APPENDIX N. SAMPLE SPILL PREVENTION, CONTROL, AND COUNTERMEASURE RESPONSE PLAN

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

UINTAH AND DUCHESNE COUNTIES, UTAH

JULY 2010

Prepared for:

GASCO PRODUCTION COMPANY
Denver, Colorado

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

UINTAH AND DUCHESNE COUNTIES, UTAH

JULY 2010

Prepared for:
GASCO PRODUCTION COMPANY
8 Inverness Drive, Suite 100
Denver, Colorado 80112
(303) 483-0044

Prepared by:
LT ENVIRONMENTAL, INC.
4600 West 60th Avenue
Arvada, Colorado 80003
(303) 433-9788

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APPENDICES

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

GASCO PRODUCTION COMPANY

UINTAH AND DUCHESNE COUNTIES, UTAH

PROPERTY OWNER:

Gasco Production Company
8 Inverness Drive, Suite 100
Englewood, CO 80112

PROPERTY ADDRESS:

Uintah and Duchesne Counties, Utah

IN THE EVENT OF A SPILL

GO DIRECTLY TO APPENDIX A

MANAGEMENT APPROVAL AND REVIEW

Owner/Operator Responsible for facilities:

Gasco Production Company
8 Inverness Drive, Suite 100
Englewood, CO 80112

This Spill Prevention, Control, and Countermeasure (SPCC) Plan (Plan) will be implemented as herein described. In addition, necessary manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged is hereby committed.

Signature: Roger Knight

Designated person accountable for oil spill prevention at the facilities:

Name: Roger Knight

Date: 07/14/2010

Title: Environmental, Health, and Safety Supervisor

LOG OF PLAN REVIEW AND AMENDMENTS

Non-Technical Amendments

Non-technical amendments are not required to be certified by a Professional Engineer.

Examples of non-technical amendments include, but are not limited to, phone numbers, name changes, or any non-technical text change(s).

Technical Amendments

Technical amendments must be certified by a Professional Engineer.

Examples of technical amendments include, but are not limited to the following changes: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacements, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes in product or service; and revision of standard operation or maintenance procedures at a facility.

An amendment made under this section will be prepared within six (6) months of the change and implemented as soon as possible but not later than six (6) months following preparation of the amendment.

Management Review
Management will review this SPCC Plan at least once every five (5) years and document the review on the form below.

Review Date	Management Signature	Reason for Amendment and Affected Section(s)	Technical/ Non-Technical	P.E. Certification (Y/N)

REGULATORY CROSS REFERENCE

Citation	Topic	Section
40 CFR 112.7(a)	General requirements; discussion of facilities' conformance with rule requirements; deviations from Plan requirements; characteristics of facilities that must be described in the Plan; spill reporting information in the Plan; emergency procedures.	1.0, 2.0, 3.0, 5.0
40 CFR 112.7(b)	Direction and quantity of flow.	6.0
40 CFR 112.7(c)	Secondary containment.	7.0
40 CFR 112.7(d)	Deviations and contingency planning.	8.0, Appendix C
40 CFR 112.7(e)	Inspections, tests, and records.	9.0
40 CFR 112.7(f)	Employee training and discharge prevention procedures.	10.0
40 CFR 112.7(g)	Security (excluding oil production facilities).	Not Applicable
40 CFR 112.7(h)	Loading/unloading (excluding offshore facilities).	11.0
40 CFR 112.7(i)	Brittle fracture evaluation requirements.	12.0
40 CFR 112.7(j)	Conformance with state requirements.	13.0
40 CFR 112.9(a)	General and specific requirements.	1.0 – 5.0
40 CFR 112.9(b)	Oil production facility drainage.	6.0
40 CFR 112.9(c)	Oil production facility bulk storage containers.	4.0, 7.0, 9.0
40 CFR 112.9(d)	Facility transfer operations, oil production facility.	9.0, 11.0
40 CFR 112.20 Appendix C	Substantial harm criteria.	Appendix D

1.0 GENERAL APPLICABILITY [40 CFR 112.7(a) and 40 CFR 112.9(a)]

This Spill Prevention, Control, and Countermeasure (SPCC) Plan (Plan) has been prepared for Gasco Production Company (GPC) located in Englewood, Colorado for tank batteries located in Uintah and Duchesne counties, Utah. A list of all tank batteries under this Plan is included in the Appendix D index at the back of this Plan.

This Plan has been prepared in accordance with 40 CFR 112.7 and 40 CFR 112.9 as applicable for onshore production facilities. All onshore production facilities that store 1,320 gallons of petroleum, oils, or lubricants (POL), on site in containers 55 gallons or greater are subject to these regulations.

This Plan is organized as a field SPCC Plan with site-specific attachments. Sections 1.0 through 13.0 and Appendices A, B, and C apply to all GPC tank batteries located in Uintah and Duchesne counties. Site-specific information for each location has been included in Appendix D. The following site-specific information for each tank battery is presented in Appendix D:

- Professional Engineer Certification;
- Management Approval and Review;
- Substantial Harm Criteria Checklist;
- Secondary Containment Calculation; and
- Facility Diagram.

2.0 EMERGENCY CONTACT INFORMATION [40 CFR 112.7(a)(3)(vi)]

Pumpers are responsible for discharge prevention at their respective tank batteries. Contact information for GPC and emergency response contractors is provided in Appendix A, Table A-1. Contact numbers for regulatory agencies are provided in Appendix A, Table A-2. A Spill Response Notification Form is provided in Appendix B.

In the event of a release, the pumper should contact his Production Superintendant, who is responsible for contacting the Production Foreman. If the Production Superintendant is not available, the pumper should contact the Production Foreman. The Production Foreman is responsible for contacting the Environmental, Health, and Safety (EHS) Supervisor. In the event that the Production Superintendant and Production Foreman are not available, the pumper should notify the EHS Supervisor directly.

3.0 FACILITY LAYOUT [40 CFR 112.7(a)(3)]

All tank batteries are located in Uintah and Duchesne counties, Utah. The physical layout of each site consists of aboveground storage tanks, oil treatment equipment such as separators, and other ancillary equipment associated with each tank battery. Tanks may contain natural gas, crude oil, condensate, produced water, diesel, motor oil, drilling fluids, methanol, well treatment chemicals, or associated exploration and production wastes. Facility diagrams and legal descriptions are provided in Appendix D (Site-Specific Information). Site-specific information for each facility, regarding onsite containers, containment volumes, and content, are also provided in Appendix D.

A description of the oil-related storage equipment typically found at tank batteries is provided in the following sections.

3.1 TANKS AND CONTAINERS

Aboveground storage tanks (including drums) with capacities of 55 gallons or greater are addressed in this Plan in accordance with the requirements of 40 CFR 112.

Underground or buried storage tanks are not regulated under the requirements of 40 CFR 112, except to be shown on site diagrams where applicable, unless the owner or operator of the facility stores 42,000 gallons or greater of POL in underground storage tanks.

Partially buried or bunkered storage tanks (including open top tanks buried to the ground surface) are considered aboveground storage tanks for the purpose of these regulations and are addressed in this Plan. Several of the sites have partially buried closed top fiberglass or concrete tanks. These partially buried tanks are considered aboveground storage tanks and containment must be constructed to contain a minimum of the aboveground capacity of these containers plus sufficient freeboard to contain precipitation. Any open top tank is required to have containment constructed to contain the entire contents of the tank plus sufficient freeboard for precipitation.

Production tanks, **pit tanks, and water tanks** are used for the temporary storage of collected oil and water. Production tanks generally contain separated oil, condensate, or a mix of water and oil. Pit tanks or water tanks often contain separated water and may contain oil drips/leaks from separators and equipment.

Separators, knockout tanks, and heater treaters are used to separate oil, water, and natural gas. The requirements of 40 CFR 112 apply to these process tanks. Although these process tanks rarely full, containment should be designed in accordance with the shell capacity of these tanks.

Methanol and treatment chemical tanks/drums are not required to be in containment by this Plan. Methanol and treatment chemicals are not considered POL. However, as a best management practice, containment is recommended.

