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October 22, 2015

VIA EMAIL AND U.S. MAIL

Ms. Linda Collart
Regional Mineral Resource Supervisor
Division of Mineral Resources
NYS Department of Environmental Conservation
6274 E. Avon-Lima Road
Avon, New York 14414

Re: Tioga Energy Partners, LLC
Snyder E-1 and E-1A Well Applications

Dear Ms. Collart:

This office represents Tioga Energy Partners, LLC ("TEP") regarding the above-referenced applications. TEP continues to work toward securing and satisfying the various regulatory and other requirements/approvals necessary for this project to move forward. Set forth below is a status update of TEP's efforts.

Emergency Response Plan ("ERP")

Attached as Exhibit #1 is the ERP describing how TEP will respond to any non-routine incidents or emergency situations that may occur at the site.

Fracturing Fluid Disclosure

My October 2, 2015 correspondence provided additional information regarding the chemical constituents of the waterless hydraulic fracturing treatment to be used for the project. The October 2, 2015 correspondence neglected to mention that, although the information provided is eligible for protection as confidential, proprietary information, TEP is not requesting confidential treatment of that information, nor any of the chemical disclosure information previously provided to the Department.

Casella Waste Services

Attached as Exhibit #2 is additional correspondence from Casella Waste Services affirming their ability and willingness to accept flowback waste, although none is anticipated, from development of the Snyder wells.

Standby Generators

Attached as Exhibit #3 are manufacturer specifications, including sound emission levels, for the mobile, natural gas/LP-powered standby generator that will power the refrigeration unit used during flowback operations, and other equipment as necessary. The standby generators will be available for use throughout the flowback operation which is anticipated to last 66 days.

Truck Traffic

The October 2, 2015 correspondence included maps identifying preferred trucking routes for propane deliveries to the well site. As shown on the routing maps, the entirety of the planned trucking routes are over state and county roadways.

TEP has recently met and held discussions with Tioga Investigates Natural Gas ("TING") regarding, among other things, these proposed trucking routes. Based upon this proposed routing, as well as compliance with load limits (size and weight), Tioga County Department of Public Works ("Tioga DPW") has provided preliminary agreement with the proposed routing. As discussed with Tioga DPW, vehicles hauling oversized drilling equipment will require special permitting.

Although the use of local town roads is not anticipated, TEP will meet with the Town of Barton DPW to review the truck routing plans and address any concerns that the Town may have.

U.S. Department of the Interior – Fish and Wildlife Service

Attached as Exhibit #4 is correspondence from the U.S. Department of the Interior's Fish and Wildlife Service acknowledging receipt of a "no effect" letter and confirming that no further ESA coordination or consultation is required.

Gas Block

Pursuant to standard operating procedures Gas Block will be used at the surface casing for the Snyder wells.

If you have any questions or comments, please contact me.

Very truly yours,

COUCH WHITE, LLP

Adam J. Schultz

AJS/mcs
Enclosures

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EXHIBIT #1
(EMERGENCY RESPONSE PLAN)

Emergency Response Plan

For Well Site Construction, Drilling and Completion Operations,
including Hydraulic Fracturing & Flowback Operations

Snyder E 1/1A

233 Hamilton Valley Road
(Lockwood, NY 14859)
Halsey Valley, Barton
Tioga County, NY

WELL SITE ENTRANCE: 42.14457, -76.454039
ACCESS ROAD ENTRANCE GPS: 42.136901, -76.451162
NAD1983

Tioga Energy Partners, LLC

PO Box 22222
Albany, NY 12201
(518) 426-4600

Version Date: October 2015

FLATROCK
ENGINEERING & ENVIRONMENTAL

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Tioga Energy Partners, LLC
Emergency Response Plan

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Emergency Response Plan

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1. INTRODUCTION

This Emergency Preparedness Plan has been prepared to help minimize any hazards that may result from Tioga Energy Partners, LLC's (TIOGA) operations. No emergency plan can cover all situations, and there is no substitute for the sound judgment of persons involved. In an emergency, **THE SAFETY OF THE PUBLIC MUST ALWAYS BE GIVEN FIRST PRIORITY.**

Emergency Guidelines

An emergency is a hazardous (potentially dangerous) situation near or directly involving TIOGA-controlled property, equipment or operations. Reasonably anticipated hazardous situations include, but are not limited to:

- Significant release of escaping gas (reported or actual) from/near TIOGA wells/equipment/pipelines/plants;
- Skin irritation or chemical burn;
- Major vehicle accident;
- Fire or explosion near or directly involving TIOGA equipment;
- Significant spills (reported or actual) of oil, condensate, chemicals or produced water;
- Natural disaster (flood, tornado, hurricane, lightning, etc.) near or directly involving TIOGA-controlled property or equipment.

Communications

Effective communications are critical for an adequate response to an event. As such, ***APPENDIX A*** -APPENDIX A - contains ***EMERGENCY CONTACT LISTS***
.

Contractors and subcontractors on this site have coordinated their emergency response plans to ensure that these plans are compatible and that source(s) of potential emergencies are recognized, alarm systems are clearly understood, and evacuation routes are accessible to all personnel relying upon them.

2. ON-SCENE EMERGENCY RESPONSE PROCEDURES

*(*refer to ***APPENDIX B - INITIAL RESPONSE ACTIONS FOR SPECIFIC EMERGENCY SCENARIOS****)*

The following on-scene priorities will be followed in emergency situations:

□ PROTECT LIFE

- Safe rescue and/or evacuation of personnel or the public.
- Provide first aid to any injured as training allows.
- Call for Emergency Medical Services (refer to ***Emergency Medical Service Contact List***).
  - If remote, consider meeting the ambulance at an agreed-on location.
  - Let the dispatcher know where to meet, directions to the location, what action may be needed upon arrival, and where the Emergency Coordinator can be reached or located.

□ SAFELY MITIGATE THE CIRCUMSTANCES

- Shut off hazardous energy sources
  - Close valves to limit fuel sources
  - Extinguish small fires
  - Utilize fire departments to cool and protect nearby structures and property
  - Use diking and diversionary techniques to contain/direct spills
  - Control traffic; etc.
  - Use ***INITIAL RESPONSE ACTIONS FOR SPECIFIC EMERGENCY SCENARIOS*** (refer to ***APPENDIX B -***)
- ***SAFELY*** prevent actions that would risk further injury or loss of life.
- **If it is not safe to mitigate the hazard(s) and there is an ongoing threat, then back off. Quick planning is required and a *Site Safety Plan* (refer to *Section 6*) should be prepared.**

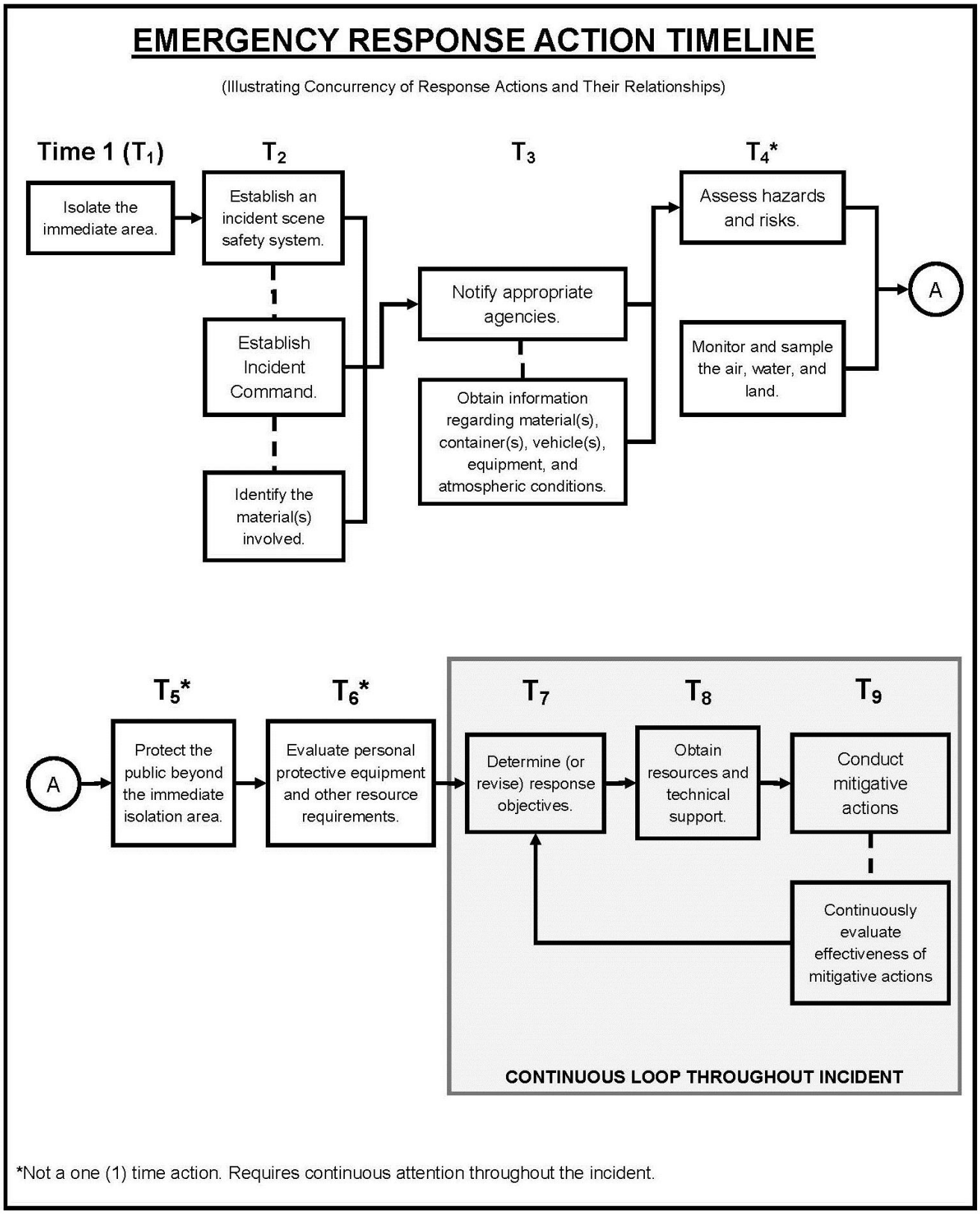
□ COMMUNICATE UP AND OUT

- Contact support services for help
  - Personnel and/or equipment
- Notify the appropriate parties inside and outside of the TIOGA organization
  - ***EMERGENCY CONTACT LISTS***
  - (refer to ***APPENDIX A -***)
  - Evaluate and document the emergency response

□ SECURE THE SITE

- Protect the public from further injury, loss, or damage
  - Restrict public access to site area
  - Facilities safe emergency operations
  - Preserve evidence for investigation

Figure 1 Emergency Response Action Timeline



Site Security Tips and Recommendations

1. **Utilize the local Sheriff or Police Departments to help set up the perimeter.**
    a. Consider traffic patterns and parking needs.
    b. Secure the area from onlookers, the media, and unauthorized/unnecessary personnel.
2. **Cooperate with law enforcement officials.**
3. **Access should be limited to appropriate TIOGA personnel and contractors, approved attorneys, regulatory personnel, insurance investigators and adjustors.**
    a. Do not let anyone who merely wants to “look at what happened” wander about the site.
    b. Cooperate with Local, County, State and Federal agency personnel having jurisdiction related to the incident. It is often best (for their safety) to escort them throughout the site.
4. **When possible, write down the name, company and phone number of every person on location at the time of the incident, or, as an alternative, request a business card from each individual.**
    a. Information could be helpful during the follow up investigation.
5. **Do not allow removal of any equipment (evidence) that was on site at the time of the incident.**
    a. If, due to some unusual circumstances, an item must be removed do not allow it to be altered or destroyed and know exactly where it is going.
6. **Do not allow Trespassers!**
    a. If an unauthorized person refuses to honor the access limitation and enters the secured area, inform them (preferably in front of a witness) that they are trespassing and demand that they leave. If they do not leave immediately contact local law enforcement authority and ask for their help to remove the trespasser.

