

VERDUN OIL COMPANY

HSE CONTRACTOR HANDBOOK

VDN-HSE-CON-HBK-001 · Revision 1

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Owner: EH&S Director, Verdun Oil Company

This handbook is a companion to VDN-HSE-MAN-001 (Verdun HSE Manual)

Welcome

If you are reading this, you or someone in your company is doing work on a Verdun site.

Our HSE program exists for one reason: every person who comes to a Verdun site goes home in the same shape they arrived.

This handbook is the short version of what we ask of you. It is not the full Verdun HSE Manual — that document is several hundred pages and lives on our intranet. This handbook is what you need to know to work safely on Verdun sites: our Life-Saving Rules, the permits we use, the rules of the road, what to do when things go wrong, and how we work together.

Read it. Carry it. Talk about it with your crew. And when something doesn't look right on a Verdun site, stop the work — every worker on a Verdun site has that authority, and we will never punish you for using it. If needed, you may contact me at the number / address below with any concerns that you may have.

Stay safe out there.

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1. Purpose and Applicability

What this handbook is

This is the contractor-focused summary of Verdun's HSE program. It tells you and your workers what to expect on Verdun sites and what we expect from you. Read it before you arrive, keep it accessible during the work, and use it as a training tool with your crews.

Who this applies to

This handbook applies to:

- Every third-party contractor and subcontractor performing work on a Verdun-operated site.
- Every contractor employee, consultant, and visitor sponsored by your company on a Verdun site.
- Every scope of work — drilling, completions, workovers, construction, facilities, compression, hauling, well servicing, environmental services, line locate, and any other field-based activity on Verdun property.

Relationship to other documents

Verdun maintains a full HSE Manual (VDN-HSE-MAN-001) covering all operations. This contractor handbook is the contractor-focused subset of that manual.

When your own HSE program is stricter

If your company's HSE standard is stricter than Verdun's in a given area, follow your own.

If there's a conflict you can't resolve

Talk to your Verdun Contractor Sponsor first. If that doesn't resolve it, your company's leadership contacts the Verdun HSE Director. Don't guess — ask. Again, if needed, you can contact me directly. Jeff Conaway, HSE Director. Jconaway@verdunoilco.com, 281-382-8431

2. Verdun's Core HSE Expectations

The four expectations on every Verdun site

Plan the work. Follow the plan. Stop when something is wrong. Report what you see.

Every contractor and every contractor worker on a Verdun site is expected to:

Plan the work

- Run a Job Safety Analysis (JSA) for every non-routine task and for any task with a credible injury or environmental risk.
- Conduct a pre-job safety meeting at the start of every shift on location with every worker on the crew.
- Verify the right permits are issued before work starts.
- If you, or any member of your crew, feel that they cannot complete or perform the planned work, stop the job, and contact your supervisor.

Follow the plan

- Do the work the way the JSA says. If the work needs to change, stop and revise the JSA before proceeding.
- Honor every permit condition. Permit conditions are not guidelines — they are requirements.
- Use the PPE the task and the SDS require.

Stop when something is wrong

- Every worker on a Verdun site has Stop Work Authority. Use it.
- Examples of stop-work triggers: the JSA doesn't fit the conditions, equipment isn't fit for purpose, your gut says something is off, permit conditions have changed.
- Stopping work in good faith is never punished at Verdun.

Report what you see

- Report every injury, near-miss, hazard, Stop Work event, spill, vehicle incident, property damage, and Life-Saving Rule violation.
- Report through your Verdun Contractor Sponsor and the Onsite Supervisor. Verdun records these in our system of records, Trench Safe.
- Verdun does not retaliate against good-faith reporting. We protect the reporter.

Same rules for everyone

Verdun employees follow the same rules you do. There is no different standard for company personnel — and no looser standard for contractors. Where your company is stricter, follow your own.

3. The Nine Verdun Life-Saving Rules

Why these rules exist

These nine rules describe the activities most likely to kill or seriously injure workers in our industry. They are not “rules of thumb.” Violating a Life-Saving Rule on a Verdun site is treated as a serious matter — see §13 for consequences. Every worker on a Verdun site is expected to know these rules and follow them.