Blowdown tanks are used at facilities where condensate collects in gas lines (typically at low points in the gas line). Because blowdown tanks collect condensate, which can be a mix of oil and water (unless the production zone/formation produces water only), blowdown tanks with a capacity of 55 gallons or greater are required to be kept in containment.

Diesel and motor oil tanks/drums associated with pumping units and generators are required to be placed in containment if the containers have a capacity of 55 gallons or greater. As an alternative to containment, 30-gallon drums of diesel and motor oil can be used.

Solvents tanks/drums, including those used for xylene and Stoddard solvent, are often stored at larger tank batteries with shops. These items are considered POL and must be kept in containment if containers have a capacity of 55 gallons or greater.

Temporary tanks are often installed during the initial production stages of a well. During the initial production stage, produced water quantity can be much greater than during normal or later stages of production. In order to receive this additional produced water, frac tanks or additional steel tanks may be temporarily installed at a site. During the period while these tanks are installed on site, adequate secondary containment must be provided. Temporary tanks that will be removed within 6 months of the startup of a new well have not been included on the drawings. If the tanks remain onsite for more than 6 months, they will be included in this Plan and the site-specific portion of the Plan recertified.

3.2 CONTAINMENT

Lined containment is used in some locations where new tank batteries have been installed. Lined containment prevents spills or leaks from tanks, drums, or equipment from absorbing into the soil. All spills or leaks, including drips at load lines and leaks on valves, gauges, or other associated equipment, must be cleaned up upon discovery and repaired as soon as practicable.

Unlined containment is used at most locations. Unlined containment consists of an earthen berm that has been built up around the tank battery. Spilled material can absorb into the soil; however, it will be contained within the site boundary. All contaminated soil must be removed and treated or disposed of in accordance with appropriate regulatory requirements.

Portable containment is generally used for drums or elevated storage tanks of methanol, diesel, motor oil, or treatment chemical. The drum or tank is generally set within the containment.

Excavated containment is often used for pit tanks where compressors or other equipment would require an ecology line or dump line at ground level. Containment is created by excavating the ground surrounding the tank to provide a below-grade, unlined earthen containment. Excavated containment must be shored or sloped to prevent the sides of the excavation from caving or washing inward.

Housing can be provided as secondary containment for separators. The base of the housing may not be compromised where liquids can leak out at the base of the doors.

3.3 PIPING

Piping was installed at each facility running from the well head(s) to the separator or treatment unit for the well(s). From the separator or treatment unit, piping is connected to the condensate, oil, and water tanks. Piping is used to transport natural gas associated with production from the treatment units to the meter house at locations where gas is sold, and/or to onsite flares. All water and condensate piping is located aboveground and is insulated. Natural gas lines are buried after the gas is metered (sales line). All aboveground piping is included on the facility diagrams. Underground piping (gas sales lines) is not shown on the facility diagrams, as it would be difficult to represent the exact location of buried piping.

4.0 TANK AND FLOW LINE CONSTRUCTION [40 CFR 112.9(c)(1) and (4)]

All containers used for the storage of POL must be constructed of materials compatible with the materials that will be stored in each container. Storage tanks are cylindrical in shape, and constructed of steel to American Petroleum Institute (API) specifications. Tanks are painted to inhibit corrosion. The total volume of the tanks is sufficient for normal inflow rates considering the time between lease operator visits. Tanks are equipped with equalizer lines of adequate size for normal inflow rates. Each oil tank is equipped with an over-pressure or relief valve (vent) to protect against excessive internal pressure.

Flow lines are designed for material compatibility, are able to withstand anticipated operating pressures, are protected from corrosion, and have sufficient insulation. Any buried gas lines are buried a minimum of 3 feet on crop lands to prevent external damage.

Collection rates should be measured upon installation to ensure that production and water tanks are of adequate size to prevent overflow in the event that the pumper is not able to perform regularly scheduled rounds. In some cases, at newer installations, a second holding tank may be installed with oil/water level equalizing lines. Oil/water level equalizing lines will allow the first tank to overflow into the second tank if water levels reach the top of the first tank. Each tank is equipped with vacuum protection (venting) adequate to prevent container collapse during a pipeline run or oil transfer from the container.

5.0 SPILL PREVENTION, RESPONSE, AND CLEANUP [40 CFR 112.7(a)(3)]

5.1 SPILL PREVENTION [40 CFR 112.7(a)(3)(ii) and 40 CFR 112.7(a)(3)(iii)]

The following sections describe potential spill hazards associated with each element of the equipment. In the event of an overflow or rupture, spills and overflows must be contained and cleaned up upon discovery. The cause of any spills, leaks or overflows must be identified and repaired as soon as practicable and processes modified if the release is process related.

Specific information on direction of flow can be found in Appendix D (Site-Specific Information). Spill rates are highly variable and dependent upon the type of equipment failure, operating pressures, and current production rates (which change over time and may be programmed on an intermittent basis). In the event of a release, the flow rate would vary, up to the total volume of the largest container stored on site over a one-minute period (catastrophic tank rupture).

5.1.1 Valves

Valves can be moved into the open position by cattle. This occurrence can be prevented by removing valve handles or locking valves when livestock are present. Sites that are located in cattle grazing areas are enclosed by fencing to prevent these occurrences.

5.1.2 Loading Procedures

Small drips at the terminus of the load line are common. These drips should be prevented with the implementation of valve maintenance and careful loading procedures by crude oil haulers. Pumpers should report careless or inadequate hauling procedures to their supervisor. Catch buckets or drip pans can be installed to collect such drips from the load line. However, because this practice can result in overflow of the drip pan, especially during storm events, drip pans must be checked and emptied regularly.

Aboveground storage tanks at the sites are currently surrounded by metal or earthen berms. Load line valves and drain valves are located at the base of the aboveground steel tanks. In the event of a failure of the load line valve or drain line valve, the entire content of the tank would drain. Therefore, it is recommended that load line connections for all tanks be located within the secondary containment. Any spill generated from transfer of liquids, regardless of the spill location, must be cleaned up upon discovery and the cause of the spill determined. In the event of a leaking valve, the valve will be repaired as soon as practicable.

To minimize spills and leaks at the system, haulers are present at all times during the loading process.

5.1.3 Removing Excess Water from Production Tanks

Releases can occur if the drain line valve from the production tanks is left open after draining excess water from the bottom of the production tanks prior to sale of the product. If left open too long, condensate or oil may be released from the drain line to the environment. This event should be prevented by careful observation during such operations. Pumpers must not leave a production site when draining water from production tanks.

5.1.4 Tank Overflow

Overflows may occur if tank capacity is not sufficient and product levels are not regularly checked. At many production sites, two tanks are installed and connected so that the second tank will receive production when the first tank is full.

Additionally, tank overflows are more likely during the initial stages of production from a well. Special care should be exercised during this time as production rate is higher and may be more variable.

5.1.5 Tank Leaks or Ruptures

Tank leaks or ruptures are an uncommon cause of spill events. Leaks should be prevented by regular inspections for corrosion, seam failure, and gasket integrity at the clean-out access plate. Ruptures may be associated with lightening strikes (tanks should be grounded to minimize lightening damage) or explosions (smoking and other ignition sources must be kept away from tank batteries).

5.1.6 Separators, Knockout Tanks, and Heater Treaters

Separators, knockout tanks, and heater treaters are pressure vessels, and releases are most commonly associated with a "pop-off" valve. This may result in a mist sprayed over a wide area rather than a fluid flow into the general vicinity of the vessel.

There are four safety prevention features on each separator. Three of these features are automatic, and one is manual. Should the pressure on the system exceed the safe working capacity of the unit, two pressure relief valves and a high/low switch would activate. The high/low switch would shut the system down and shut in the well. In the event of a dramatic pressure drop due to a rupture, the high/low switch would again activate and shut off the system. The fourth safety feature is the manual choke valve, which can be used to stop any liquid from entering the separator.