3. EMERGENCY ALERTING & EVACUATION

Emergency Communication Systems and Alarms

Internal emergency communication systems are used to alert workers to danger, convey safety information, and maintain site control. Any effective system can be employed. Two-way radio headsets, frequency scanners, and cell or field telephones are often used when work teams are far from the command post. Hand signals and air-horn blasts are also commonly used. Every system must have a backup. It shall be the responsibility of the Safety/Environmental Specialist to ensure an adequate method of internal communication is understood by all TIOGA and public safety personnel entering the site.

Unless all personnel are otherwise informed, the following signals shall be used:

- **Emergency signals by portable air horn, siren, or whistle: two short blasts, personal injury; continuous blast, emergency requiring site excavation.**

- **Visual signals: hand gripping throat, out of air/cannot breathe; hands on top of head, need assistance; thumbs up, affirmative/ everything is OK; thumbs down, no/negative; grip partner's wrist or waist, leave area immediately.**

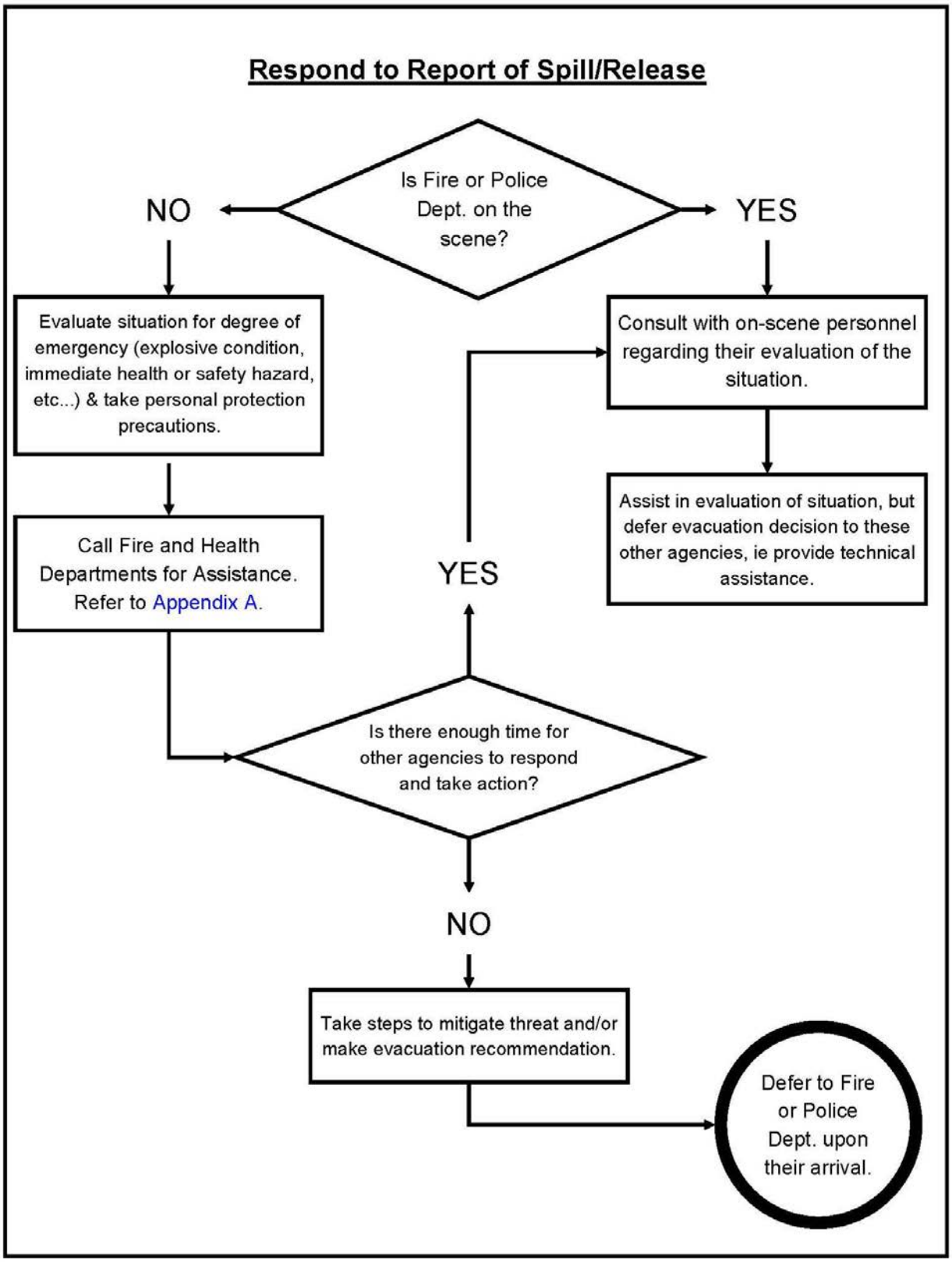
Evacuation

Protection of public health and safety during a spill or fire response may require evacuating residents and other personnel from the area temporarily. An evacuation may be as limited in scope as temporarily relocating the residents of a single home to as significant as evacuating all residents within several miles of the incident or in the downwind path of a migrating cloud of toxic vapors, gases, and/or smoke. The length of time evacuees must remain away from the affected area can range from a few hours to several days or weeks.

If evacuation notice is given, site workers leave the worksite with their respective buddies, if possible, by way of the nearest exit. **The evacuation routes and assembly area will be determined by conditions at the time of the evacuation based on wind direction, the location of the hazard source, and other factors as determined by rehearsals and inputs from emergency response organizations.** Wind direction indicators are located so that workers can determine a safe up wind or cross wind evacuation route and assembly area if not informed by the Incident Commander at the time the evacuation alarm sounds. Personnel exiting the site will gather at a designated assembly point, or muster area. To determine that everyone has successfully exited the site, personnel will be accounted for at the assembly site. If any worker or visitor cannot be accounted for, notification is given to the Safety/Environmental Specialist so that appropriate action can be initiated.

TIOGA personnel do not have the authority to authorize an evacuation action. *If an emergency condition requiring an immediate evacuation is detected and there is no time for contacting the appropriate agencies, provide advice consistent with training and experience.*

Figure 2: Respond to Report of Spill/Release



4. RECEIVING AN EMERGENCY CALL

*(Use the provided **EMERGENCY REPORTING FORM** at end of this section to capture key data!)*

When a TIOGA employee receives a report of a possible emergency, they will**:**

1. Obtain and record the following information from the caller:

- Name, Address and Telephone Number
- Exact Location (state, county, township, section, city, address, etc.)
- Nature of Emergency
- Date and Time of Report
- ***Advise the caller:***
  - ***To Protect Life*** *(move to a safe area, call EMS, provide safe rescue, evacuation, etc.)*
  - That TIOGA intends to get help on the way

2. Contact the Area Operations Supervisor

- The Area Operations Supervisor will dispatch initial resources to the incident location;
- The Area Operations Supervisor will utilize the ***INITIAL RESPONSE ACTIONS FOR SPECIFIC EMERGENCY SCENARIOS***.
- The Area Operations Supervisor will evaluate the initial information to rank the severity of the incident using the following information. The Area Operations Supervisor/Incident Commander will notify the Level 2 and/or Level 3 Incident Commanders as appropriate.

Incident Command System Classification Levels

The severity of the incident must be assessed to properly establish the incident level, according to the Incident Command System (ICS).

Level 1 Incident

General Description: An incident involving minor damage/loss to TIOGA equipment, minor personnel injuries, minor environmental damage. No media coverage is anticipated. Area personnel can control the incident.

Level 1 Examples:

Safety	Environmental	Operations	Media
Minor Injuries	**Non-reportable Release or Incident**	**Asset loss < $25,000**	**None Anticipated**

Level 2 Incident

General Description: An incident involving moderate damage/loss to TIOGA equipment, or clean-up costs, or injury requiring medical treatment. Potential exists for landowner conflict or limited media coverage.

Level 2 Examples:

Safety	Environmental	Operations	Media
Severe or Lost Time Injury	**Reportable Release or Incident**	**Asset loss >$25,000 and < $100,000**	**Limited Coverage**

Level 3 Incident

General Description: An incident involving significant damage/loss to TIOGA equipment, or clean-up costs, lost time injury or fatality. Landowner conflict and/or media coverage is expected. Often, this may be a continuing (uncontrolled) threat.

Level 3 Examples:

Safety	Environmental	Operations	Media
Hospitalization or fatality; Actual or potential release to an urban area.	**Release to body of water; Large brine spill to cropland; Uncontrolled release**	**Asset loss >$100,000**	**Expect extensive coverage**

TIOGA ENERGY PARTNERS, LLC
EMERGENCY REPORTING FORM

Date:	Time:	A.M. / P.M.
Employee Taking Report:		
Name of Caller:		
Telephone Numbers for Caller:	( ) *area code*	OR ( ) *area code*

Location of Problem:

State: _____ County: _____

Facility Name (any signs indicating well name, rig number, etc.?): _____

Legal Desc.: (if known) _____

Distance & Direction From Nearest Town: _____

Nearest Road Intersection: _____

Any other information which may help us to locate the problem: _____

_____

Description of Emergency:

_____

_____

_____

_____

_____

TIOGA Person Notified: _____

Telephone Number: _____

Time of Notification: _____

5. INCIDENT MANAGEMENT TEAM

The Incident Management Team is a comprehensive management structure that can be utilized in whole or in part for any emergency. TIOGA will utilize only the management team components that are needed at each incident.