Verdun adopts the nine IOGP Life-Saving Rules without modification:

🛡️ 1	Bypassing Safety Controls	Obtain written authorization before overriding or disabling a safety control.
🛡️ 2	Confined Space	Written authorization required before entry. Isolation, atmospheric testing, attendant, written rescue plan.
🛡️ 3	Driving	Always wear a seatbelt. Do not use a phone while driving. No speeding . Rested and alert.
🛡️ 4	Energy Isolation	Verify isolation of hazardous energy and zero energy before work. One worker, one lock. You remove your own.
🛡️ 5	Hot Work	Permit required. Gas-tested below limit. Combustibles cleared. Dedicated fire watch.
🛡️ 6	Line of Fire	Keep yourself and others out of the line of fire. Position against released energy and moving objects.
🛡️ 7	Safe Mechanical Lifting	Plan the lift. Qualified operator. Inspected rigging. Barriers. Never under a suspended load.
🛡️ 8	Work Authorization	Work with a valid permit when required. Read it, understand it, and verify conditions in the field.
🛡️ 9	Working at Height	Inspected fall protection. 100% tied off above the trigger height. Tools secured. Rescue plan ready.

Two rules deserve extra attention

Bypassing Safety Controls (LSR 1) and Line of Fire (LSR 6) are the most frequently violated rules— and they are leading contributors to fatalities. Make them part of every JSA conversation.

4. Stop Work Authority and Hazard Reporting

Stop Work Authority — six steps

1. Say STOP. Loud enough to be heard.
2. Get yourself and others out of the line of fire.
3. Tell the Onsite Supervisor what you saw.
4. Work the issue together — fix the hazard, replace the tool, re-train, re-plan.
5. Only return to work when the Onsite Supervisor confirms it is safe.
6. Document the Stop Work — Verdun records it in Trench Safe.

Who has Stop Work Authority

Every worker on a Verdun site — every Verdun employee, every contractor employee, every subcontractor employee, every visitor. You do not need permission. You do not need to be a supervisor. You see it, you act.

Use Stop Work when:

- Equipment isn't fit for purpose — damaged, expired, the wrong tool for the task.
- A permit condition isn't actually in place in the field, even if the paper says it is.
- The JSA doesn't match what's actually happening — scope has changed, conditions have changed, crew has changed.
- Someone is in the line of fire — pressure, moving equipment, swinging load, dropped object.
- A Life-Saving Rule is about to be violated.
- Your gut says something is wrong, even if you can't immediately name it.
- You do not feel qualified to perform the planned task.

Reporting hazards and near-misses

Even when you don't stop work — when you see a condition or behavior that could have been worse — report it. These reports are how Verdun stays ahead of injuries.

- Tell the Onsite Supervisor or your Verdun Contractor Sponsor.
- Be specific: what you saw, where, who was involved, what could have happened.
- Verdun enters reports into Trench Safe and tracks corrective action to closure.
- Your name is recorded — but reports made in good faith are protected. Verdun does not retaliate against reporters. Ever.

No retaliation — full stop

If anyone — Verdun employee, contractor management, fellow worker — pressures you not to report, or punishes you for reporting, that is itself a serious violation of Verdun policy. Tell the HSE Director directly.

5. Before Coming to Site

This section is for your company's management, your dispatcher, your HSE lead, and your supervisors. The work begins before anyone shows up at the gate.

5.1 ISNetworld Prequalification

Verdun uses ISNetworld to evaluate contractor safety programs, training records, insurance, and historical performance. Your company must be ISNetworld-prequalified before any field work.

Status	What it means for you
Green	Approved for Verdun work. The default.
Yellow	Gaps identified. You may work for Verdun only with a documented Mitigation Plan approved by your Contractor Sponsor and the Verdun HSE Director.
Red	Below Verdun's standard. Not approved for Verdun work without senior approval (HSE Director plus Accountable VP). Rare.

5.2 Your Verdun Contractor Sponsor

Every contractor working on a Verdun site has a named Verdun employee as its Contractor Sponsor. The Sponsor authorizes your work, confirms your prequalification, coordinates orientation, and has the authority to remove your company from a site if expectations are not met.

- You will be told who your Sponsor is at the time work is awarded.
- Contact your Sponsor for HSE questions, gaps, and concerns.