5.1.7 Flow Lines and Piping [40 CFR 112.9(d)(3)]

Flow lines and piping at production sites can be sources for releases. The quantity and rates of such events will vary according to failure mode, operating pressures, current production rates, and duration of the release.

All production pipelines are located above ground and are equipped with insulation. Aboveground piping and fittings at production sites are regularly inspected for signs of corrosion and leakage.

5.2 RESPONSE [40 CFR 112.7(a)(3)(iv)]

In the event of a leak or overflow, all valves will be closed and the system shut down to prevent additional releases while response procedures are initiated. When a spill occurs outside of the containment, or in the event of a large or catastrophic release, personnel should take the necessary precautions to contain the spill to the property.

Immediate notification to designated GPC personnel is the key to effective spill and release containment and control. Such notification also allows the company to promptly report a spill event to appropriate government agencies, in accordance with applicable regulatory requirements.

Upon discovery, all spills and releases of natural gas, crude oil, condensate, produced water, drilling fluids, methanol, well treatment chemicals, or associated wastes must be immediately reported to the Production Superintendant. If the Production Superintendant cannot be reached the pumper should contact the Production Foreman. The Production Superintendant is responsible for notifying the Production Foreman who is responsible for notifying the EHS Supervisor. During any event where the Production Superintendant and Forman cannot be reached, the EHS Supervisor should be contacted directly. In the event that the EHS Supervisor cannot be contacted, notification shall be made to the Vice President of the company. Contact numbers are included in the Internal Emergency Notifications table located in Appendix A (Table A-1).

The EHS Supervisor is responsible for mobilizing appropriate spill response, containment, and control manpower and equipment in accordance with the Contingency Plan presented in Appendix C of this Plan.

In the event a spill impacts surface water, the EHS Supervisor is responsible for the initial spill report, by telephone, to the National Response Center, immediately after discovery of the spill, as described on Table A-2 included in Appendix A. Spills may also be reported to the National Response Center at the following web address: http://www.nrc.uscg.mil/reporttxt.htm. The EHS Supervisor must also complete the Incident Report forms provided in Appendix B and report to state and local agencies as appropriate.

Any release that could potentially affect the waters of the State must be reported to the Utah Water Quality Division. This includes areas where groundwater is shallow.

In the occurrence of a major undesirable event, the Utah Division of Oil, Gas, and Mining (UDOGM) must be notified immediately (801-538-5340, after hours 801-243-9466). Minor undesirable events can be reported the following morning. A major event is defined by the UDOGM is an event meeting one or more of the descriptions below:

- Leaks, breaks or spills which result in the discharge of more than 100 barrels of liquid;
- Equipment failures or accidents which result in the flaring, venting, or wasting of more than 500 million cubic feet of gas;
- Any fire which consumes the volumes shown above;
- Any spill, venting, or fire, regardless of the volume involved, which occurs in a sensitive area stipulated on the approval notice of the initial Application for Permit to Drill (APD) for a well, e.g., parks, recreation sites, wildlife refuges, lakes, reservoirs, streams, urban or suburban areas;
- Each accident which involves a fatal injury; or
- Each blowout or loss of control of a well.

Complete written reports of undesirable events should be submitted on the Utah Division of Oil, Gas, and Mining Form 9, Sundry Notices and Report on Wells or by using the division's Incident Report Form, as soon as conclusive information is available.

5.3 CLEANUP AND DISPOSAL [40 CFR 112.7(a)(3)(v)]

The EHS Supervisor will handle clean up and disposal of spilled materials in accordance with regulatory requirements. Exploration and production waste is not considered a hazardous waste, therefore, oil-contaminated soil may be disposed of at a permitted landfarm, or it may be taken to a permitted landfill. [Note: The landfarm or landfill will need to be contacted to ensure that the material can be accepted.]

If assistance is needed, a response contractor (Appendix A, Table A-1) will be called. In the event the material can be salvaged, the vacuum truck contractor will be notified.

6.0 FLOW DIRECTIONS [40 CFR 112.7(b)]

The surface water runoff directions shown on the diagrams included in Appendix D are based on the topography surrounding each site. The sites are located in Uintah and Duchesne counties, Utah. Two sites are located on private property and the remaining sites are located on Federal land [Bureau of Land Management (BLM) land]. The surrounding topography is varied and sites are generally located on rangeland.

The ground surrounding all sites is leveled at the time of installation to provide a stable base for the equipment. The even surface also prevents runoff from the site. In most locations, water pools at the site from surrounding areas. Given that the sites are leveled, it is unlikely a spill or leak would migrate from the area.

All sites are located in the Green River Basin which is part of the Upper Colorado River Basin. Surrounding water courses include drainages and washes that lead to the Green River. The approximate distance and direction to the nearest watercourse is included in each site-specific table in Appendix D.

7.0 CONTAINMENT [40 CFR 112.7(c) and 40 CFR 112.9(c)(2)]

Each site must have containment sufficient to prevent spills from leaving the property. Berms are required around all tanks, sufficient to contain the shell capacity of the largest container located within the containment plus sufficient freeboard for precipitation. The rainfall from a 25-year, 24-hour storm in Roosevelt, Utah is 2.0 inches. Construction of new containments or berms, or repairs to existing berms should be completed with sufficient allowance for a minimum of 2.0 inches of precipitation. Corrective actions are provided on the Professional Engineer Certification Page for each facility included in Appendix D. For any containment with a capacity under 110 percent of the largest container within the berm, a corrective action is required. The Professional Engineer Certification for each facility is contingent upon completion of these corrective actions within 6 months of the facility's plan certification date.

Containment calculations are presented in Appendix D (Site-Specific Information). For earthen berms, measurements were taken from the inside of the berm at mid-slope. For facilities with odd shaped (not rectangular) berms, an equivalent length and width are included in the table.

The formula for calculating the empty containment volume is as follows:

$$(H)*(L)*(W1)$$

H=Height
L=Length
W=Width

The corrected volume presented in the table on the Tank Information and Containment Calculations page for each facility included in Appendix D, is equal to the volume displaced by raised pads or tanks other than the largest tank located within the berm.

Containment is provided for GPC production and water tanks by either an earthen or metal berm. Containment for all separator units is provided by separator housing and releases due to tank leaks or ruptures will be immediately contained by the separator house. Because these structures enclose the separator units, over 100 percent containment is provided and additional containment volume for precipitation is not required. Additional calculation for the separator houses is not provided in the calculations table provided for each facility in Appendix D.

Containment or spill cleanup materials must be available at the loading area. Drain pipes should be located within the containment, or drip pans should be made available under load lines that extend outside of containment. Vacuum truck operators are equipped with secondary containment materials to clean up the majority of small leaks, spills, or drips that might occur during unloading of the tanks.

8.0 DEVIATIONS [40 CFR 112.7(d)]

This Plan does not deviate from the SPCC Plan requirements of 40 CFR 112.

An Oil Contingency Plan has been prepared and is included in Appendix C as a best management practice.

9.0 INSPECTIONS AND TANK TESTING [40 CFR 112.7(e) and 40 CFR 112.9(d)]

Annual inspections will be conducted by the EHS Supervisor or his designee, and will be kept on file for three years. Additionally, pumpers and roustabouts, as part of their regular routine, are responsible for inspecting production facilities for compliance with this Plan. The SPCC Inspection Form is located in Appendix B of this Plan. In the event of a leak, the line or tank will be tested after repairs have been made.

Pressure tests are conducted in response to rapid production drop-offs as indicated by gas meter readings or production tank measurements. Flow line routes are walked during regular site visits and during the annual SPCC inspection process.

When necessary, tank testing techniques should be performed in accordance with the Steel Tank Institute *Standard for Inspection of Aboveground Tanks* (SP001).

Facility personnel must inspect the following items and equipment on a regular basis:

- Facility containment and drainage;
- Facility bulk storage containers;
- Facility piping;
- Facility transfer operations; and
- Pumping equipment.

