- Keep accurate notes for use in the incident history.

E.4.5 Wildlife Unit Leader

The Wildlife Unit Leader is responsible for working in cooperation with the Trustee agencies (i.e., California Department of Fish and Wildlife, U.S. Fish and Wildlife Services, and National Marine Fisheries) to ensure that every possible effort is made to retrieve, clean, and rehabilitate affected wildlife.

Specific response functions of the Wildlife Unit Leader include:

- Provide liaison between the Company and Department of Fish and Wildlife.
- Arrange for labor and truck transportation, as requested by the Trustee agencies, with help from the Logistics Section Chief.
- Arrange for volunteer help, as requested by Trustee agencies, with assistance from the Liaison Officer.
- Advise Operations of the potential effect on marine life of the use of chemicals and cleanup materials.
- Arrange for factual documentation by consultants on the effect of the spill on critical wildlife areas.
- Keep fully informed of the progress of control, containment, and cleanup operations.
- Prepare in advance, a list of qualified wildlife consultants who can be contacted in the event of an oil spill.
- Remain current with new developments in bird and wildlife cleaning and rehabilitation techniques.
- Direct wildlife conservation efforts.
- Keep accurate notes for use in incident history.

E.4.6 Technical Specialist Coordinator

The Technical Specialist Coordinator is responsible for providing general technical assistance to the SMT. He manages the identification and acquisition of technical personnel that may be necessary to support response operations. He is also responsible for coordinating the review of solicited and unsolicited proposals received during the incident.

Specific responses functions of the Technical Specialist Coordinator include:

- Provide general technical assistance as needed.
- Assist response team members in determining the need for technical specialists to assist in engineering, environmental, wildlife, natural resources damage assessment, dispersant use, *in situ* burning, bioremediation, air quality and/or water quality monitoring, and other response functions.
- Work with Contracting Unit Leader to execute contracts.
- Work with Planning Section Chief to ensure that contractors and/or consultants providing technical services are aware of and comply with applicable Seneca requirements, standards, and guidelines.
- Coordinate the review of solicited and unsolicited proposals for technical work associated with response operations.
- Inform Planning Section Chief of "new ideas" that have technical merit or technical services that may improve the efficiency and/or effectiveness of response operations.
- Keep accurate notes for use in incident history.

E.5 LOGISTICS SECTION

The Logistics Section is responsible for providing all support needs to the response efforts.

The Logistics Section handles all orders for resources from offsite locations, and provides ancillary facilities, transportation, supplies, equipment maintenance and fueling, housing and food for personnel, and security services.

E.5.1 Logistics Section Chief

The Logistics Section Chief ensures adequate arrangements, including transportation for equipment, materials, and personnel on a 24-hour basis and on very short notice. He is responsible for the preparation and coordination of all equipment, materials, services, and supplies to be dispatched to the response operation, inventory and status control, and maintenance of detailed checklist as to "readiness" of equipment.

Specific response functions of the Logistics Section Chief include:

- Ensure equipment and materials are provided to response personnel, as requested.
- Ensure adequate food and housing for personnel.
- Arrange transportation for equipment, material, and personnel needed to carry out the containment, cleanup, and control operations.
- Provide necessary telephone, CB radio, and other communication facilities.
- Obtain rental office trailers to be used as mobile command posts and maintain close contact on a regular basis to assure a continuing supply of equipment and materials.
- Evaluate all security needs on an ongoing basis, with the assistance of the Deputy Incident Commander, Operations Section Chief, and other team members, as necessary.
- Maintain a daily file of all equipment used and inform the Deputy Incident Commander of inadequate equipment.
- Keep accurate notes for use in the incident history.

E.5.2 Communications Unit Leader

The Communications Unit Leader is responsible for establishing, operating, and maintaining an integrated communications network (both mobile and fixed) for the spill response. He is responsible for developing plans for the effective use of incident communications equipment and facilities, installing and testing communications equipment, establishing and managing the communication and message centers, distributing communications equipment to response personnel, keeping track of communications equipment, and maintaining and repairing communications equipment.