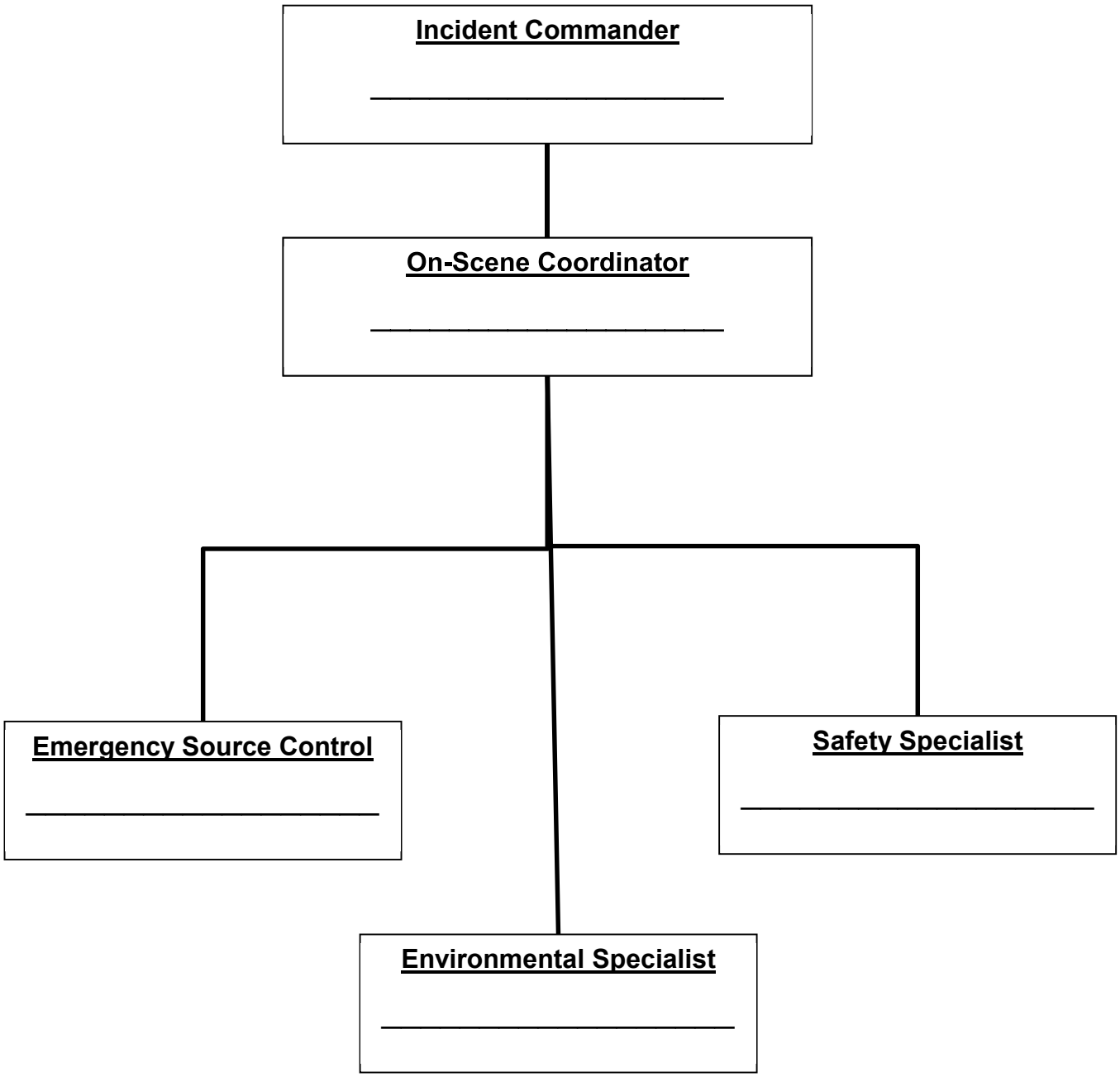
The structure of the team depends on the details and "level category" of an incident. For example, Level 1 incidents are handled by field personnel with some support from corporate resources (safety, environmental).

Depending on the incident, the same person may perform the roles of more than one of the Incident Management Team positions.

The Incident Commander will have an On-Scene Coordinator to facilitate the response and ensure overall safety during mitigation measures. During significant incidents, the Incident Commander may establish a "forward command post" near the scene of the incident to better facilitate on-site operations. In the event of establishment of a forward command post, the Incident Commander may assume the role of On-Scene Coordinator.

Incident Management Team Structure

The Team listed below is responsible for level 1, 2, and 3 incidents.



Incident Management Team Checklist		
Position	**Responsibilities**	**Comments**
Incident Commander	□ Assist field personnel if necessary. o Med-Evac o Hospital notifications o Contractors o Dispatch personnel □ Commit necessary fiscal resources to address incident. □ Inform Incident Management Team in person or by phone. □ Establish Objectives. □ Notify Technical Support, Legal and/or Human Resources as applicable. □ Establish reoccurring meeting times for team updates. □ Brief next level Incident Commander as appropriate. □ Ensure that a Site Safety Assessment is conducted as necessary. □ Establish a near site command post if necessary.	
On-Scene Coordinator/ Operations Officer	□ Usually positioned at site of incident. □ Implement plan as presented by Incident Commander. □ Provide feedback to Incident Command. □ Maintain site security. □ Ensure safe operations.	
Emergency Source Control	□ Commence source control operations. o Contractors □ Brief Incident Commander as appropriate. □ Ensure source control work is conducted safely.	

Incident Management Team Checklist (cont.)		
Position	**Responsibilities**	**Comments**
Environmental Specialist	□ Conduct Agency Notifications. □ ***APPENDIX A -APPENDIX A -*** □ ***APPENDIX A -APPENDIX C -*** □ Brief Incident Commander as appropriate. □ Ensure source control work is conducted safely.	
Safety Specialist	□ Work with onsite personnel to identify hazardous situations. □ Work with onsite personnel to develop onsite safety plan. □ Conduct safety inspections and investigate accidents. □ Coordinate post incident briefings. □ Lead Root Cause Analysis on most Level 2 or greater incidents.	
Media Spokesman	□ Establish information center. □ Prepare media statement. □ Field calls from media.	
Finance Officer	□ Responsible for all financial, administrative, and cost analysis of the incident. □ Oversee AFE preparation as necessary. □ Oversee partner notification as necessary.	
Planning Officer	□ Responsible for collecting, evaluating and disseminating tactical information related to the incident. □ Identify and coordinate special resources. □ Provide periodic predictions on incident potential. □ Distribute orders from Incident Command.	
Logistics Officer	□ Coordinate transportation needs and resources. □ Establish support services: ○ Lodging ○ Fuel ○ Catering ○ Staging Areas □ Prepare communications plan.	

6. SITE SAFETY ASSESSMENT

Onsite or dispatched personnel will assess the situation:

- How much gas/fluid is escaping?
- What is the wind speed and direction?
- Is fire involved or threatened?
- What is the danger of explosion?
- Where are the nearest occupied buildings or places of public assembly relative to the emergency?
- Is evacuation warranted?
- Is the situation likely to get worse?

If an emergency situation does exist, personnel will report it immediately to the Area Operations Supervisor/Incident Commander. The notification should include any additional personnel, materials or equipment needed.

Should the incident be a continuing threat or be particularly complicated before returning to normal status, the Safety Specialist will work with the Incident Commander and onsite personnel to develop a Site Safety Plan prior to continuing response efforts.

Site Safety Plan

See form at end of section

The following apply to the content and utilization of the Plan:

- It is provided to workers in the field, and workers are provided the opportunity to ask questions about the plan.
- It should be reviewed daily by onsite supervision.
- A new site safety plan should be developed and provided to workers if site conditions change significantly.

Tioga Energy Partners, LLC
Site Safety Plan

Location:	**Date:**	
Incident Level: 1 2 3	**City:**	**State:**

Job Description:

Company Incident Commander:	**Phone:**	**Cell:**
Company On-Scene Coordinator:	**Phone:**	**Cell:**
Company Safety Specialist:	**Phone:**	**Cell:**
Company Environmental Specialist:	**Phone:**	**Cell:**
Company Emergency Source Control Representative:	**Phone:**	**Cell:**
Contractor Site Safety Representative:	**Phone:**	**Cell:**

Injury and Illness Management

(Here is what you will do in the event of an injury / illness on this job)

First Aid/Minor Treatment Facility:	**Phone:**
Contact: (Dr. or professional medical providers name)	**Phone:**
Emergency Medical Treatment Facility: (Local hospital)	**Phone:**
Emergency Transportation Provider: (Attach driving route to this plan)	**Phone:**

Incidents that require medical treatment will be handled as follows: (Describe how you will insure your site supervisors and employees know that all incidents must be immediately reported to the supervisor who in turn will immediately report the incident to the Company Incident Commander. Be specific with names and phone numbers and what exactly you plan to do.)

Job Scope Overview

(Describe the major elements or phases of the project or job.)

Phase	Activity

Hazard Communications

(Your plan for communicating the hazards of the chemicals brought to the site; including pre-job review of chemicals used and required precautions and PPE for specific chemicals)

Chemicals brought on site: (By generic use name) 1. 2. 3. 4.	**Special PPE or handling requirements**: (List the PPE requirements for each chemical listed) 1. 2. 3. 4.

Are MSDS's supplied for each chemical brought on site? (The MSDS's for these chemicals will be reviewed during the pre-job hazard review.)	**Yes☐**	**No☐**	**NA☐**

☐**ATV Safety**	☐**Cranes/Hoists**	☐**Haz Com**	☐**Lead**	☐**Respiratory**
☐**Asbestos**	☐**Electrical Safety**	☐**Hazwoper**	☐**Lifting/Rigging**	☐**Tank Cleaning**
☐**ATW**	☐**Excavation**	☐**Hearing**	☐**Lockout/Tagout**	☐**Vehicle Safety**
☐**Abrasive Blasting**	☐**Equip. Inspection**	☐**Heat/Cold Stress**	☐**Pipeline Repair**	☐**Other:**
☐**Boat Safety**	☐**Fall Protection**	☐**Hotwork**	☐**Pipeline Locate**	☐**Other:**
☐**Confined Space**	☐**Hand/Power Tools**	☐**H_2S**	☐**Radiation**	☐**Other:**

Required Safety/Work Permit(s) and/or Procedure(s) that Contractor Company will complete

☐**Hot Work**	☐**Excavation Checklist**	☐**LO/TO/Blinding**	☐**Pre-Entry Checklist**	☐**Confined Space**
☐**One Call**	☐**Other:**			

Recognized Hazards

(A) Throughout the job and
(B) Hazards unique to each phase of the job to be discussed prior to the start and prior to each job phase.

(This is what you think the job hazards are going to be before the start of work. A site walk-through / evaluation will help you identify hazards. When conditions change (i.e. phases) so might hazards and necessary required controls/permits.)

Consider: Flammability; Chemical; Physical (Electrical, Pressure, Gravity, Temperatures); Biologic (Blood Pathogens, Wildlife control); Special (Confined Space, Trench Control); etc.

(A) Hazards throughout The Job:	**Control Methods:**
(B) Hazards Unique to Each Phase of The Project (Identify project phase in job scope, unique hazards and controls):	**Control Methods:**

Site Safety Plan

(Here are the protective equipment, communications, and other activities you utilize to address the hazards on the job)

PERSONAL PROTECTIVE EQUIPMENT REQUIRED ON THIS JOB

List PPE Required Throughout the Job At All Times:

Head
Eye
Foot
Ears
Respiratory
Hand
Body
PFD

List and discuss conditions requiring additional PPE:

Head
Eye
Foot
Ears
Respiratory
Hand
Body
PFD

Communications: List and discuss communications necessary:

Radio
Bull Horn
Cell Phones
Buddy System
In-Suit or SCBA Communication
Hand Signals Verified

AIR MONITORING (Record all readings and attach to site monitoring plan):

Oxygen	**Y N**
Flammable Gas	**Y N**
H_2S	**Y N**
SO_2	**Y N**
Benzene	**Y N**
Other:	**Y N**

7. MEDIA RESPONSE

Use the following guidelines to address a media response to a TIOGA event.

1. Refer the media to TIOGA's Media Spokesperson.
2. Generally, employees are discouraged from talking to the media.
3. **If "cornered" politely tell the media: *"that an event has happened (accident, release, injury, etc.). You are working on the situation but will provide them with a briefing as the facts become available". Ask for their name, number affiliation, and deadline.***
4. Do not discuss or release the name of fatalities or injured persons.
5. Do not speculate as to the cause or amount of the damages.
6. Politely excuse yourself and return to your work.
7. TIOGA's Media Spokesperson will help you with any briefings. Initially they will use the following template(s) (see ***Verbal Initial Media Statement – No Injuries*** and/or ***Verbal Initial Media Statement – Injuries***).

Verbal Initial Media Statement – No Injuries

Name of Media Representative: _____

Name of Media Organization: _____

Date: _____ **Time (am\pm):** _____

"My name is _____. I'm a _____ (Job Title) for Tioga Energy Partners, LLC. At approximately _____ a.m./p.m. _____ (today / last night / yesterday), a _____ (Accident / Fire / Explosion / Gas Release / Spill) occurred at the _____ facility located approximately _____ miles _____ (east/west/north/south) of _____ (Nearest Town/City).