9.1 FACILITY CONTAINMENT AND DRAINAGE INSPECTIONS [40 CFR 112.9(c)(3)]

9.1.1 Berms/Rainwater

Earthen berms will be inspected for adequate capacity, erosion, and oil or water accumulation. Steel berms will be inspected for damage including corrosion of supports and structural damage. Concrete berms and portable containment will be inspected for leaks, cracks, or other signs of failure. Accumulations of liquid will be removed from bermed areas. If the liquid is from one of the tanks, the source will be found and repaired. Rainwater that collects in portable or lined containment will generally evaporate. If a substantial amount of precipitation collects within portable or lined containment, the vacuum truck service will be called to remove the precipitation to maintain sufficient capacity of the containment. Any oil that accumulates on the surface of the precipitation will be collected and disposed in accordance with regulatory requirements or recycled.

9.1.2 Ditches and Waterways

Drainage ditches in and around the facility, irrigation ditches, roadside ditches, watercourses, ponds, etc. will be inspected for oil accumulations on a regular basis. If evidence of a spill is detected, the source will be found and stopped. An earthen dam or other suitable containment will be constructed, and the oil will be removed by vacuum truck or skimming. The material will be transported to a permitted disposal facility.

9.2 FACILITY BULK STORAGE CONTAINERS [40 CFR 112.9(c)]

9.2.1 Tanks

All liquid storage tanks (including crude oil, saltwater, methanol, fuel, treatment chemicals, lube oil, etc.), except fresh water tanks, and associated piping will be visually inspected for leaks, overflows, and signs of potential problems. Special emphasis will be placed on the inspection of bottom seams, patches, flanges, piping connections, sight glasses, and other openings. The foundation for each tank will also be inspected. Washout and animal holes can cause the foundation to shift and lead to the unstable installation of a tank.

9.2.2 Line Heaters, Separators, Knockout Tanks, and Heater Treaters

Line heaters, separators, knockout tanks, and heater treaters should be visually inspected. Valves, fittings, inspection plates, and sight glasses should be carefully inspected for leaks. Vents on glycol units should be inspected for excessive liquid carryover.

9.2.3 Pressure Relief Valves

Pressure relief valves on equipment should be checked for leaks, evidence of leaks, and any signs of failure.

9.3 FACILITY TRANSFER OPERATIONS [40 CFR 112.9(d)]

9.3.1 Valves

All flange joints, valve glands and bodies, drip pans, pipe supports, and bleeder and gauge valves will be inspected on a regular basis for leaks. Valves should be in their proper position and locked or sealed, as appropriate.

9.3.2 Flow lines and Piping

Flow lines, injection lines, gathering lines, gas lift lines, and other piping in and around batteries, separation facilities, saltwater handling facilities, etc. will be inspected for leaks and evidence of spills. Lines not visible from the road will be walked periodically.

9.3.3 Drip Pans

The liquid level in drip or drain pans should be checked and emptied as necessary. Sufficient freeboard must be allowed for precipitation. In some instances, closed top drip pans may be more appropriate.

9.4 PUMPING EQUIPMENT

Lube oil storage tanks and the piping systems should be inspected. This includes visually inspecting for leaks around tanks, pumps, and fittings on the piping or tubing.

10.0 PERSONNEL TRAINING [40 CFR 112.7(f)]

Oil handling personnel are trained in the following SPCC related topics:

- Spill control equipment;
- Equipment operation and maintenance;
- Containment, vessel, tank, and piping inspection and maintenance;
- Spill response, containment, and clean-up;
- Company policies on reporting and responding to spills; and
- The contents of this Plan, including site-specific information.

The EHS Supervisor provides SPCC compliance training to all oil handling personnel on an annual basis. Additional tailgate sessions are held as needed before and during certain jobs to review spill potential, necessary precautions, and appropriate responses. An example SPCC training record form is included in Appendix B.

Pumpers are responsible for discharge prevention at their respective facilities and are responsible for reporting operational, maintenance, and spill prevention issues to facility management.

11.0 LOADING RACK/AREA CONTAINMENT [40 CFR 112.7(h)]

Loading racks are not present at any of the facilities.

Vacuum truck service operators remain on site during loading of the product. Vacuum truck service operators remain in visual contact of the equipment at all times. The operator is responsible for inspecting all connecting lines for leaks and drips prior to departure.

12.0 BRITTLE FRACTURE REQUIREMENTS [40 CFR 112.7(i)]

If a field constructed container undergoes a repair, alteration, reconstruction, or change in service that might affect the risk for discharge or failure due to brittle fracture or other catastrophe, the container must be evaluated for the risk of failure due to brittle fracture or other catastrophe. This evaluation may be performed using hydrostatic or pressure testing. If necessary, GPC must take the appropriate action to repair or replace the container. There are no field-constructed containers at any of the tank batteries.

13.0 CONFORMANCE TO OTHER REQUIREMENTS [40 CFR 112.7(j)]

Tank construction and operation must conform to state and local requirements, including all applicable Uniform Fire Code (UFC) regulations and local fire codes.

Tank battery construction and containment must be constructed and operated in accordance with the UDOGM Rules and Regulations, and BLM requirements. Site security diagrams have been included as part of this Plan.

APPENDICES

APPENDIX A

TABLES

TABLE A-1

INTERNAL EMERGENCY NOTIFICATIONS

Production Superintendent – Jesse Duncan
Cell Phone..... (435) 828-1221
Home..... (435) 722-0150

Production Foreman – Scott Duncan
Cell Phone..... (435) 823-4800
Home..... (435) 454-3032

EHS Supervisor – Roger Knight
Direct Office. ..... (303) 996-1803
Cell Phone..... (720) 810-3850

V.P. Operations – Chuck Wilson
Direct Office. ..... (303) 966-1801
Cell Phone..... (720) 530-1057

EMERGENCY RESPONSE CONTRACTORS

Jake Huffman Enterprises, Backhoe: Earthwork
Office ..... (435) 823-2261

Nebecker Trucking, Water Services
Office ..... (435) 823-6157

Dennis Jensen, General Services
Office ..... (435) 823-6590

TABLE A-2

NOTIFICATION OF OUTSIDE PARTIES, PUBLIC SAFETY OFFICIALS, AND GOVERNMENT AGENCIES

PUBLIC SAFETY NOTIFICATION

Fire/Police/Rescue. 911

Uintah Sherriff Business Office..... (435) 789-2511
Or .....(435) 781-5409
24 Hours.....(435) 789-4222

Duchesne County Sheriff's Department ..... (435) 738-0196
Or .....(435) 722-4444

Uintah Fire District, Jeremy Raymond
Office .....(435) 781-4964
Cell Phone.....(435) 828-6541

Duchesne County Fire & Emergency Management ..... (435) 738-1181

Hospital

Ashley Regional Medical Center..... (435) 789-3342
150 West 100 North
Vernal, UT 84078

GOVERNMENT AGENCY NOTIFICATIONS – VERBAL

National Response Center.....(800) 424-8802
(24 hr/day-7 days/week)

U.S. Environmental Protection Agency Region 8
Emergency Hotline.....(800) 227-8917
or.....(303) 312-6312

Utah Department of Environmental Quality, Division of Water Quality
(Spill Reporting Line - 24 hr/day-7 days/week) .....(801) 536-4123

Utah Division of Oil, Gas, and Mining
Phone.....(801) 538-5340
After Hours (major undesirable events only).....(801) 243-9466

TABLE A-2 (Continued)

NOTIFICATION OF OUTSIDE PARTIES, PUBLIC SAFETY OFFICIALS, AND GOVERNMENT AGENCIES

GOVERNMENT AGENCY NOTIFICATIONS – VERBAL

Local Emergency Planning Committee (LEPC)

Uintah County
Mechelle Miller, Office of Emergency Mgmt.
152 East 100 North
Vernal, Utah 84078
Phone..... (435) 781-5466

Duchesne County
Mike Lefler, Director and Chairman
P.O. Box 228
Duchesne, Utah 84021
Phone..... (435) 738-1181
Mobile..... (435) 822-2417