Specific response functions of the Communications Unit Leader include:

- Ensure that a detailed log of all communications (other than routine operational transmittals) is kept by command post personnel manning telephones.
- Assign a dispatcher, as necessary, to take and relay messages.
- Maintain an up-to-date inventory of Company communications equipment.
- Keep accurate notes to use in the incident history.

E.5.3 Support Unit Leader

The Support Unit Leader is responsible for supervising the acquisition of personnel, equipment, transportation, and facilities needed to support response operations. The Support Unit Leader works with the Section Chiefs to determine the level of support required for response operations.

Specific functions of the Support Unit Leader include:

- Ensure that Unit Leaders have the equipment, materials, facilities, and transportation resources necessary to support their activities.
- Ensure an adequate pool of response personnel.
- Maintain a current file of all personnel available and their location.
- Set up local personnel office(s), if necessary.
- Assist Company team members in making travel and accommodation arrangements as needed.
- Work with the Finance Section Chief on payroll requirements for contract labor.
- Work with Section Chiefs to identify transportation needs.
- Develop and implement a Transportation Plan.
- Collect and record information about the use of rented boats and vehicles.
- Collect and record information about the use of transportation services.
- Ensure that transportation schedules are developed and maintained.
- Ensure compliance with all transportation-related standards and regulations.

- Work with government officials in setting up air, marine, and land routes to expedite the movement of personnel, equipment, materials, supplies, and waste products.
- Work with Services Unit Leader to ensure the acquisition of materials and supplies needed to make/keep equipment operational in the field.
- Develop a schedule for the movement and delivery of equipment to, within, or from the incident scene.
- Gather and post status information on equipment and personnel.
- Evaluate the adequacy of existing facilities with respect to the needs of response operations.
- Arrange for facilities (e.g. sleeping quarters, office space, warehouses) needed to support response operations.
- Ensure facilities comply with government building and safety regulations.
- Work with Security Unit Leader to ensure adequate security services are available at facilities.
- Work with Services Unit Leader to ensure that facilities are properly maintained.
- Keep accurate notes for use in the incident history.

E.5.4 Services Unit Leader

The Services Unit Leader is responsible for managing the delivery of food, maintenance, materials handling, fabrication, and medical services associated with response operations. He works with the Section Chiefs to determine the level of service required to support response operations.

Specific response functions of the Services Unit Leader include:

- Work with the Health and Safety Officer to develop a Medical Emergency Plan.
- Arrange for first, aid, medical aid, and transportation for injured and/or ill response personnel.
- Work with Support Unit Leader to develop a distribution plan for personnel, equipment, materials, and supplies.
- Provide food services and potable water supply for response personnel.
- Obtain potable sanitary facilities and arrange for their regular maintenance.

- Arrange for fuel and lubricants delivery to support response operation.
- Identify and if necessary secure the services of skilled contract personnel to provide fabrication services.
- Establish a program of regular inspection and maintenance of response equipment.
- Keep accurate notes for use in the incident history.

E.5.5 Security Unit Leader

The Security Unit Leader is responsible for the overall security needs of the response efforts. His responsibilities include providing security for facilities, staging areas, and personnel, as necessary.

Specific response functions of the Security Unit Leader include:

- Evaluate security needs on an ongoing basis.
- Implement all approved security measures as expeditiously as possible.
- Prepare in advance a list of contractors (equipment, materials, and personnel) which may be needed to improve site security needs.
- Contact local enforcement agencies and coordinate with them, as necessary.
- Keep accurate notes for use in the incident history.

E.6 FINANCE SECTION

The Finance Section is responsible for all financial services. Unit Leaders assigned to this section include Accounting, Contracting, and Claims/Insurance. This section is activated only if the incident warrants it.