There are no injuries associated with this incident.

Protecting our employees, contractors, and the public is our first priority. Therefore, an Emergency Response Plan that is designed, first and foremost, to protect life, has been activated. As I speak, positive action is being taken by experienced Tioga Energy Partners, LLC personnel and expert contractors to address this incident. The cause of this incident is not yet known and no estimate of damage is available. Tioga Energy Partners, LLC will fully cooperate with all appropriate government agencies in addressing this situation. Additionally, Tioga Energy Partners, LLC will be investigating this incident as soon as possible. I'm a member of the Incident Management Team and have duties to perform. Therefore, for additional information about this incident, you may call Mr. Adam Schultz. He can be reached at Tioga Energy Partners, LLC's local office at (518) 320-3411. Thank you."

(TURN AND WALK AWAY AND DON'T LOOK BACK.)

Verbal Initial Media Statement – Injuries

Name of Media Representative: _____

Name of Media Organization: _____

Date: _____ **Time (am\pm):** _____

"My name is _____. I'm a _____ (Job Title) for Tioga Energy Partners, LLC. At approximately _____ a.m./p.m. _____ (today / last night / yesterday), a _____ (Accident / Fire / Explosion / Gas Release / Spill) occurred at the _____ facility located approximately _____ miles _____ (east/west/north/south) of _____ (Nearest Town/City).

There are injuries associated with this incident. However, the numbers, names, and conditions of those injured have not been confirmed for release. Protecting our employees, contractors, and the public is our first priority. Our primary concern is for those who have been injured in this incident and their families. That is where our principal focus is right now. Therefore, an Emergency Response Plan that is designed, first and foremost, to protect life, has been activated. As I speak, positive action is being taken by experienced Tioga Energy Partners, LLC personnel and expert contractors to address this incident. The cause of this incident is not yet known and no estimate of damage is available. Tioga Energy Partners, LLC will fully cooperate with all appropriate government agencies in addressing this situation. Additionally, Tioga Energy Partners, LLC will be investigating this incident as soon as possible. I'm a member of the Incident Management Team and have duties to perform. Therefore, for additional information about this incident, you may call Mr. Adam Schultz. He can be reached at Tioga Energy Partners, LLC's local office at (518) 320-3411. Thank you."

(TURN AND WALK AWAY AND DON'T LOOK BACK.)

8. INCIDENT INVESTIGATION

All incidents will be investigated as appropriate. TIOGA Management and the Area Operations Supervisor will determine how and when the emergency incident is to be investigated. Investigations should determine the cause, how to prevent recurrence and how to improve emergency procedures. Insurance companies may be notified and expert consultants and labs employed as needed.

A Root Cause Analysis (RCA) will be performed on many incidents to identify the causes of the emergency, to reveal any operational, maintenance or equipment problems and to solve them. The Area Operations Supervisor may lead an RCA (formally or informally) for Level 1 incidents; however, minor Level 1 incidents may not warrant a formal RCA.

An RCA will be conducted for most Level 2 & 3 incidents. TIOGA may choose to have legal representatives or other professionals involved in or directing the incident investigations or root cause analyses.

APPENDIX A - EMERGENCY CONTACT LISTS

EMERGENCY CONTACT LISTS

Company Responder Contact List

TIOGA ENERGY PARTNERS, LLC			
NAME	**TITLE**	**CELL PHONE**	**OFFICE PHONE**
Adam Schultz	Consultant		(518) 426-4600

EMERGENCY CONTACT LISTS

Emergency Medical Support Contact List

TIOGA COUNTY, NY

AMBULANCE SERVICE(S)

DESCRIPTION	LOCATION	PHONE NUMBER
Spencer Emergency Squad	47 West Tioga Street Spencer, NY	911 or (607) 589-6435

HOSPITAL(S)

DESCRIPTION	LOCATION	PHONE NUMBER
Lourdes Hospital: (43 minutes/36 miles)	169 Riverside Drive Binghamton, NY 13905	(607) 798-5111
UHS Wilson Medical Center: (41 minutes/34 miles)	33-57 Harrison Street Johnson City, NY 13905	911 or (607) 763-6000
Cayuga Medical Center of Ithaca: (37 minutes/27 miles)	101 Dates Drive Ithaca, NY 14850	(607) 274-4411
Guthrie Robert Packer Hospital - Sayre: (24 minutes/16 miles)	One Guthrie Square Sayre, PA 18904	(570) 888-6666 (570) 887-2854

URGENT CARE SERVICE(S)

DESCRIPTION	LOCATION	PHONE NUMBER
Lourdes Hospital Fast Track (10am - 1am): (43 minutes/36 miles)	169 Riverside Drive Binghamton, TX 13905	(607) 798-5231
UHS Wilson Medical Center's Rapid Care (11am - 11pm): (41 minutes/34 miles)	33-57 Harrison Street Johnson City, NY 13905	911 or (607) 763-6000
Convenient Care at Ithaca (7am - 10pm): (43 minutes/30 miles)	10 Arrowwood Dr. Ithaca, NY 14850	(607) 274-4150

EMERGENCY CONTACT LISTS

Public Safety Group Contact List

TIOGA COUNTY, NY

FIRE DEPARTMENT(S)

DESCRIPTION	LOCATION	PHONE NUMBER
Halsey Valley Fire Co	506 Hamilton Valley Rd Spencer, NY 14883	911 or (607) 589-6128

SHERIFF'S DEPARTMENT

DESCRIPTION	LOCATION	PHONE NUMBER
Tioga County Sheriff's Department: Sheriff Gary Ward	103 Corporate Drive Owego, NY 13827	911 or (607) 687-1010

EMERGENCY MANAGEMENT

DESCRIPTION	LOCATION	PHONE NUMBER
Tioga County Emergency Management	103 Corporate Drive Owego, NY 13827	(607) 687-2023

EMERGENCY CONTACT LISTS

Regulatory Agency Contact List

NEW YORK STATE DEPT. OF ENVIRONMENTAL CONSERVATION (NYSDEC)

DESCRIPTION	LOCATION	PHONE NUMBER
New York State Department of Environmental Conservation (NYSDEC): 24-hr Hotline	NY	(800) 457-7362
NYSDEC Department of Mineral Resources - Region 8, Avon: Ms. Linda Collart	Avon, NY	(585) 226-5376
NYSDEC Division of Mineral Resources - Central Office, Albany	Albany, NY	(518) 402-8056

NEW YORK STATE

DESCRIPTION	LOCATION	PHONE NUMBER
American Association of Poison Control Centers	US	(800) 222-1222
Centers for Disease Control (Agency for Toxic Substances and Disease Registry)	US	(404) 633-5313
Chemical Transportation Emergency Center (CHEMTREC)	US	(800) 424-9300
Chlorine Emergency Plan (CHLOREP)	US	(212) 682-4323
Hazardous Materials Systems (formerly the Bureau of Explosives), Association of American Railroads	US	(202) 639-2222
National Response Center (NRC): 24-hr Hotline	US	(800) 424-8802
New York State Department of Health (NYSDOH)	NY	(866) 881-2809
NYSDEC - Spill Hotline	NY	(800) 457-7362
OSHA	US	(800) 321-6742
REGION II Regional Response Team	US	(201) 548-8730
Texas Tech University Pesticide Hotline (National Pesticide Telecommunications Network)	US	(800) 858-7378
The Upstate New York Poison Control Center Upstate Medical University	750 E Adams St Syracuse, NY 13210	(800) 222-1222
US Coast Guard (USCG) & Department of Transportation National Response Center (NRC)	US	(800) 424-8802
US Department of Transportation (DOT)	US	(202) 426-2075
US EPA Emergency Response Division (ERD): US EPA Response & Prevention Branch Office	Edison, NJ	(201) 548-8730
US EPA Environmental Response Team (ERT)	Edison, NJ	(201) 321-6660
US EPA Toxic Substances Control	US	(800) 424-9605
USCG COTP New York	New York, NY	(212) 668-7936
USCG Long Island Sound	Long Island, NY	(203) 773-2464
USCG MSO Buffalo	Buffalo, NY	(716) 846-7168

APPENDIX B - INITIAL RESPONSE ACTIONS FOR SPECIFIC EMERGENCY SCENARIOS

Injury/Accident/Vehicle Accident

Examples:

- Employee accident involving serious injury
- Vehicle accident involving serious injury
- Contractor accident involving serious injury
- Hazardous material release causing threat to employees or public (refer also to ***Major Spill***)

PROTECT LIFE

- Evacuate personnel and public to a safe point and isolate area
- Provide safe rescue
- Provide first aid: Call EMS and appropriate agencies
- Transport

MITIGATE SITUATION

- If vehicle accident, move to safe area and set up traffic warnings via flares or reflective triangles
- Call 911 for traffic help
- Direct traffic if you can do so safely
- Control energy sources

COMMUNICATE UP

- Employees - inform supervisors of emergency
- Supervisors - assess the situation and keep lines of communication open to both on-site employees and operations management
- If Contractor, contact operations management
- Provide input regarding the need for additional personnel, technical services, contract specialists, etc.
- Notify corporate management as appropriate as well as the Safety/Environmental Specialist
- Notify NYSDEC and other appropriate agencies

SECURE SITE

- Control traffic
- Set up safe perimeter
- Post 24-hour security
- Refer media to spokesperson

Well Blowout

Examples:

- Loss of well control
- Rig collapse
- Uncontrollable fire (refer also to ***Fire/Explosion***)

PROTECT LIFE

- Follow Emergency Response Plans, if applicable
- Secure well and evacuate personnel and public to a safe point and isolate area
- Provide safe rescue of personnel
- Provide first aid: Call EMS
- Transport

MITIGATE SITUATION

- Shut off hazardous energy sources (ignition sources)
- Find closest valve to limit fuel to site (from pipelines, etc.)
- Transfer storage
- Protect surrounding areas (from fire, vapor cloud, etc.)
- Control spills – use damming/diversion techniques
- Monitor wind/weather

COMMUNICATE UP

- Employees - inform supervisors of emergency
- Supervisors - assess the situation and keep lines of communication open to both on-site employees and operations management
- Notify landowners
- Notify other operators in field. Provide input regarding the need for additional personnel, technical services, contract specialists, etc.
- Notify corporate management as appropriate as well as the Safety/Environmental Specialist
- Notify NYSDEC and other appropriate agencies

SECURE SITE

- Monitor wind/weather conditions
- Monitor explosive limits/plume
- Control traffic flow and parking
- Set up safe perimeter (Hot Zone/Entry Zone/Safe Zone)
- Set up command post
- Post 24-hour security
- Cooperate with law enforcement and appropriate agencies
- Refer media to spokesperson

Fire/Explosion

Examples:

- Facility Equipment fire (compressor, dehydrator, line heater, storage tanks)
- Equipment rupture – major uncontrolled gas release (refer also to ***Major Spill***)
- Lightning strike (refer also to ***Natural Disaster***)

PROTECT LIFE

- Follow Emergency Response Plans, if applicable
- Evacuate uninjured personnel and public to safe point
- Provide for safe rescue and treatment of injured
- Set up controlled entry into area with 24-hour security and road blocks as necessary

MITIGATE SITUATION

- Identify closest valves/other isolation devices
- Shut off or limit fuel to site (valves, pumps, equipment)
- Extinguish small fires (*DO NOT EXTINGUISH A LEAKING GAS FIRE UNLESS LEAK CAN BE STOPPED*)
- Transfer storage
- Identify the material(s) involved in the incident
- Monitor the air, water, and land at and around the incident scene, and collect samples for analysis and investigative purposes.