GOVERNMENT AGENCY NOTIFICATIONS – WRITTEN

Utah Department of Environmental Quality
P.O. Box 144870
Salt Lake City, Utah 84114-4870

Utah Division of Oil, Gas, and Mining
P.O. Box 145801
Salt Lake City, Utah 84114-5801

APPENDIX B

FORMS AND CHECKLISTS

SPILL RESPONSE NOTIFICATION FORM
GASCO PRODUCTION COMPANY

Reporter's Last Name:_____ First:_____ M.I.:_____
Reporter's Title/Position:_____

INCIDENT DESCRIPTION

Date and Time of Discharge:_____

Material Discharged:_____

Quantity Discharged (with units):_____

Container Type (Container Failure?):_____

Material Released in Water? If so, quantity (include units):_____

Media Affected: Soil_____ Water_____ Other (list)_____

Spill Location:_____

Nearest City:_____

Source and Cause of Incident:_____

Responsible Party's Name:_____

Responsible Party's Address / Phone:_____

IMPACT
Number of Injuries:_____ Number of Deaths:_____

Were there Evacuations:_____ (Y/N)? If yes, the number of people evacuated:_____

Was there any damage:_____ (Y/N)? If yes, describe damage including the medium affected and the approximate dollar amount of damage. (Be complete):_____

SPILL RESPONSE NOTIFICATION FORM (Continued)
GASCO PRODUCTION COMPANY

RESPONSE ACTION

Actions taken to Correct, Control, or Mitigate Incident:_____
_____
_____
_____
_____

CALLER NOTIFICATIONS

___National Response Center ___Fire/Rescue

___EPA ___Hospital

___State Agency ___Other (list) _____

RESPONSE CONTRACTOR

List names and phone numbers of spill response contractors contacted:_____
_____
_____
_____
_____
_____

ADDITIONAL INFORMATION

Any information about the incident not recorded elsewhere in the report?:_____
_____
_____
_____
_____
_____
_____
_____
_____

NOTE: DO NOT DELAY NOTIFICATION (INTERNAL OR EXTERNAL) PENDING COLLECTION OF ALL INFORMATION.

SPCC ANNUAL INSPECTION FORM

FACILITY INFORMATION:

Name:_____
Location:_____

INSPECTION DATE: _____ **INSPECTED BY:**_____

CONDITION OF:

STORAGE AREAS/TANKS

Bulging or over pressured tanks/drums?	Yes	No
Tanks/drums rusted/eroded/damaged?	Yes	No
Evidence of leaks from tanks/barrels, pipes or valves?	Yes	No
Staining on tanks/barrels?	Yes	No

Comments:_____

STORAGE CONTAINMENT

Standing liquid in containment/storage area?	Yes	No
Evidence of spills in containment/storage areas?	Yes	No
Storm water present in containment/storage area?	Yes	No
Sheen on storm water in containment/storage area?	Yes	No

Comments:_____

LOADING AND UNLOADING AREA

Evidence of spills in the loading/unloading area?	Yes	No
Storm water present in containment/storage area?	Yes	No
Sheen on storm water in containment/storage area?	Yes	No

Comments: _____

SECONDARY CONTAINMENT

Erosion of containment?	Yes	No
Containment damaged?	Yes	No
Containment adequate for volume of largest tank/barrel/container?	Yes	No
Sheen on storm water in containment/storage area?	Yes	No

Comments:_____

SECURITY MEASURES: (E&P facilities exempt)

Does the facility need security?	Yes	No
Does the facility have lighting?	Yes	No
Does the facility have fence?	Yes	No
Does facility have gate?	Yes	No

Comments:_____

_____

_____

IF THERE HAS THERE BEEN CHANGE IN THE DESIGN, CONSTRUCTION, OPERATION OF THE FACILITY, THE SPCC PLAN MUST BE REVISED WITHIN SIX (6) MONTHS OF THE CHANGE.

Date of change: _____
Date SPCC Plan needs to be updated:_____

Diagram of facility, facility changes if needed

PERSONNEL SPILL PREVENTION TRAINING LOG

GASCO PRODUCTION COMPANY

(Oil-handling personnel must be trained at least once a year in the prevention of oil discharges; discharge procedure protocols; applicable pollution control laws; general facility operations; and the contents of this Plan.)

SIGN IN SHEET

TOPICS DISCUSSED:_____

(Note: Required topics must include the facility SPCC Plan.)

NAME (please print)	COMPANY/POSITION	TELEPHONE/EXT.
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
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23.		
24.		
25.		
26.		

Instructor: _____Date:_____

APPENDIX C

OIL CONTINGENCY PLAN

OIL CONTINGENCY PLAN

SPILL RESPONSE GUIDELINES

Procedures to be observed during any spill response:

A. Implement spill-reporting procedures.

B. Do not smoke and remove possible ignition sources.

C. Restrict access to the spill area by roping or barricading the entire spill area and establishing one easily controlled point of entry.

D. Establish reliable communication between persons entering the spill area and those remaining outside.

E. Establish a "buddy system" and rescue mechanism.

F. Unless the spill involves a known substance, approach with the assumption that the material is extremely hazardous**.**

G. Always approach a spill site from upwind with a predetermined escape route established.

H. If unidentified fuming liquids or gases are present, do not approach the area without assistance or without a breathing apparatus.

I. Avoid contact with the spilled material.

J. Use construction equipment to form temporary dikes or barriers to prevent spill movement toward any waterway. If spill enters waterway, use oil booms to contain slick. Use skimmers and absorbent materials to remove.

K. Use vacuum truck to pick up free product in containment berm surrounding oil production tanks.

L. Excavate all petroleum-contaminated soil. Petroleum-contaminated soils are to be remediated on site, or hauled to a commercial land treatment facility.

TECHNIQUES FOR CONTROLLING OIL DISCHARGES (LAND & WATER)

PURPOSE

In spite of precautions taken, oil discharges can occur. Since the location and magnitude of discharges can vary greatly, this section was written to furnish general guidelines and usable techniques for containment of cleanup operations.

COUNTERMEASURES

Upon discovery of an accidental discharge, the first action taken should be safeguarding of life and property. The next step should be finding the source of discharge and stopping additional loss of fluid.

A. Controllable Discharge:

In most cases, the amount of fluid being discharged is small and operations can be shut down to relieve oil line or flow line pressure while installing a saddle clamp. If possible the oil should be transferred into another storage tank or holding tank.

B. Catastrophic Discharge:

The most damaging type of discharge usually occurs when a large volume of oil is discharged in a short period of time. This is usually caused by ruptured tanks, equipment failure, or major power oil and flow line breaks. In such cases, the containment equipment and manpower should be concentrated well below the leading edge of the discharged oil. This will ensure ample time for installation of containment dikes, dams, and equipment.

C. Flammability:

If discharged material is flammable and is located in a congested area, the local Fire and Police Departments should be notified immediately. The Fire and Police Departments will initiate proper evacuation measures.

CONTAINMENT & REMOVAL

Immediate action to contain the discharged fluid is of the utmost importance. It not only reduces the size of the area affected, it also reduces the cost of cleanup operations. The successful handling of any oil discharge depends on four different operations:

A. Containment;

B. Removal;

C. Disposal; and

D. Cleanup.

MOBILIZATION

A. The availability of equipment, material, and labor is very important. Depending on the terrain and size of the discharge, the following equipment may be needed; dozers, backhoe, tanks or vacuum truck, pumps, hose, booms, fencing, and sorbent materials. The above mentioned equipment can be used in the construction of a skimming pond. The use of several booms in conjunction with a skimming pond at the stream edge is shown in Figures C-1 through C-3.

B. Expedient Booms: Described below are simple booms that can be constructed with materials available from local sources.