5.3 Required Training for Your Workers

Your workers must hold the training required for the tasks they will perform on Verdun sites. Records must be current and produceable on request. Verify before you dispatch:

- Driving — Defensive Driving training; CDL where applicable. Refresher every 3 years.
- H₂S — H₂S Awareness or H₂S Operations, annually.
- Confined Space — OSHA Confined Space training for entrants, attendants, and entry supervisors; annual.
- Hot Work — Hot Work / Fire Watch training. Qualified Gas Tester for designated personnel.
- Energy Isolation / LOTO — Authorized Employee LOTO training; annual.
- Working at Height / Fall Protection — fall protection user training and harness inspection.
- Mechanical Lifting / Rigging — operator certification (NCCCO or equivalent); qualified rigger / signal person.
- Hazard Communication (HazCom / GHS) — for chemical-handling roles.
- NORM, silica, heat stress, and other task-specific topics where exposure exists.
- First Aid / CPR / AED — designated responders; every 2 years.

5.4 Short-Service Worker (SSW) Identification

Workers with less than 6 months of experience in their current role — or with less than 6 months at your company — are Short-Service Workers. Your obligations:

- Identify your SSWs to Verdun before they arrive.
- SSWs wear visible identification (sticker on hard hat, vest, or other approved marker) at all times on Verdun sites.

- Each SSW is paired with a named mentor — an experienced worker on the same crew. The mentor is not “the crew.”
- After 6 months and a documented review, SSWs come off the program.

5.5 Drug and Alcohol Policy

Verdun maintains a zero-tolerance drug and alcohol policy on its sites. Contractors are subject to it and to their own employer’s program — stricter applies. Reasonable suspicion and post-incident testing are standard. Workers who are fit for duty — rested, alert, free of impairment — are expected on every shift. Any worker who reports to a Verdun site under the influence will be removed.

5.6 Bridging Documents (Major Contractors)

If your company has a substantial, multi-month scope and your own robust HSE management system — drilling, completions, frac, workover, construction at scale — Verdun and your company will operate under a bridging document. The bridging document aligns the two programs: which permit Verdun issues, which you issue, which procedures apply, and how coordination works.

- Bridging documents are drafted jointly by your Verdun Contractor Sponsor and your HSE lead.
- Approved by the Verdun EH&S Director and your senior HSE management.
- Reviewed annually and updated when scope or programs change.
- If a bridge document exists for your work, it controls where it explicitly applies.

6. On Site — Arrival and Daily Rules

6.1 Site HSE Orientation

Before your workers go past the gate, they receive a Site HSE Orientation. This is delivered by a Verdun representative — usually the Onsite Supervisor or a Verdun trainer.

- Short, on-location orientation for small groups or routine work.
- More comprehensive orientation at a field office or conference setting, used for larger groups or new contractor crews.
- The Onsite Supervisor may ask for it.

6.2 Check In with the Onsite Supervisor

Every Verdun site, every shift, every worker: check in with the Onsite Supervisor.

- Sign in. The sign-in log is the source of truth for muster accountability during an emergency.
- Receive the site-specific hazard briefing — active jobs, permits, SIMOPS, hazards, muster point, evacuation route, emergency contacts.
- If conditions change during your shift, expect another briefing.

6.3 Minimum PPE on Every Verdun Site

Outside an enclosed building or vehicle, every worker on a Verdun operating site wears:

- Hard hat (ANSI Z89.1) with current orientation sticker.
- Safety glasses (ANSI Z87.1) with side shields.
- Steel-toed boots (ASTM F2413), slip-resistant sole.
- Flame-resistant clothing (FRC) — NFPA 2112 or 70E — at any site with flash fire or arc flash hazard. That includes most production, completion, midstream, and compression locations.
- Hearing protection where noise exceeds 85 dBA TWA or signage requires.

- Task-specific gloves — cut/impact for general; chemical-resistant matched to the chemical; insulated for electrical.
- Personal H₂S monitor where H₂S exposure is credible — most Eagle Ford and Austin Chalk sites.
- High-visibility apparel where vehicle or heavy-equipment traffic is active.
- Fall protection harness, lanyard, or SRL when working above the trigger height (4 ft / 6 ft).

PPE goes on the moment you leave your vehicle — not when you walk up to the equipment.

6.4 H₂S Awareness

Hydrogen sulfide (H₂S) is present at many Verdun sites. It is colorless, heavier than air, and at certain exposure concentrations it deadens your sense of smell within seconds.

- Wear your personal H₂S monitor in your breathing zone — not in a pocket.
- Know the wind direction. The wind sock and streamers are operating equipment, not decoration.
- If your monitor alarms or you suspect H₂S, leave the area immediately — upwind or crosswind. Do not investigate.
- Account for everyone at the muster point.
- Do not re-enter until atmospheric monitoring confirms it is safe and the Onsite Supervisor authorizes.
- Untrained rescue attempts kill rescuers. Do not enter an area in alarm to help someone unless you are trained, equipped (SCBA), and authorized.