COMMUNICATE UP

- Inform supervisors
- Supervisors - assess situation.
- Keep communication lines open.
- Contact appropriate agencies
- Notify corporate management as appropriate as well as the Safety/Environmental Specialist
- Provide input regarding need for additional personnel, technical services, contract specialists
- Notify NYSDEC and other appropriate agencies

SECURE SITE

- Control traffic
- Establish a safe perimeter around the incident scene with barricades, barrier tape, rope, etc.
- Refer media to spokesperson

The fire department will control the fire, as well as determine whether any materials on or near the site pose an explosion or flammability hazard and then take appropriate control measures.

Major Spill or Release

Example:

- Major spill of oil/condensate/chemical to a land area or a body of water (lake, river, stream, pond, irrigation ditch, etc.)

PROTECT LIFE

- Follow Emergency Response and Spill Prevention, Containment and Countermeasure (SPCC) plans, if applicable
- Evacuate personnel and public to a safe point and isolate area.
- Prepare downstream; evacuation, and/or isolation, depending on extent of spill
- Provide safe rescue
- Provide first aid: Call EMS
- Transport/Direct EMS or meet at nearest lease road
- Protect the environment

MITIGATE SITUATION

- Shut off hazardous energy sources and find closest valve to limit fuel to and source of spill
- Transfer storage
- Use damming, berming, and/or diversion techniques
- Call appropriate agencies
- Start spill control operations
- Mobilize equipment (skimmers/floats, etc.)

COMMUNICATE UP

- Employees - inform supervisors of emergency
- Supervisors - assess the situation and keep lines of communication open to both on-site employees and operations management
- Provide input regarding the need for additional personnel, technical services, contract specialists, etc.
- Notify corporate management as appropriate as well as the Safety/Environmental Specialist
- Notify affected public
- Notify Landowner
- Notify NYSDEC and other appropriate agencies

SECURE SITE

- Control traffic
- Post 24-hour security as necessary
- Refer media to spokesperson

For most spills, isolating/evacuating the area, air monitoring, and spill confinement/containment are the primary emergency response priorities.

Natural Disaster

Example:

- Hurricane
- Tornado
- Flood
- Lightning (refer also to ***Fire/Explosion***)

PROTECT LIFE

- Secure the site and evacuate personnel and public to a safe point and isolate area
- Provide safe rescue of personnel
- Provide first aid: Call EMS
- Transport

MITIGATE SITUATION

- Shut off hazardous energy sources
- Call appropriate agencies
- Communicate up

COMMUNICATE UP

- Notify landowners.
- Employees - inform supervisors of emergency
- Supervisors - assess the situation and keep lines of communication open to both on-site employees and operations management
- Notify other operators in field.
- Provide input regarding the need for additional personnel, technical services, contract specialists, etc.
- Notify corporate management as appropriate as well as the Safety/Environmental Specialist
- Notify NYSDEC and other appropriate agencies

SECURE SITE

- Control traffic
- Post 24-hour security
- Refer media to spokesperson.
- Cooperate with law enforcement and appropriate agencies.

Workplace Violence

(Considered a ***Level 3 Incident***)

Example:

- Bomb Threat
- Assault

PROTECT LIFE

- Call 911
- Assess situation and set up controlled entry into area
- Evacuate personnel and public as necessary
- Contact appropriate control, emergency and rescue personnel
- Provide for safe rescue and treatment of injured/uninjured personnel directly involved

MITIGATE SITUATION

- Don't directly intervene
- Work with appropriate experts to control and terminate situation

COMMUNICATE UP

- Employees - contact supervisors
- Supervisors - assess the situation and keep lines of communication open
- Supervisors - notify management
- Contact building management/security
- Provide technical input
- Notify NYSDEC and other appropriate agencies

SECURE SITE

- Isolate the scene
- Refer media to spokesperson

FOLLOW UP

- Refer to **TIOGA Workplace Violence and Weapons at Work Policy**

APPENDIX C - INCIDENT, RELEASE & SPILL REPORTING GUIDELINES & FORMS

Incident, Release & Spill Reporting

Reportable Petroleum Spills

Petroleum spills must be reported to the NYSDEC if they meet any of the following conditions:

- The spill is known to be more than five (5) gallons,
- The spill is not contained and under control of the spiller,
- The spill has reached, or may be reasonably expected to reach, the State's water or any land; or
- The spill is not cleaned up within two (2) hours of discovery.

Report all reportable petroleum spills and most hazardous materials spills to the

NYSDEC Spill Hotline

(800) 457-7362 (24 hour)

(518) 457-7362 (24 hour, outside New York)

Non-reportable Petroleum and Hazardous Materials Spills

For spills not deemed reportable, it is strongly recommended that the facts concerning the incident be documented by the spiller and a record maintained for one (1) year.

A spill is considered to have not impacted land if it occurs on a paved surface such as asphalt or concrete.
A spill in a dirt or gravel parking lot is considered to have impacted land and is reportable.

Release of Reportable Quantity of a Hazardous Substance

Report the release of a reportable quantity of a hazardous substance, or, if any of the following conditions exist, the release of a lesser quantity of a hazardous substance:

- The release results, or may reasonably be expected to result, in a fire with potential off-site impacts,
- The release which causes, or may reasonably be expected to cause, an explosion;
- The release which causes, or may reasonably be expected to cause, a contravention of air quality standards;
- The release which results, or may reasonably be expected to result, in vapors, dust and/or gases that may cause illness or injury to persons, not including persons in a building at the facility where a release originates; or when
- Runoff from fire control or dilution waters may cause or contribute to a contravention of water quality standards.

This release report must be made, within two (2) hours of the release, to the

NYSDEC Spill Hotline
(800) 457-7362 (24 hour)
(518) 457-7362 (24 hour, outside New York)

Reporting is not required for a release that is continuous and stable in quantity and rate, provided that written notification which meets the requirements of 40 CFR §302.8 has been provided to the department.

Refer to the Spill Prevention, Containment and Countermeasure (SPCC) Plan for the Snyder E 1/1A for additional release reporting guidelines and procedures.

Suspected or Probable Spills

Report a suspected or probable release of a hazardous substance (unless an investigation shows that a release has not occurred or does not need to be reported as a release of a reportable quantity of a hazardous substance) when any of the following conditions exist:

- Test, sampling, or monitoring results from a release detection method that indicate a release may have occurred;
- Unusual operating conditions such as the erratic behavior of product dispensing equipment, the sudden loss of product from a storage tank, an unexpected presence of water in a tank, or the physical presence of a hazardous substance or an unusual level of vapors on a site that are of unknown origin;
- Impacts in the surrounding area, such as evidence of hazardous substances or resulting vapors in soils, basements, sewer and utility lines, and nearby surface waters; or
- Any other conditions or indications of a suspected release.

This suspected or probable spill report must be made, within 24-hours of discovery of the condition, to the

NYSDEC Spill Hotline

(800) 457-7362 (24 hour)

(518) 457-7362 (24 hour, outside New York)

If within 24 hours of the discovery of a suspected release it is confirmed that a release has not occurred, then such release does not have to be reported.

Refer to the SPCC Plan for the Snyder E 1/1A for additional release reporting guidelines and procedures.

Other Incidents, Spills and/or Releases Requiring Notification

In addition to the aforementioned notices required, the following table details additional notifications which may be required.

MATERIALS COVERED	REGULATION	AGENCY TO NOTIFY	WHAT MUST BE REPORTED & WHEN	WHO MUST REPORT
Petroleum from any source	Navigation Law Article 12; 17 NYCRR §32.3 and §32.4	**DEC Hotline** **1-800-457-7362**	The notification of a discharge **must be immediate, but in no case later than two hours after** discharge. 1. Name of person making report and his relationship to any person which might be responsible for causing the discharge. 2. Time and date of discharge. 3. Probable source of discharge. 4. The location of the discharge, both geographic and with respect to bodies of water. 5. Type of petroleum discharges. 6. Possible health or fire hazards resulting from the discharge. 7. Amount of petroleum discharged. 8. All actions that are being taken to clean up and remove the discharge. 9. The personnel presently on the scene. 10. Other government agencies that have been or will be notified.	Any person causing discharge of petroleum. Owner or person in actual or constructive control must notify DEC unless that person has adequate assurance that such notice has already been given.
All aboveground petroleum and underground storage facilities with a combined storage capacity of over 1,100 gallons.	ECL §17-1007; 6 NYCRR §613.8	**DEC Hotline** **1-800-457-7362**	1. Report spill incident **within two hours of discovery.** 2. Also when results of any inventory, record, test, or inspection shows a facility is leaking, that fact must be reported within two hours of discovery.	Any person with knowledge of a spill, leak, or discharge.
Petroleum contaminated with PCB.	Chemical Bulk Storage Act 6 NYCRR Parts 595,596, 597	**DEC Hotline** **1-800-457-7362**	Releases of a reportable quantity of PCB oil.	Owner or person in actual or constructive possession or control of the substance, or a person in contractual relationship, who inspects, tests, or repairs for owner.

INCIDENT, RELEASE & SPILL REPORTING GUIDELINES & FORMS

MATERIALS COVERED	REGULATION	AGENCY TO NOTIFY	WHAT MUST BE REPORTED & WHEN	WHO MUST REPORT
Any liquid (petroleum included) that if released would be likely to pollute lands or waters of the state.	ECL §17-1743	**DEC Hotline 1-800-457-7362**	**Immediate notification** that a spill, release, or discharge of any amount has occurred.	Owner or person in actual or constructive possession or control of more than 1,100 gallons of the liquid.
Petroleum Discharge in violation of §311(b)(3) of the Clean Water Act	40 CFR §110.10 (Clean Water Act)	1. **National Response Center (NRC) 1-800-424-8802.** 2. If not possible to notify NRC, notify **Coast Guard or predesignated on-scene coordinator**. 3. If not possible to notify either 1 or 2, reports may be made immediately to **nearest Coast Guard units,** provided NRC notified as soon as possible.	**Immediate notification as soon as there is knowledge** of an oil discharge that violates water quality standards or causes sheen on navigable waters. Procedures for notice are set forth in 33 CFR Part 153, Subpart B, and in the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300, Subpart E.	Person in charge of vessel or on-shore or off-shore facility.
Petroleum, petroleum by-products or other dangerous liquid commodities that may create a hazardous or toxic condition spilled into navigable waters.	33 CFR §126.29 (Ports and Waters Safety Act)	**Captain of the Port** or **District Commander**	**As soon as discharge occurs**, owner or master of vessel must immediately report that a discharge has occurred.	Owner or master of vessel or owner or operator of the facility at which the discharge occurred.