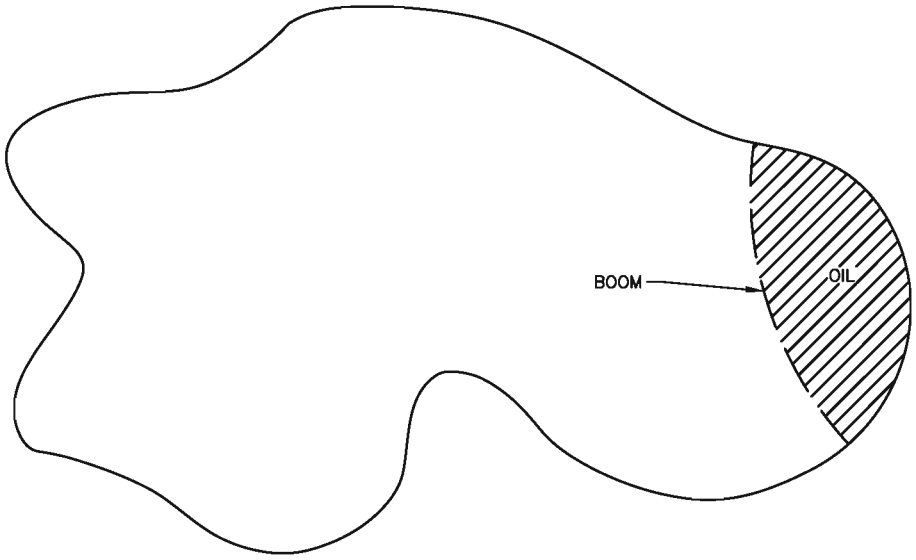
1. Tie several bales of straw or hay (end to end) with steel wire. This acts as a sorbent boom. To use it as a containment-type boom, cover the bales with polyethylene sheets. The boom is attached to a cable and deployed across the stream. Figure C-4 describes this boom.

2. Logs or similar material can also be fastened together (end to end) and deployed across the water channel. Oil, however, passes more easily under this type of barrier. This can be remedied by scattering floating sorbent materials in front of the barrier to help contain the oil. The barrier should be placed at a sharp angle (10^{o}) to the direction of flow.

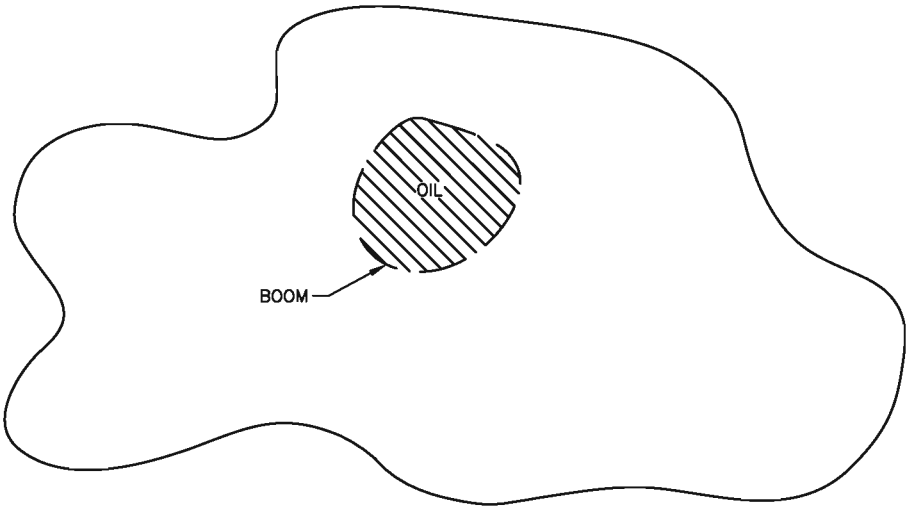
3. Filter Fences: Filter fences can be used to control oil in ditches and streams where, generally, the water depth is four feet or less. This type of containment is very useful since it uses materials available in more areas. This fence can be constructed with chicken or hog wire or chain link fence. Steel or wooden posts can be used for support and hay or straw used for the filter. Posts are driven into the streambed 8 to10 feet apart and set at an angle to the current flow. The wire fencing is then tied to the post, always allowing at least one-foot freeboard (wire above water level). Then anchor the fence to each bank of the stream. The straw or hay is broken out of the bales and spread over the water, the full width of the fence, for 15 to 20 feet back upstream. The depth of the straw or hay should be a minimum of 6 inches thick. In most cases, there should be a series of these filter fences constructed leaving adequate working space between fences. These fences should always be continually maintained so the saturated straw or hay can be replaced as needed (Figure C-4).

C. Flow Construction: It may be possible, where water flow volume is low, terrain permits, and sufficient time is available, to construct a catch basin in the stream channel or divert the water into holding ponds. This allows removal of oil by skimmers or vacuum trucks, etc.

1. Siphon Dam: Figure C-5 illustrates two types of temporary catch basin construction using submerged pipe openings to carry water past the surface barrier, which retains the floating oil. Care should be taken in selection of pipe diameter or number of pipes used to ensure adequate discharge to prevent the dike from overflowing by trapped water.