6.5 Phones, Cameras, Smoking, Vaping

- No phone use while driving. Pull over to call, text, or use the device. No phone use walking on an active operating site — stop, step to a safe area, then use.
- In classified areas, only intrinsically-safe electronic devices.
- No smoking, vaping, or open flame in classified or hazardous areas. Designated smoking areas only — and only if marked.
- Photography of Verdun operations requires Onsite Supervisor authorization. No social media posts, no streaming from Verdun sites.

6.6 Housekeeping

- Your work area is your responsibility. Leave it as clean as or cleaner than you found it.
- Tools and materials in their place when not in use — not on stairs, platforms, or walkways.
- Hoses and cords routed overhead or along edges — not across walkways.
- Spills, leaks, and weeps addressed immediately.
- Trash and debris removed at the end of every shift.

7. Driving and Vehicles

Driving is the highest-frequency fatality risk

Vehicle incidents on lease roads and highways are the leading cause of industry fatalities in onshore oil and gas. Verdun's driving rules apply to every trip — short or long, lease road or interstate, company vehicle or personal — when driving on Verdun business.

7.1 The Non-Negotiables

- Seatbelt — driver and every passenger, every trip, every distance.
- No phone use of any kind while driving. Pull over.
- Speed appropriate for conditions — posted speed is a maximum, not a target.
- Headlights on always on lease roads.
- Fitness for duty — if you are too tired to drive safely, you do not drive. Stop, rest, or get a different driver.

7.2 Verdun Lease Roads

Verdun lease roads are working ranches. The posted speed limit is 25 mph or as posted lower — reduce further for rain, dust, gravel, livestock, or any condition that limits visibility or traction.

- Yield to tank trucks, frac trucks, workover rigs, and crew trucks on narrow lease roads. Pull off, stop, let them pass.
- Slow for cattle. Give them room. Never honk to move them.
- Watch for deer at dawn and dusk.
- Use spotters when backing on a pad or near equipment. Park to pull through wherever possible. Never back blind.
- Park outside hazardous areas. Wheels chocked on slopes.

7.3 Pre-Trip Vehicle Inspection — Every Trip

Before every trip on Verdun business, the driver inspects the vehicle. Defects tag the vehicle out of service. The inspection covers:

- Tires, brakes, lights, mirrors, seatbelts, fluids.
- Fire extinguisher (charged, mounted, accessible), spare tire and jack, first aid kit, emergency triangles.
- Required PPE in the vehicle — hard hat, safety glasses, FRC, steel-toed boots, gloves, H₂S monitor, water (heat-stress season).
- Phone or radio operational.
- Documentation current — registration, insurance, inspection.

7.4 Journey Management

File a journey management plan with your dispatcher or the Verdun Onsite Supervisor for:

- Trips over 250 miles.
- After-dark long-distance driving.
- Severe weather conditions.
- High-risk routes — heavy construction, frequent livestock, unfamiliar terrain.

7.5 Hours of Service

Where federal motor carrier rules apply, your drivers must comply with FMCSA hours-of-service requirements. Even where they don't formally apply, Verdun expects you to manage driver fatigue.

8. Permits to Work

Verdun uses five permit types in the field, plus Management of Change (MOC) for bypassing safety controls. A permit is how high-risk work is authorized — it names the work, the conditions, the people, and the duration.

8.1 When a Permit Is Required

A Verdun permit is required for:

Activity	Permit Type
Welding, cutting, grinding, burning, open flame, sand blasting, hot tap, vehicle in hazardous area, non-IS devices in hazardous area	Hot Work Permit
Entry into a permit-required confined space — tanks, vessels, separators, cellars, large-bore piping, excavations ≥ 4 ft	Confined Space Entry Permit
Excavation > 5 ft, or any excavation with cave-in potential or hazardous atmosphere	Excavation Permit
Servicing or maintenance requiring isolation of hazardous energy	Energy Isolation (LOTO) Permit
Other high-risk work the Onsite Supervisor designates	General Work Permit
Bypassing, disabling, or overriding a safety control	MOC or specific Bypass Permit

8.2 Who Issues Permits

Unless your bridging document says otherwise, Verdun Authorized Permit Issuers issue permits for work on Verdun-controlled equipment. Your supervisors and workers are the Permit Receivers — named individuals who sign the permit, confirm conditions in the field, and execute the work to the permit conditions.