INCIDENT, RELEASE & SPILL REPORTING GUIDELINES & FORMS

MATERIALS COVERED	REGULATION	AGENCY TO NOTIFY	WHAT MUST BE REPORTED & WHEN	WHO MUST REPORT
Petroleum or hazardous substance from a vessel, on-shore or off-shore facility in violation of §311(b)(3) of the Clean Water Act.	33 CFR §153.203 (Clean Water Act)	1. **NRC U.S. Coast Guard, 2100 Second Street, SW, Washington, DC 20593; 1-800-424-8802.** 2. Where direct reporting not practicable, reports may be made to the **Coast Guard (District Offices), the 3rd and 9th district of the EPA regional office 26 Federal Plaza, NY, NY 10278; 1-201-548-8730.** 3. Where none of the above is possible, may contact **nearest Coast Guard unit,** provided NRC notified as soon as possible.	Any discharger shall **immediately notify** the NRC of such discharge.	Person in charge of vessel or facility.
Any hazardous substance pursuant to Article 37. **Does not include petroleum.**	Chemical Bulk Storage Act 6 NYCRR § 595,596, 597; ECL 40-0113(d)	**DEC Hotline 1-800-457-7362**	Releases of a reportable quantity of a hazardous substance.	Owner or person in actual or constructive possession or control of the substance, or a person in contractual relationship, who inspects, tests, or repairs for owner.
Hazardous materials or substances as defined in 49 CFR §171.8 that are transported. See federal reporting requirements.	Transportation Law 14(f); 17 NYCRR 507.4(b)	**Local fire department** or **Police department** or **Local municipality** Refer to Emergency Call Lists	**Immediate notification** must be given of incident in which any of the following occurs as a direct result of a spill of hazardous materials: 1. Person is killed. 2. Person receives injuries requiring hospitalization. 3. Estimated damage to carrier or other property exceeds $50,000. 4. Fire, breakage, spillage, or suspected contamination due to radioactive materials. 5. Fire, breakage, spillage, or suspected contamination involving etiologic agents. 6. Situation is such that, in the judgment of the carrier, a continuing danger to life or property exists at the scene of the incident.	All persons and carriers engaged in the transportation of hazardous materials.

INCIDENT, RELEASE & SPILL REPORTING GUIDELINES & FORMS

MATERIALS COVERED	REGULATION	AGENCY TO NOTIFY	WHAT MUST BE REPORTED & WHEN	WHO MUST REPORT
Reportable quantity of a hazardous substance into navigable waters or adjoining shorelines. Substances are listed in 40 CFR §302.4.	Department of Transportation Regulations 49 CFR§171.16 as authorized by the Hazardous Materials Transportation Act	**U.S. Coast Guard National Response Center (NRC), 1- 800-424-8802** or **1- 202-267-2675**	**As soon as the person in charge becomes aware** of a spill incident, he must notify NRC and provide the following information: 1. The information required by 49 CFR §171.15 (see above). 2. Name of shipper of hazardous substance. 3. Quantity of hazardous substance discharged, if known. 4. If person in charge is incapacitated, carrier shall make the notification. 5. Estimate of quantity of hazardous substance removed from the scene and the manner of disposition of any unremoved hazardous substance shall be entered in Part (H) of the report required by 49 CFR §171.16.	Person in charge of aircraft, vessel, transport vehicle, or facility. Must inform NRC directly, or indirectly through carrier.
Reportable quantity of a hazardous substance from vessel, on-shore or off-shore facility. Substances and requirements specified in 40 CFR §117.3.	40 CFR §117.21 as authorized under the FWPCA	**NRC 1-800-424-8802.** If not practicable report may be made to the **Coast Guard (3rd or 9th Districts) District Offices** or to **EPA, designated On-Scene Coordinator, Region II, 26 Federal Plaza, NY, NY 10278; 1-201-548-8730**	**Immediate notification is required.**	Person in charge of vessel, or on-shore or off-shore facility
Hazardous liquids transported in pipelines, a release of which results in any circumstances as set out in §195.50(a) through (f). Also any incident that results in circumstances listed in §195.52(g).	49 CFR §§195.50,195.52 and 195.54 (Hazardous Liquid Pipeline Safety Act)	**NRC** **1-800-424-8802**	**Notice must be given at the earliest practicable moment** and the following information provided: 1. Name and address of the operator. 2. Name and telephone number of the reporter. 3. Location of the failure. 4. The time of the failure. 5. The fatalities and personal injuries, if any. 6. All other significant facts known by the operator that are relevant to the cause of the failure or extent of the damages.	Operator of system.

INCIDENT, RELEASE & SPILL REPORTING GUIDELINES & FORMS

MATERIALS COVERED	REGULATION	AGENCY TO NOTIFY	WHAT MUST BE REPORTED & WHEN	WHO MUST REPORT
Hazardous wastes in transport	40 FR §263.30(a) (RCRA)	**1. Local authorities** **2.** If required by 49 CFR §171.15, notify the **NRC 1-800-424- 8802 or 1-202- 426-2675** **3.** Report in writing to **Director of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590** Refer to Emergency Call Lists	**Notification must be immediate.** For discharge of hazardous waste by air, rail, highway, or water, the transporter must: 1. Give notice as in 49 CFR §161.15 (if applicable). 2. Report in writing as in 49 CFR §171.16. Wastes transporter (bulk shipment) must give same notice as required by 33 CFR §153.20.	Transporter by air, rail, highway, or water
Hazardous materials (wastes included) that are transported, whose carrier is involved in an accident.	Department of Transportation Regulations 49 CFR §171.15; 17 NYCRR Part 924; 17 NYCRR Part 507	1. **U.S. Department of Transportation 1-800-424-8802** **2. DEC Hotline 1-800-457-7362** 3. **Rail Carrier On-Duty 518- 457-1046 Off-Duty 518-457-6164** **4. Notify local police** or **fire department.** Refer to Emergency Call Lists	Notice should be given by telephone at the **earliest practicable moment** and should include: 1. Name of reporter. 2. Name and address of carrier represented by reporter. 3. Phone number where reporter can be contacted. 4. Date, time, and location of incident. 5. The extent of injuries, if any. 6. Classification, name and quantity of hazardous materials involved, if available. 7. Type of incident and nature of hazardous material involved and whether a continuing danger to life exists at scene. 8. Each carrier making this report must also make the report required by §171.16.	Each carrier that transports hazardous materials involves in an accident that causes any of the following as a direct result: 1. A person is killed 2. A person receives injuries requiring hospitalization 3. Estimated damage to carrier or other property exceeds $50,000 4. Fire, breakage, spillage, or suspected contamination due to radioactive materials 5. Fire, breakage, spillage, suspected contamination involving etiologic agents. 6. Situation is such that carrier thinks it should be reported.

INCIDENT, RELEASE & SPILL REPORTING GUIDELINES & FORMS

MATERIALS COVERED	REGULATION	AGENCY TO NOTIFY	WHAT MUST BE REPORTED & WHEN	WHO MUST REPORT
Facilities where a hazardous chemical is produced, used, or stored, and there is a reportable quantity of any extremely hazardous substance as set out in Appendix A to 40 CFR 355 or a CERCLA hazardous substance as specified in 40 CFR 302.4. (This section does not apply to a release that does not go beyond the facility, that emanates from a facility that is federally permitted, is continuous as defined under §103(f) of CERCLA or to any release exempt from CERCLA §103(a) reporting under §101(22) of CERCLA.)	40 CFR §355.40 (SARA) Releases of CERCLA Hazardous Substances are subject to release reporting requirements of CERCLA §103, codified at 40 CFR Part 302, in addition to being subject to the requirements of this Part.	**Community emergency coordinator for the local emergency planning committee (LEPC) of any area likely to be affected** and the **State Emergency Response Commission** of any state likely to be affected by the release. If there is no local emergency planning commission notification shall be made to relevant local emergency response personnel.	**Immediately** notify agencies at left and provide the following information when available: 1. Chemical name or identity of any substance involved in the release. 2. Indication of whether the substance is an extremely hazardous substance. 3. An estimate of the quantity released. 4. Time and duration of release. 5. Medium or media into which the release occurred. 6. Known health risks associated with emergency and where appropriate advice regarding medical attention for those exposed. 7. Proper precautions/actions that should be taken, including evacuation. 8. Names and telephone numbers of person to be contacted for further information. As soon as practicable after release, follow-up notification by providing the following information: 1. Owner or operator of facility 2. Actions taken to respond to and contain the release. 3. Health risks. 4. Advice on medical attention for exposed individuals.	Owner or operator of facility
Low Level radioactive wastes in transport: Any suspected or actual uncontrolled releases.	6 NYCRR 381.16 ECL §27-0305 Waste Transporter Permits	**DEC** and **Department of Health**	**Immediate notification.**	Transporter
Vinyl Chloride from any manual vent valve, or polyvinyl chloride plants	Clean Air Act 40 CFR §61.64	**Administrator of EPA**	**Within 10 days of any discharge from any manual vent valve,** report must be made, in writing, and the following information provided: 1. Source, nature and cause of the discharge 2. Date and time of the discharge 3. Approximate total vinyl chloride loss during discharge 4. Method used for determining loss 5. Action taken to prevent the discharge 6. Measures adopted to prevent future discharges.	Owner or operator of plant.

MATERIALS COVERED	REGULATION	AGENCY TO NOTIFY	WHAT MUST BE REPORTED & WHEN	WHO MUST REPORT
Radioactive Materials	6 NYCRR §380.7	**Commissioner of DEC**	**Notify immediately** by telephone when concentration, averaged over a 24-hour period, exceeds or threatens to exceed 5000 times the limits set forth in Schedule 2 of 380.9 (in uncontrolled areas). **Notify within 24 hours** by telephone when concentration, averaged over 24- hour period, exceeds or threatens to exceed 500 times the limits set forth in Schedule 2 above (in uncontrolled areas). **Report within 30 days** the concentration and quantity of radioactive material involved, the cause of the discharge, and corrective steps taken or planned to ensure no recurrence of the discharge.	Operator of the radiation installation.

Non-Routine Incident Reports Required

Reclamation of the land surrounding the Snyder E 1/1A well site, and the drilling, casing, operation, plugging and replugging, and completion, including hydraulic fracturing and flowback operations, of the Snyder E 1/1A well shall be performed in accordance with applicable regulation, and shall be performed in a manner so as to prevent or remedy the following, including but not limited to:

- The escape of oil, gas, brine or water out of one stratum into another;
- The intrusion of water into oil or gas strata other than during enhanced recovery operations; the pollution of fresh water supplies by oil, gas, salt water or other contaminants; and
- Blowouts, cavings, seepages and fires.

Non-Routine Incidents

Report, immediately (within two (2) hours of discovery of the non-routine incident), any of non-routine incident, including but not limited, to:

- Casing and drill pipe failures,
- Casing cement failures,
- Fishing jobs,
- ***Fires***,
- Seepages, and
- Blowouts and other incidents during drilling, completion, producing, plugging or replugging operations that may affect the health, safety, welfare or property of any person.

The ***Non-Routine Incident Report*** shall be made to:

NYSDEC – Region 8, Avon
Attn: Ms. Linda Collart, Regional Minerals
(585) 226-5376 or (585) 226-2466
(585) 226-9034 (fax)

Submit, within one (1) day of event, follow-up report on NYSDEC ***Non-Routine Incident Report Form*** (located at the end of this section) outlining full details of event requiring notification described above.

Fires at Oil or Gas Wells

Report all current details of fires, including those occasioned by discharges of lightning, which occur at oil or gas wells or tanks or receptacles.

This fire report shall be made immediately (within two (2) hours), either verbally or by telegram to the regional headquarters (NYSDEC) administering to the county in which the fire described above has occurred.

NYSDEC – Region 8, Avon
Attn: Ms. Linda Collart, Regional Minerals
(585) 226-5376 or (585) 226-2466
(585) 226-9034 (fax)

Submit, within one (1) day of event, follow-up report on NYSDEC ***Non-Routine Incident Report Form*** (located at the end of this section) outlining full details of event requiring notification described above.

Oil and Gas Facility Breaks or Leaks

Report any breaks or leaks in or from tanks or receptacles and pipelines from which oil or gas production or products is escaping or has escaped when the oil or gas loss creates a fire or pollution hazard or exceeds 100 barrels of oil in the aggregate, or three (3) million cubic feet (3 MMCF) of gas in the aggregate. This report should include the following elements:

- Location of the well, tank, receptacle or line break,
- Description of steps that have been taken or are in progress to remedy the situation reported, and
- Details regarding the quantity of oil or gas lost, destroyed or permitted to escape.