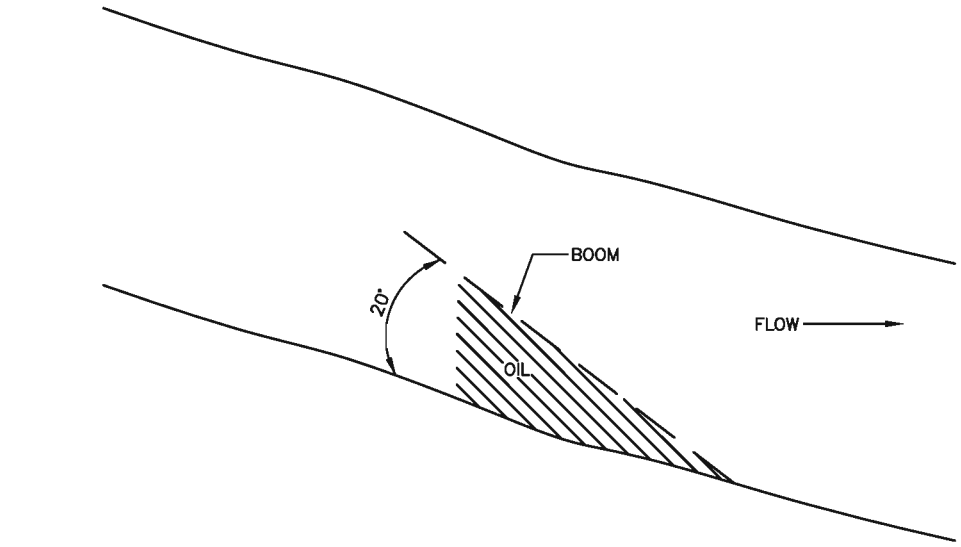


ALONG SHORELINE

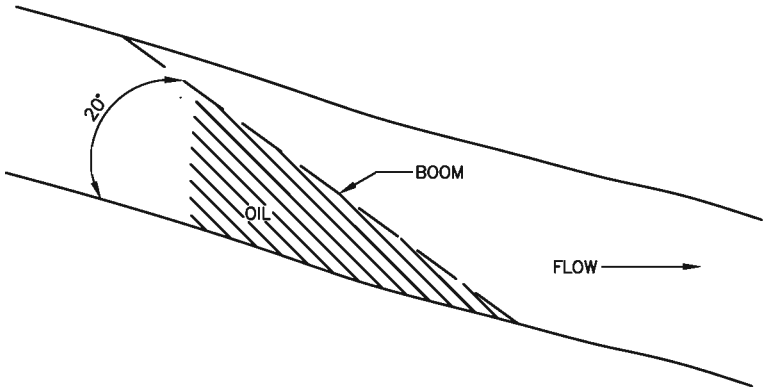


OPEN LAKE

FIGURE C–1
BOOM DEPLOYMENT IN LAKES
OIL CONTINGENCY PLAN

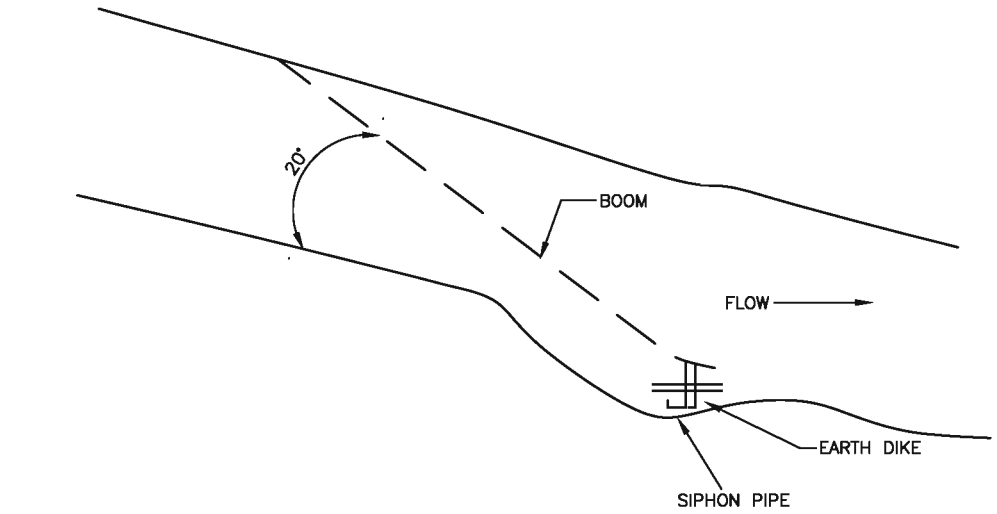


WIDE STREAM

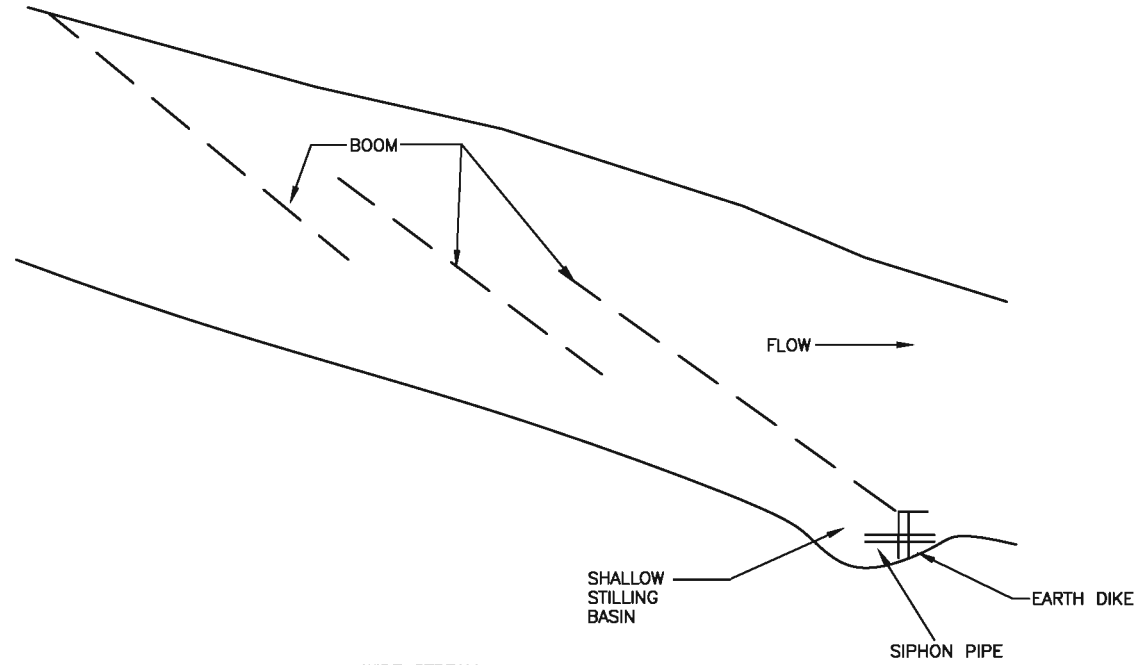


NARROW STREAM

FIGURE C–2
BOOM DEPLOYMENT IN FAST–FLOWING STREAM
OIL CONTINGENCY PLAN

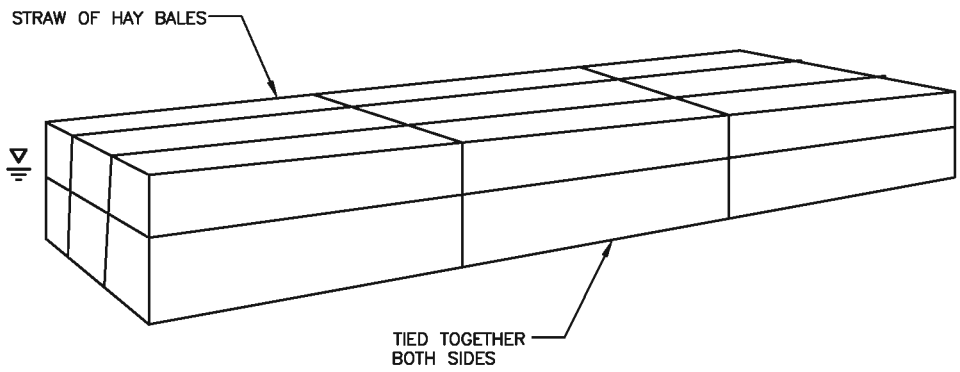


NARROW STREAM

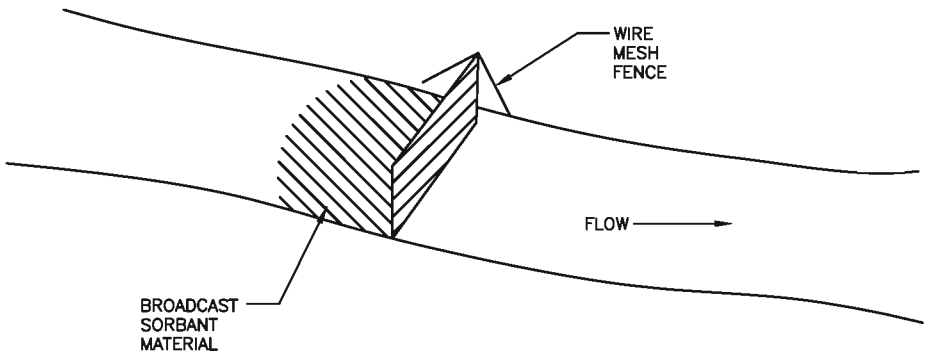


WIDE STREAM

FIGURE C–3
BOOM DEPLOYMENT IN FAST–FLOWING STREAM
ALTERNATE METHOD
OIL CONTINGENCY PLAN

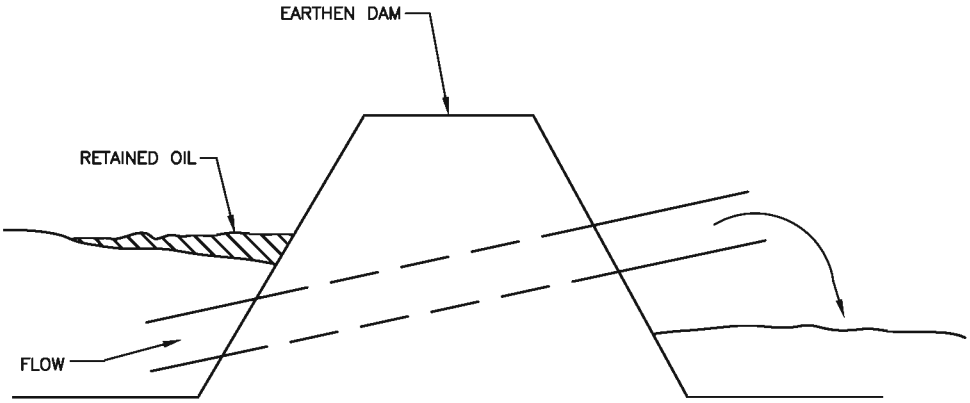


STRAW BALE BOOM



FILTER FENCE

FIGURE C–4
EXPEDIENT BOOM AND FILTER FENCE
OIL CONTINGENCY PLAN



INVERTED SIPHON

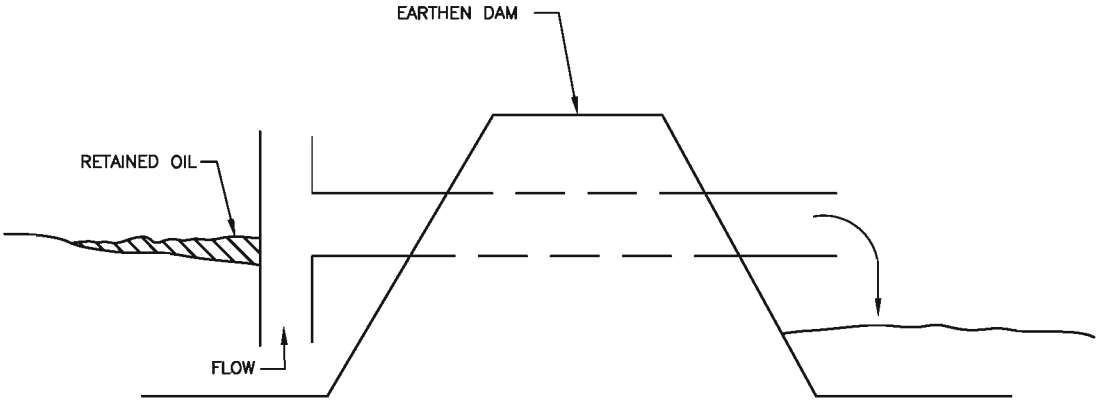


FIGURE C–5
EARTHEN DAM CONSTRUCTION
OIL CONTINGENCY PLAN

REMOVAL OF OIL FROM WATER

A. Ideally, oil removal will be a two-stage operation. The first step is to consolidate the oil slick as much as possible. Greater oil thickness allows more efficient use of skimming equipment. Oil recovered by this process can often be placed back into the production system and thus recovered. The second stage is to remove the remaining skim of oil. This is done by covering the slick with floating sorbent materials and retrieving the saturated materials by hand.

B. Practically, oil is diverted to the most suitable or accessible point where removal equipment can be located. Wind and water currents can be used to help float the oil into pockets for removal. However, wind and water currents can also hinder the operation. Always be aware of these two factors.

TREATING AGENTS

A. Oil spill treating agents are generally classified as dispersants, collecting agents, sinking agents, burning agents, or gelling agents.

B. Chemical agents are not allowed to be used without prior approval of the EPA.

C. GPC does not keep these chemical agents on hand and does not intend for them to be used on any oil spill unless approval is first received from management and then subsequent approval is received from the EPA.

FINAL CLEANUP

A. The final cleanup phase is to remove the oil stains on banks and vegetation bordering the spill area. *If permission is given* and the residual material is combustible, the remaining oil can be burned. The remaining contamination can be picked up by heavy equipment and removed to a disposal site.

B. In order to protect the shoreline, it may be necessary to strip the oil from vegetation by hand or flush with water into a holding pond.

DISPOSAL OF OIL AND SORBENT MATERIALS

Contact the GPC EHS Supervisor who will determine what samples need to be taken and will evaluate what disposal options are best for the particular site.

APPENDIX D

SITE-SPECIFIC INFORMATION