8.3 Permit Conditions Are Real

- A signed permit isn't a safety control — the gas test, fire watch, isolation, and barricades are. The permit documents that they're in place. Verify them at the equipment.
- Read the permit before you start. If a condition doesn't make sense, ask. If a condition isn't actually in place, stop.
- Brief the permit at your pre-job safety meeting. Every affected worker signs.
- Post the permit at the work location for the duration of the work.

8.4 When Conditions Change — Permit Suspended

Permits are suspended — work stops — when:

- Wind shifts (hot work, H_2S exposure).
- Atmospheric monitoring exceeds limits.
- Scope of work changes.

- Crew or supervisor changes without prior arrangement on the permit.
- Adjacent work activity changes (SIMOPS).
- Shift change without revalidation.

The permit is revalidated by the Permit Issuer (conditions checked, briefing redone) before work resumes — or a new permit is issued.

9. High-Hazard Work Expectations

Short summaries of the key field rules for each high-hazard task. Full procedures are in the Verdun HSE Manual (VDN-HSE-MAN-001). When in doubt, ask your Verdun Contractor Sponsor or the Onsite Supervisor.

9.1 Lifting and Rigging

- Qualified operators only. Certifications current.
- Inspected crane and rigging before every use. Damaged or expired rigging is tagged out.
- Signal person for any lift where the operator cannot see the load.
- Exclusion zone with barricades — no one in the swing path.
- Never walk under a suspended load. Ever.
- Critical Lift Plan required if load $\geq 75\%$ of crane capacity, personnel lift, tandem lift, lift over operating equipment, or blind lift.

9.2 Energy Isolation / Lockout-Tagout (LOTO)

- All energy sources identified — electrical, pressure, mechanical, thermal, chemical, gravity, stored.
- Equipment-specific procedure used where one exists; otherwise the Verdun Energy Isolation Coordinator (EIC) documents the steps.
- Each worker exposed to the isolated energy applies their personal lock. One worker, one lock.
- The Try step is non-optional — verify zero energy by actually attempting to start the equipment.
- You remove only your own lock — at the end of your work.
- Confined space entry requires positive isolation (blinding, disconnection, removal). Single-block-and-bleed is not acceptable for entry.

9.3 Working at Height

- Fall protection required at 4 ft (general industry) or 6 ft (construction) where guardrails or other passive protection are not in place.
- Inspect harness, lanyard, SRL, and anchor before every use.
- Anchor points must be rated (typically $\geq 5,000$ lb per worker) and identified. Small-bore pipe and conduit are not anchors.
- Tie off 100% — including during transitions between anchors. Use double-lanyard or SRLs.
- Secure tools at height. Empty pockets and shirt pouches before climbing.
- Drop zones below elevated work are barricaded and clear of personnel.
- Rescue plan in place before going up. Suspension trauma is a medical emergency.

9.4 Line Opening / Pressure

- LOTO complete and verified before breaking containment.
- Depressurize to zero at a bleed point — confirmed at a gauge, not by assumption.
- Stand to the side of the connection. Never directly in front.
- Loosen bolts in a star pattern, in stages. Let residual escape laterally before fully removing bolts.
- PPE for the worst-case product — FRC, chemical gloves, face shield, SCBA where the line could contain H₂S.
- Sour service: continuous H₂S monitoring during the line opening.

9.5 Hot Work

- Hot Work Permit issued and posted before work starts.
- Gas test by a Qualified Gas Tester. Acceptable in hazardous area: $\leq 0\%$ LEL. Continuous monitoring.
- Combustibles within 35 ft removed, wetted down, or shielded. Sewers and drains covered.
- Dedicated fire watch — not the welder, not the welder's helper. Charged extinguisher, clear escape route, watching for sparks and smoldering.
- Maintain fire watch ≥ 30 minutes after hot work ends.
- Permit revalidated at shift change, when conditions change, or when work extends beyond duration.

9.6 Confined Space Entry

- Confined Space Entry Permit issued. Positive isolation in place.
- Atmospheric test top, middle, bottom: O₂ 19.5–23.5%, LEL $\leq 10\%$, H₂S ≤ 10 ppm. Continuous monitoring during entry on the confined space entry permit
- Trained attendant outside the space at all times — cannot leave for any reason.
- Written rescue plan with trained rescuers and equipment on site or available within plan response time. Not “we’ll call 911.”
- Hot work inside a confined space requires both permits.