This break or leak report shall be made immediately, either verbally or by telegram the regional headquarters (NYSDEC) administering to the county in which the leak or break described above has occurred.

NYSDEC – Region 8, Avon
Attn: Ms. Linda Collart, Regional Minerals
(585) 226-5376 or (585) 226-2466
(585) 226-9034 (fax)

In case any tank or receptacle is permitted to run over, the escape thus occurring shall be reported as in the case of a leak.

Drilling Notices Required

Pre-Spud

Pursuant to 6 NYCRR §554, Drilling Practices and Reports, the regional headquarters (NYSDEC) administering to the county in which the well is located shall be notified in writing or by telegram at or prior to the start of actual drilling operations.

NYSDEC – Region 8, Avon
Attn: Ms. Linda Collart, Regional Minerals
(585) 226-5376 or (585) 226-2466
(585) 226-9034 (fax)

Said notice should include the following information:

a) Date the well will be spudded,
b) Name of the Drilling Contractor,
c) Rig number, and
d) API Well Number.

Additionally, TIOGA shall, by certified mail, give notice prior to spudding the Snyder E 1/1A to:

a) Any Local Government affected by the drilling operation (County, Town, City officials), and
b) Any surface owner affected by the drilling operation.

Total Depth

TIOGA shall notify the appropriate NYSDEC office when Drilling has Reached Total Depth.

NYSDEC – Region 8, Avon
Attn: Ms. Linda Collart, Regional Minerals
(585) 226-5376 or (585) 226-2466
(585) 226-9034 (fax)

Said notice shall include

a) Date drilling ended.
b) Name of the Drilling Contractor.
c) True Vertical Depth (TVD) and True Measured Depth (TMD).
d) API Well Number.

Completion

Within thirty (30) days after the well has been completed (after stimulation and testing), TIOGA shall file a Completion Report Form [85-15-17 (3/87)] containing all requested information and two copies of all logs run on the well.

Temporary Abandonment

If within ninety (90) days after drilling operations have stopped (removal of drill rig) the Snyder E 1/1A is not completed (stimulated and tested) TIOGA shall file for Temporary Abandonment Status with the appropriate NYSDEC regional office.

NYSDEC – Region 8, Avon

Attn: Ms. Linda Collart, Regional Minerals

(585) 226-5376 or (585) 226-2466

(585) 226-9034 (fax)

During Drilling, Completion, Production or Plugging Operations

During drilling, completion, production or plugging operations, TIOGA shall report ALL non-routine incidents (drill pipe failures, casing failures, cement failures, fires, blowouts, spills, etc.) by (1) telephone, and (2) by written report on ***Non-Routine Incident Report Form*** giving all details to the appropriate NYSDEC regional office; refer to ***Non-Routine Incident Reports Required***.

Supplementary Wildcat Drilling Provision Required Notices

TIOGA shall make the following notifications, as applicable, as required by the NYSDEC's "Wildcat Supplementary Permit Conditions", a copy of which has been attached as ***APPENDIX G*** -

Well Prognosis

Prior to spudding the Snyder E 1/1A, TIOGA shall provide the drilling company with a well prognosis indicating anticipated formation top depths with appropriate warning comments. The prognosis must be reviewed by all crew members and posted in a prominent location in the doghouse. TIOGA shall revise the prognosis and inform the drilling company in a timely manner if drilling reveals significant variation between the anticipated and actual geology and/or formation pressures.

Well's Location & Potential Hazards

Prior to spudding the Snyder E 1/1A, the Tioga county emergency management office shall be notified of the well's location and the potential hazards involved as follows:

- Prior to spudding the well,
- Prior to penetrating a target formation,
- During any flaring while drilling and
- Prior to flaring for well clean-up, treatment or testing.

Target Formation

TIOGA shall notify a representative of the NYSDEC six (6) hours prior to penetrating the target formation. TIOGA or TIOGA's designated representative, will be on site when drilling operations place the drill bit 100' (True Vertical Depth) from the target formation and throughout the drilling of the target formation.

BOP Testing

The BOP, choke manifold and surface casing must be tested to a minimum of 1000 psi prior to drilling out the surface casing shoe, unless the NYSDEC grants a waiver in response to a written request from TIOGA which demonstrates to the NYSDEC's satisfaction that:

a) The well is proposed as a deep wildcat that will be drilled through an established, shallow, low pressure pool and
b) The well will have an intermediate casing string that is the first string intended for well control purposes.

When intermediate casing is used, the BOP, choke manifold and intermediate casing must be tested to at least the maximum anticipated shut-in surface pressure plus a 5% safety factor prior to drilling out the intermediate casing shoe.

A representative of the NYSDEC must be notified six (6) hours prior to each test and a NYSDEC representative may be present during the test. If the NYSDEC representative is not on location at the agreed time, the test may proceed with the results of the test and the name of the witness being noted in the driller's log.

Stormwater Pollution Prevention Plan (SWPPP) Required Notices

Prior to the commencement of construction activity at the Snyder E 1/1A well site, TIOGA shall submit the “Notice of Intent (NOI) for Stormwater Discharges Associated with Construction Activity under SPDES General Permit (Permit No. GP-0-15-002)” to NYSDEC.

Once the Snyder E 1/1A well site has stabilized and vegetation established, and the site has been inspected by a qualified professional, and all temporary erosion control measures are removed, TIOGA shall submit the “Notice of Termination (NOT) for Stormwater Discharges Associated with Construction Activity under SPDES General Permit (By Operator)” to NYSDEC.

For additional guidance regarding the Stormwater Pollution Prevention Plan (SWPPP) required notices, refer to the SWPPP for the Snyder 1 E/1A well site.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF MINERAL RESOURCES

NON-ROUTINE INCIDENT REPORT

Instructions: *Print or type in black ink. Use of this form supplements two-hour oral notification of a non-routine incident. This form must be completed and submitted to the appropriate DEC Oil and Gas Regional Minerals Manager (see well permit or http://www.dec.ny.gov/about/34315.html) within twenty-four (24) hours of discovery of the incident. If an Interim Report is submitted, it must always be followed by a Final Report filed at a later date. Completion and submittal of this report form fulfills only ECL Article 23 and 6 NYCRR Parts 550 – 559 reporting requirements. The owner or operator must also comply with any other applicable statutes and regulations of the Department, including reporting to the DEC Spills Hotline if required. For additional assistance with completing this form, contact the appropriate Regional office.*

WELL NAME AND NUMBER OR FACILITY (only provide facility if incident not associated with well)	API WELL IDENTIFICATION NUMBER 31 - - -
NAME OF OWNER (Full Name of Organization or Individual as registered with the Division)	OWNER'S ADDRESS (P.O. Box or Street Address, City, State, Zip Code)
TELEPHONE NUMBER (include area code)	

1. TYPE OF REPORT

   Interim ☐ Check "Interim" if event is ongoing OR if all associated spill/release and recovery operations have not been completed OR if incident reporter is not an Authorized Representative listed in Box 7 of the owner's Organization Report on file with DEC.

   Final ☐ Check "Final" if event has ceased AND all associated spill/release and recovery operations have been completed AND incident report filer is an Authorized Representative listed in Box 7 of the owner's Organizational Report on file with DEC.

2. LOCATION OF INCIDENT County: _____ Town: _____

   Decimal Latitude (NAD 83): ☐☐.☐☐☐☐☐☐ Decimal Longitude (NAD 83): ☐☐.☐☐☐☐☐☐

3. INCIDENT OCCURRENCE Date ___/___/___ Time ___:___ AM/PM

   Estimated ☐ or Known ☐ (check appropriate box)

4. INCIDENT DISCOVERY Date ___/___/___ Time ___:___ AM/PM

5. INCIDENT INITIALLY CONTROLLED Date ___/___/___ Time ___:___ AM/PM

6. TYPE OF INCIDENT (check all boxes that describe incident)

   Surface Blowout ☐ Fire ☐ Spill/Release ☐ Downhole ☐, specify: _____

   Other ☐, specify: _____

7. ASSOCIATED SPILL/RELEASE AND RECOVERY (as of this report date)

Fluid Type	Total Volume Released	(check appropriate box)	Total Volume Recovered	(check appropriate box)
Oil	Bbls	Estimated ☐ or Known ☐	Bbls	Estimated ☐ or Known ☐
Brine	Bbls	Estimated ☐ or Known ☐	Bbls	Estimated ☐ or Known ☐
Gas	Mcf	Estimated ☐ or Known ☐	Mcf	Estimated ☐ or Known ☐
Other (specify)		Estimated ☐ or Known ☐		Estimated ☐ or Known ☐

8. Estimated area affected (sq. ft.) _____

   Was any surface water affected? Yes ☐ No ☐
   If "Yes," describe _____

   Was there any personal injury? Yes ☐ No ☐
   If "Yes," describe _____

NON-ROUTINE INCIDENT REPORT

9. Detailed Description of Incident (check box if additional page(s) attached) ☐:

10. Description of Initial Corrective Actions (check box if additional page(s) attached) ☐:

11. Description of Proposed Corrective Action Plan (CAP). If additional time is requested to formulate the CAP, state so below and include a time frame for submittal of the CAP. (check box if additional page(s) attached) ☐:

12. Agency Name, Staff Name, Date and Time of Other Notification(s) to NYSDEC Divisions and/or Other Local, State and Federal Agencies (check box if additional page(s) attached) ☐:

Printed or Typed Name and Affiliation of Incident Reporter or Authorized Representative (see below note)

Signature of Incident Reporter or Authorized Representative (see below note)	Date _____ / _____ / _____

Note: Only an Authorized Representative listed in Box 7 of the Organizational Report on file with the Division of Mineral Resources may sign a "Final" report.

APPENDIX D - FACILITY INFORMATION

Project Description

Tioga Energy Partners, LLC proposes to drill the Snyder E 1 & 1A (Project). The Snyder E 1 is a stratigraphic test well which will be drilled into the Utica formation. Once drilled, the well will be plugged back to the Marcellus formation, from where TIOGA will conduct horizontal drilling operations (Snyder 1A) into the Marcellus formation and will utilize propane waterless hydraulic fracturing (WLHF) to stimulate the well.