INDEX BY SITE NAME

Appendix D – Site-Specific Information
Index by Site Name

Site Name	Certification Date	County	Section	Township	Range
DESERT SPRINGS STATE 21-36-9-18	7/14/2010	Uintah	36	9S	18E
DESERT SPRINGS STATE 23-36-9-18	7/14/2010	Uintah	36	9S	18E
DESERT SPRINGS STATE 34-36-9-18	7/14/2010	Uintah	36	9S	18E
DESERT SPRINGS STATE 41-36-9-18	7/14/2010	Uintah	36	9S	18E
FEDERAL 11-21-9-19	7/14/2010	Uintah	21	9S	19E
FEDERAL 11-22-9-19	7/14/2010	Uintah	22	9S	19E
FEDERAL 13-18-9-19	7/14/2010	Uintah	18	9S	19E
FEDERAL 14-18-2 #1	7/14/2010	Uintah	18	10S	18E
FEDERAL 21-6-10-19	7/14/2010	Uintah	6	10S	19E
FEDERAL 22-30-10-18	7/14/2010	Uintah	30	10S	18E
FEDERAL 23-12 #1	7/14/2010	Uintah	12	10S	17E
FEDERAL 23-21-9-19	7/14/2010	Uintah	21	9S	19E
FEDERAL 23-29 #1	7/14/2010	Uintah	29	9S	19E
FEDERAL 23-30-9-19	7/14/2010	Uintah	30	9S	19E
FEDERAL 24-20-9-19	7/14/2010	Uintah	20	9S	19E
FEDERAL 24-31-9-19	7/14/2010	Uintah	31	9S	19E
FEDERAL 24-7 #1	7/14/2010	Uintah	7	10S	18E
FEDERAL 31-21-9-19	7/14/2010	Uintah	21	9S	19E
FEDERAL 31-29	7/14/2010	Uintah	29	9S	19E
FEDERAL 32-31-9-19	7/14/2010	Uintah	31	9S	19E
FEDERAL 34-29	7/14/2010	Uintah	29	9S	19E
FEDERAL 41-31-9-19	7/14/2010	Uintah	31	9S	19E
FEDERAL 42-29-9-19	7/14/2010	Uintah	29	9S	19E
FEDERAL 43-30-9-19	7/14/2010	Uintah	30	9S	19E
FEDERAL 44-20-9-19	7/14/2010	Uintah	20	9S	19E
GATE CANYON 31-21-11-15	7/14/2010	Duchesne	21	11S	15E
GATE CANYON 41-19-11-16	7/14/2010	Duchesne	19	11S	16E
GATE CANYON STATE 41-20-11-15	7/14/2010	Duchesne	20	11S	15E

Appendix D – Site-Specific Information
Index by Site Name (Continued)

Site Name	Certification Date	County	Section	Township	Range
LAMB TRUST 24-14-9-19/ LAMB TRUST 14-14-9-19	7/14/2010	Uintah	14	9S	19E
LAMB TRUST 24-22-9-19	7/14/2010	Uintah	22	9S	19E
LITTLE DESERT FEDERAL 43-24-3 #1	7/14/2010	Uintah	24	10S	17E
LYTHAM FEDERAL 22-22-9-19	7/14/2010	Uintah	22	9S	19E
RBU 12-12D	7/14/2010	Uintah	12	10S	18E
RYE PATCH FEDERAL 22-21	7/14/2010	Duchesne	11	11S	14E
RYE PATCH FEDERAL 24-21	7/14/2010	Duchesne	24	11S	14E
SHEEP WASH FEDERAL 11-25-9-18	7/14/2010	Uintah	25	9S	18E
SHEEP WASH FEDERAL 12-25-9-18	7/14/2010	Uintah	25	9S	18E
SHEEP WASH FEDERAL 21-25-9-18	7/14/2010	Uintah	25	9S	18E
SHEEP WASH FEDERAL 31-25-9-18	7/14/2010	Uintah	25	9S	17E
SHEEP WASH FEDERAL 32-25-9-18	7/14/2010	Uintah	25	9S	18E
STATE 12-32-9-19	7/14/2010	Uintah	32	9S	19E
STATE 24-16-9-19	7/14/2010	Uintah	16	9S	19E
STATE 4-32B	7/14/2010	Uintah	32	9S	19E
STATE 7-36A	7/14/2010	Uintah	36	9S	18E
WILKIN RIDGE FEDERAL 12-4-11-17	7/14/2010	Duchesne	4	11S	17E
WILKIN RIDGE FEDERAL 23-29-10-17	7/14/2010	Duchesne	29	10S	17E
WILKIN RIDGE FEDERAL 34-17-10-17	7/14/2010	Duchesne	17	10S	17E
WILKIN RIDGE STATE 12-32-10-17	7/14/2010	Duchesne	32	10S	17E
WILKIN RIDGE STATE 24-32-10-17	7/14/2010	Duchesne	32	10S	17E