9.7 Excavation

- Texas One-Call (811) line locate for every excavation, every depth, every time.
- Excavations > 5 ft require an Excavation Permit and a Competent Person designation.
- Protective system sized to soil type — sloping, shoring, or shielding.
- Spoils ≥ 2 ft from edge. Equipment outside swing radius.
- Excavations ≥ 4 ft evaluated as confined space candidates — atmospheric testing required. Exit point every 25 ft.
- Competent Person inspects before each shift, after rain, after freeze-thaw, after any change.

9.8 Chemical Handling

- SDS available at every site for every chemical on site. If you cannot find an SDS, stop — do not handle the chemical.
- GHS labels intact on every container. Damaged or missing labels = container out of service.
- PPE matched to the chemical per the SDS — chemical-resistant gloves of the right material, splash goggles or face shield, apron or suit, respiratory protection where required.
- Eyewash and emergency shower within 10 seconds of corrosive or toxic chemical handling.
- No mixing of chemicals without verifying compatibility.

9.9 Heat Stress (Texas-Specific)

- Heat illness is a year-round risk in South Texas and a high-frequency risk from April through October.
- Hydrate before you're thirsty. Drink water every 15–20 minutes during outdoor work in heat. Electrolytes on heavy-sweat days.
- Acclimatization for new workers and SSWs over 7–14 days. Start with shorter exposure and lower workload.
- Work-rest cycles scaled to heat index and workload. Shaded rest areas mandatory.
- Buddy system in heat-stress conditions — workers in pairs, each watching the other.
- Stop-work threshold: when heat index exceeds the Verdun program limit (typically 105–108°F), non-essential outdoor work is rescheduled.
- Heat stroke is a medical emergency. Call 911 and cool the worker aggressively. Do not wait for EMS to start cooling.

10. Environmental Expectations

Prevent first. Contain immediately. Report.

The first 30 minutes of a spill determine the size of the response and the regulatory consequence. The first action is always containment — if you can do it safely. Then report.

10.1 Spill Response

- Stop the source — if you can do it safely. Close valves, isolate the line, close the dump valve.
- Contain at the source — absorbent, booms, berms. Block storm drains and culverts downstream.
- Notify the Onsite Supervisor immediately for any release, regardless of size or location.
- You don't make those calls — your Verdun contact does.
- Do not clean up or move evidence until investigation is complete unless necessary for ongoing safety.

10.2 Waste Management

- Segregate waste at the source. Mixed waste is a violation.
- Label every container with the waste stream, accumulation start date, and generator info.
- Use compatible, leak-tight containers. Inspect regularly.
- Manifest every shipment off-site. Verify the receiving facility's permits.
- Verdun does not bury, burn, or otherwise informally dispose of any waste on lease. Neither do you.

10.3 Air, Permits, and Equipment

- If you operate or maintain Verdun-permitted equipment (engines, compressors, dehydrators, control devices), run it as designed. Permit conditions are operating limits, not paperwork.
- Report deviations immediately. A short-duration deviation reported is a documented event; an unreported deviation discovered later becomes enforcement.

- Maintenance that affects permitted equipment must be coordinated with the Onsite Supervisor and the Verdun Sr. Regulatory Manager before work.

10.4 Wildlife, Vegetation, Landowner Property

- Cover tank hatches and openings that could trap birds. Mesh on stack vents.
- Check open pits, sumps, and trenches for trapped wildlife each shift. Provide escape ramps.
- Drive at lease-road speeds — slowing for cattle, deer, snakes, and other wildlife is required.
- Do not feed, capture, harass, or relocate wildlife. Report sick, injured, or dead wildlife to the Onsite Supervisor.
- Do not kill non-threatening snakes — let them move on.
- Respect landowner instructions — gates, livestock, route restrictions, hunting season access.
- Minimize ground disturbance and vegetation removal beyond what is needed for safe operations.

10.5 Protected Species

Verdun operates in areas with threatened and endangered species — lesser prairie-chicken, dunes sagebrush lizard, Texas hornshell, and others. The Migratory Bird Treaty Act protects most native birds. Your Verdun Contractor Sponsor will brief you on protected species concerns specific to your work area. If you encounter what may be a protected species, notify the Onsite Supervisor before proceeding.