E.6.1 Finance Section Chief

The Finance Section Chief is responsible for all financial and administrative aspects of the incident response, including cost analysis for procurement of resources, development of a project budget, accounting, clerical support, contracts, and data processing. She is responsible for all actions in family support protocol, in the event of injury or death to a Company employee and/or contractor. The Finance Section Chief is expected to protect

Seneca's interests in financial dealings, and to provide sound business management practices, including accurate and complete obligation documents for the duration of the incident.

Specific response functions of the Finance Section Chief include:

- Review requests for additional personnel or equipment, contracts, rental agreements, invoices, and other agreements to ensure accuracy and cost control.
- Collect, check, and review all daily performance sheets from response contractors or other personnel resources, to ensure accuracy and to prevent overcharging.
- Advises the Incident Commander of monies expended, and prepare cost forecasts for completing response operations.
- Establish procedures to receive, review, and process damage claims.
- Perform other accounting functions, as required.
- Keep accurate notes for use in the incident history.

E.6.2 Accounting Unit Leader

The Accounting Unit Leader is responsible for administering all financial matters pertaining to vendor and service contracts. She is responsible for the development of guidelines and procedures for equipment acquisition, equipment rental, and inventory control.

Specific response functions of the Accounting Unit Leader include:

- Contact appropriate supervisors on their needs and any special procedures.
- Work with Support and Services Unit Leaders to develop and implement an Incident Procurement Plan.
- Develop and implement a Cost Accounting Program, including labor, material, and services used.
- Coordinate all required paper work with Logistics.
- Obtain a listing of activated contracts/agreements.

- Develop and administer a cash account.
- Establish and administer a payroll system.
- Coordinate with Claims/Insurance on procedures for handling claims.
- Check on equipment time recording for accuracy and completeness.
- Maintain final incident receiving documents.
- Verify all invoices.
- Periodically prepare cost analyses.
- Maintain a cumulative cost/financial record.
- Keep accurate notes for use in the incident history.

E.6.3 Contracting Unit Leader

The Contracting Unit Leader is responsible for negotiating, maintaining, and/or closing all contracts used during the response incident. He should be familiar with Company contracting guidelines and when necessary request assistance from the Legal Advisor in executing new contracts.

Specific response functions for the Contracting Unit Leader include:

- Work with Logistics to identify the personnel, equipment, materials, supplies, and services that will be utilized during the response incident.
- Determine whether new and/or existing contracts can be executed to obtain the necessary resources for the response incident.
- Obtain and review existing contracts to ensure that Seneca is aware of and complies with all terms and conditions.
- If necessary, negotiate modifications to existing contracts.
- Negotiate new contracts.
- Provide a copy of all contracts to the Accounting Unit Leader.
- Brief Logistics on the terms and conditions of contracts.
- Work with the Legal Advisor and Claims/Insurance Unit Leader to resolve conflicts/disputes that arise during the response incident.

- Process contract closures.
- Maintain a contracts file.
- Keep accurate notes for use in the incident history.

E.6.4 Claims/Insurance Unit Leader

The Claims/Insurance Unit Leader is responsible for processing claims and arranging with insurers settlements resulting from the occurrence of a serious injury, death, or damages attributable to the incident. He should be familiar with the events and conditions related to the incident to determine the various insurance programs that may be involved.

Specific response functions of the Claims/Insurance Unit Leader include:

- Be thoroughly familiar with all applicable local, state, and federal laws and regulations affecting the Company's response efforts.
- Advise Documentation Unit Leader at the start of an operation of which records are necessary to properly document the response operations in anticipation of potential insurance claims.
- Establish a system for the receipt, evaluation, and processing of all claims.
- Provide qualified claims adjustors to investigate claims of damage.
- Set up claims office(s), if necessary.
- Handle inquiries from insurance companies and accompany claims adjustors on tours of the site.
- Keep accurate notes for use in the incident history.