11. Emergency Response



The First Five Minutes

1. Protect people — get to a safe location, upwind or crosswind.
2. Stop the work — shut down operations that could contribute or be affected.
3. Sound the alarm — verbal, air horn, radio.
4. Notify — Onsite Supervisor first; 911 for life-threatening events.
5. Muster and account — head count at the muster point.

11.1 Every Verdun Site Has an ERP

Each Verdun site has a site-specific Emergency Response Plan (ERP) covering local hazards, muster point, evacuation routes, alerting procedures, rescue equipment locations, and emergency contacts. You will be briefed on the ERP at orientation. Know:

- Site GPS coordinates (latitude / longitude) — for medevac.
- Muster point and the route to it from your work location, upwind and crosswind.
- Onsite Supervisor name and phone, nearest medical facility, EMS, fire.
- Wind direction at the start of your shift.
- Locations of fire extinguishers, eyewash, first aid, AED, SCBA, spill response cache.

11.2 Specific Scenarios

Spill

- Stop the source if safe. Contain at the source. Notify Onsite Supervisor immediately.
- Do not enter a hazardous atmosphere or unsafe area to stop a source. Call for help.

Fire

- Sound the alarm. Evacuate non-essential personnel to the muster point — upwind / crosswind.
- Call 911 for any fire beyond what can be safely extinguished with a portable extinguisher by trained personnel.
- Shut off the fuel source if safe. Activate fire suppression where installed.
- Do not approach a tank battery fire downwind.

Well Control Event

- Activate well control equipment per drilling/workover procedure (BOP, choke, kill).
- Evacuate non-essential personnel. Eliminate ignition sources. Establish exclusion zone.
- Notify the Verdun D&C leadership through the Onsite Supervisor immediately.

H₂S Release

- Move upwind or crosswind immediately. Do not investigate the source.
- Account for everyone at the muster point. Report missing personnel.
- Untrained rescue attempts kill rescuers. Do not enter an area in H₂S alarm without SCBA and authorization.

Medical Emergency

- Make the scene safe — don't become a victim.
- Provide first aid / CPR / AED per training.
- Call 911 for serious events. Provide the site GPS coordinates for medevac.
- Designate someone to meet emergency services at the gate.
- Clear vehicles and personnel from the helicopter landing zone (100-ft radius minimum) if medevac is inbound.
- Do not contact the worker's family directly — Verdun HR coordinates family notification.

11.3 Severe Weather

- Lightning within 10 miles — suspend work at height, on tall structures, near cranes/derricks. Take cover. Resume, only after 30 minutes of no strikes.
- Tornado warning — move to designated shelter. Do not shelter in portable trailers or vehicles.
- Flash flood — do not drive through standing water on lease roads. Move to higher ground.
- Hurricane (coastal areas) — site hurricane preparedness plan governs. Coordinate with the Production Manager.

12. Incident and Near-Miss Reporting

Report everything

If you have to ask whether to report something, report it. Verdun's standard is broad and inclusive. Over-reporting is welcomed; under-reporting is the problem.

12.1 What to Report

Every contractor reports the following on Verdun sites:

- Injury or illness — first aid through fatality.
- Near-miss — any event that could have caused injury, illness, or significant damage with different timing or circumstances.
- Hazard observation — conditions or behaviors that could lead to an incident.
- Stop Work event.
- Spill or environmental release — any size, any pathway.
- Vehicle incident — collision, near-miss, animal strike, property damage.
- Property or equipment damage.
- Fire or explosion.
- Well control event.
- Regulatory inspection, citation, or visit.
- Verdun Life-Saving Rule violation.

12.2 How and How Fast

- Verbal to the Onsite Supervisor immediately for any injury, spill, fire, well control event, regulatory contact, or LSR violation.

- Verbal to the Onsite Supervisor or your Verdun Contractor Sponsor the same shift for hazards, near-misses, and Stop Work events.
- Trench Safe entry coordinated by Verdun within 12 hours. You provide the information; Verdun enters it. Your input is essential — be specific, factual, and timely.
- OSHA reportable events: fatality within 8 hours; hospitalization, amputation, or loss of an eye within 24 hours. Verdun coordinates the notification.

12.3 Preserve the Scene

- Care for people first. Always.
- Secure the scene. Restrict access. Barricade if needed.
- Preserve evidence in place — do not clean up, move equipment, or alter conditions until investigation is complete, unless necessary for ongoing safety.
- Photographs, sketches, witness names — capture before memories fade.

12.4 Investigations

- Verdun investigates incidents using a Top-set method.
- If the workers involved are yours, Verdun typically asks your company to lead the investigation, with Verdun oversight and approval rights.
- You provide honest, factual statements. You cooperate fully. Verdun does not assign individual blame at investigation — the focus is system causes and system fixes.
- Corrective actions are SMART (Specific, Measurable, Achievable, Relevant, Timely) and tracked to completion.
- Moderate and Major risk-level investigations go through Verdun's Incident Review Board (IRB). Your management may be invited.

13. Consequences of Non-Compliance

Verdun's HSE expectations exist to protect people and the environment. Non-compliance puts workers — your workers and ours — at risk. Verdun responds proportionately and escalates where the behavior or the risk warrants it. Be clear about what we will and will not tolerate.

13.1 Escalation

Level	Behavior	Verdun Response
1. Coaching	Minor procedural gap; first observation of a deviation; honest mistake corrected on the spot.	Onsite Supervisor or Verdun Contractor Sponsor addresses with the worker. Documented in Trench Safe as an observation.
2. Formal Performance Gap	Repeated minor gaps; consistent procedural failures; pattern of poor JSAs or pre-job meetings.	Documented conversation between the Verdun Contractor Sponsor and your management. Tracked corrective action. Heightened Contractor Field Verification (CFV) frequency.
3. Mitigation Plan	Significant gaps in safety program execution; pattern of issues across multiple sites or scopes.	Your ISNetworld status moves to Yellow. A formal Mitigation Plan is required with named owners, compensating controls, and a closure timeline. HSE Director approval. Work continues under heightened oversight.
4. Removal of Worker	Verdun Life-Saving Rule violation; reckless behavior; failure to follow permit conditions; documented unsafe action.	The Onsite Supervisor or your Verdun Contractor Sponsor removes the specific worker from the Verdun site. The worker may be required to complete additional training before returning.
5. Removal of Crew or Stop Work on Scope	Pattern of LSR violations; willful disregard for Verdun expectations; failure of your supervision; repeat performance gaps.	Verdun stops the crew's work or removes the crew from the site. Your management is engaged. Resumption requires demonstrated correction and Verdun HSE Director approval.
6. ISNetworld Downgrade	Sustained or serious performance issues; failure to execute Mitigation Plan; safety incident with contractor causal factors.	Your company's ISNetworld status is downgraded — Yellow to Red — affecting your ability to bid or perform Verdun work. May affect your status with other operators using ISNetworld.
7. Contract Action	Major or repeated safety failures; willful violation of Verdun policy; serious incident with contractor at fault.	Verdun contracts may be suspended, modified, or terminated. Your company may be removed from Verdun's approved contractor list.

Some violations skip the escalation

Verdun reserves the right to remove a worker, stop a crew, or terminate a contract immediately — without progressing through the levels above — when the behavior or the incident warrants. Examples: fatality or serious injury caused by reckless behavior; willful violation of a Life-Saving Rule with clear understanding of the rule; falsification of safety

records (training, gas tests, inspections); covering up a reportable event; retaliation against a worker who reported a hazard or used Stop Work Authority.

13.2 Verdun's Authority

Every Verdun Onsite Supervisor, every Verdun Contractor Sponsor, has the authority to:

- Stop a contractor's work on a Verdun site at any time.
- Remove any contractor worker from a Verdun site at any time.
- Suspend a permit, JSA, or activity that does not meet Verdun's expectations.
- Require corrective action before work resumes.

These are not subjects for negotiation in the field. If you disagree with a Verdun decision on safety grounds, your company's management raises the matter through your Contractor Sponsor and the HSE Director — after the safety decision has been honored.

13.3 Non-Retaliation Cuts Both Ways

Verdun does not punish good-faith reporting, Stop Work Authority, or speaking up. We expect you not to either. A contractor manager or supervisor who punishes their worker for reporting a hazard, stopping work, or raising a concern is in violation of Verdun's expectations — and is itself a basis for escalation under §13.1.

14. Quick Contacts and Sign-Off

14.1 External Emergency Contacts

Contact	Number	When
911 / Local EMS / Fire	911	Life-threatening medical, fire, or hazardous release in progress.
National Response Center	1-800-424-8802	Oil, chemical, or hazardous substance release to the environment.
OSHA	1-800-321-OSHA (6742)	Workplace fatality (within 8 hr); hospitalization/amputation/eye loss (within 24 hr).