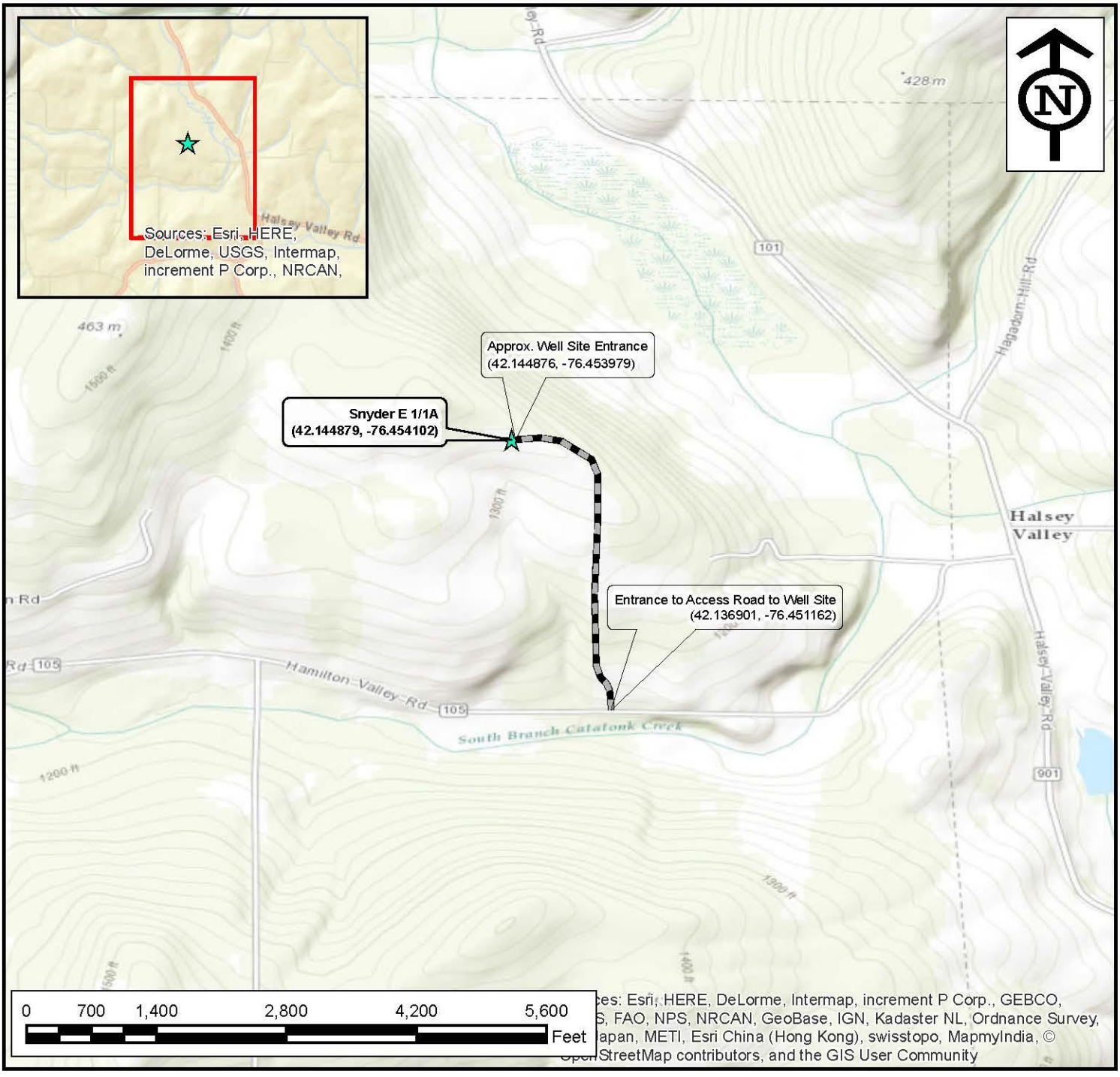
The project site is approximately 9.6 acres in size and is located at 233 Hamilton Valley Road (Lockwood, NY 14859) in the Town of Barton, Tioga County, New York.

The project site is currently accessed through a partial gravel/compacted earth farm road off of Hamilton Valley Road. The initial 50 feet of the access road shall be paved to protect Hamilton Valley Road. (The location of the project site access road is indicated on the maps that follow.)

911 Address

Snyder E1/1A
233 Hamilton Valley Road
(Lockwood, NY 14859)
Town of Barton, Tioga County, NY

Overview Map



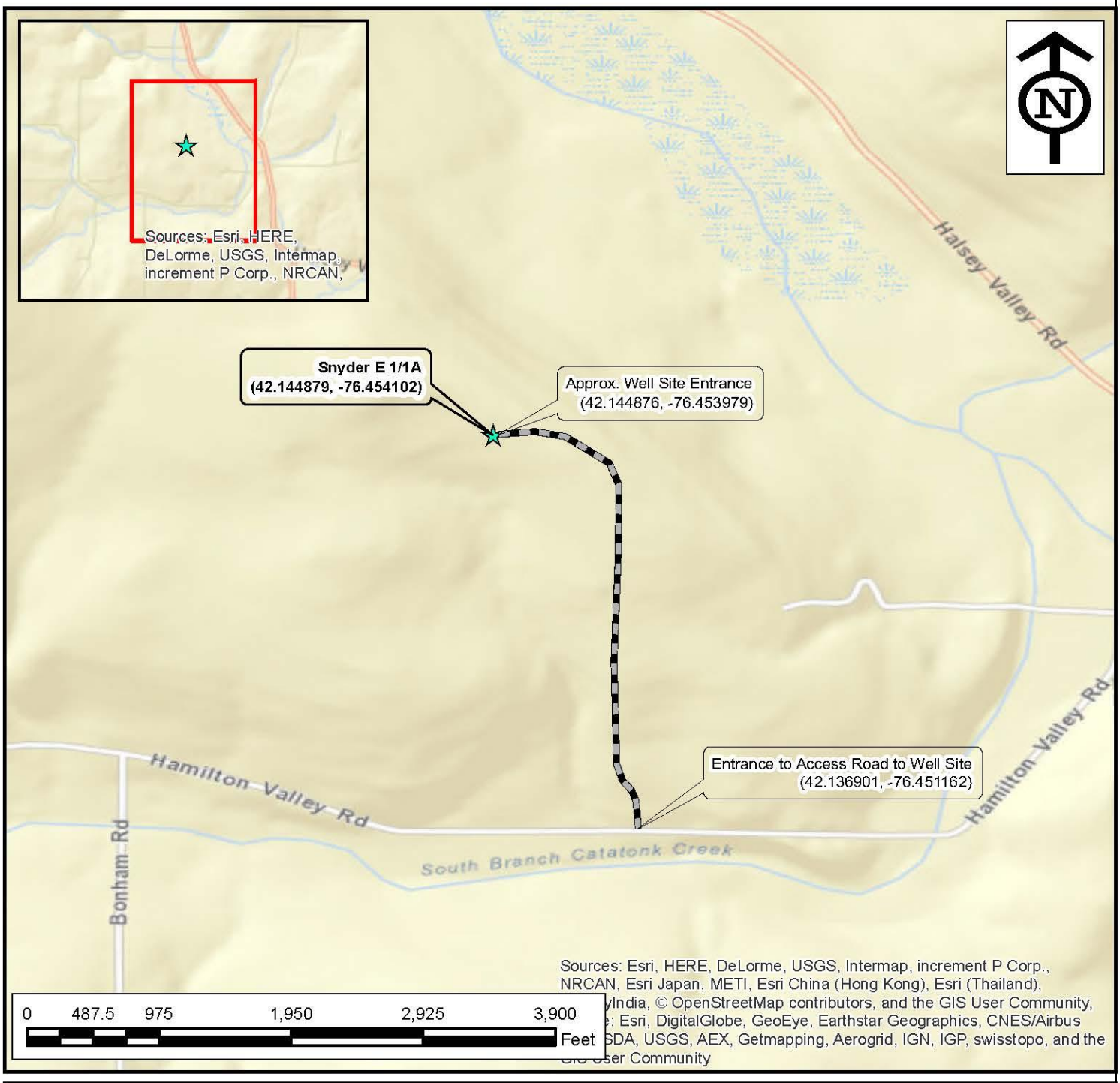
Tioga Energy Partners, LLC

SNYDER E 1/1A

233 Hamilton Valley Road
(Lockwood, NY 14859)
Town of Barton, Tioga County, NY

Legend
- SNYDER E 1/1A SHL
- ACCESS ROAD TO SITE

Street Map



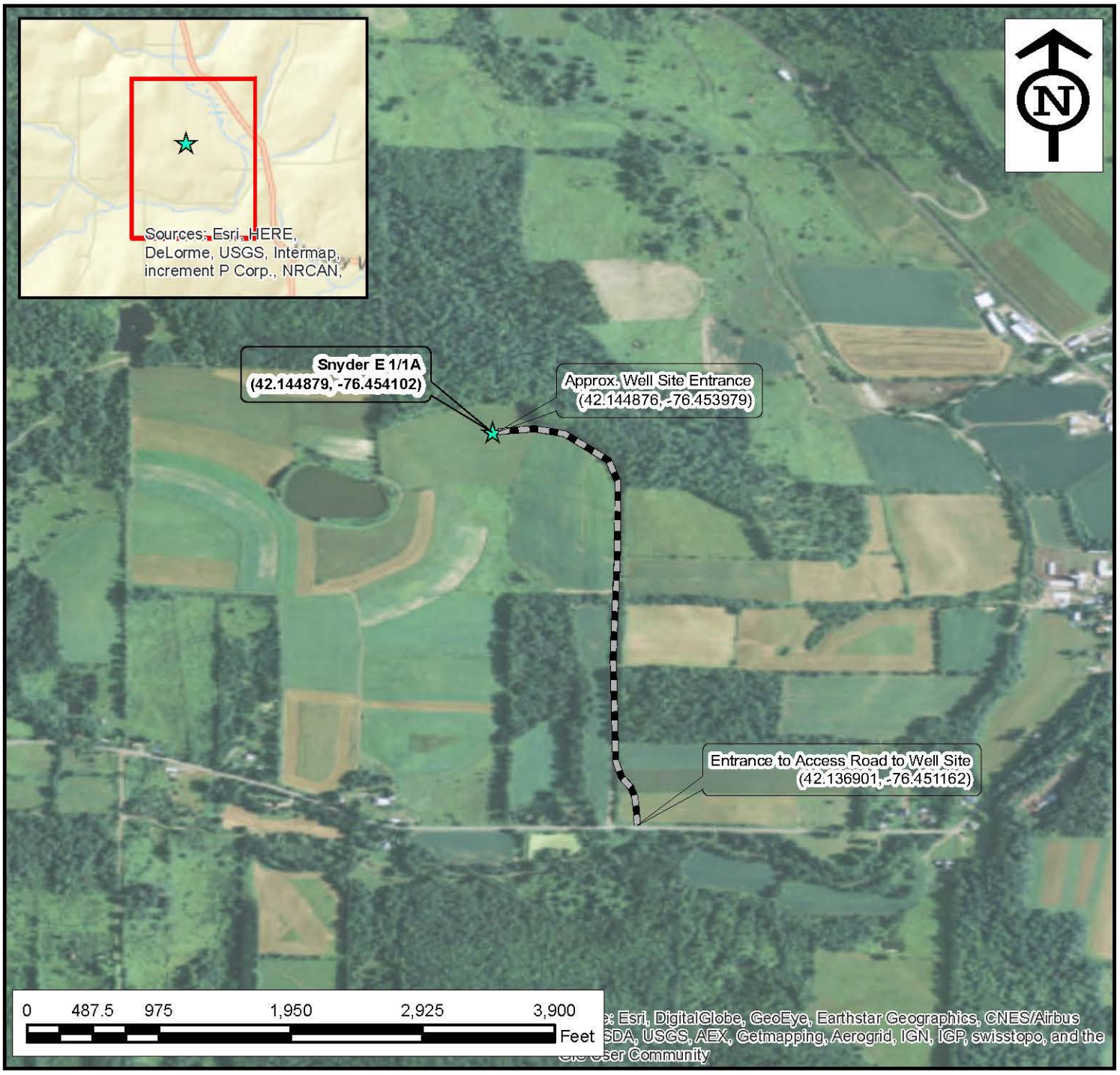
Tioga Energy Partners, LLC

SNYDER E 1/1A

233 Hamilton Valley Road
(Lockwood, NY 14859)
Town of Barton, Tioga County, NY

Legend
- SNYDER E 1/1A SHL
- ACCESS ROAD TO SITE

Well Site Access Map



Tioga Energy Partners, LLC

SNYDER E 1/1A

233 Hamilton Valley Road
(Lockwood, NY 14859)
Town of Barton, Tioga County, NY

Legend
- SNYDER E 1/1A SHL
- ACCESS ROAD TO SITE

Document Name: TIOGA_ERP_2015-07-20
Date: 10/16/2015
Coordinate System: GCS North American 1983

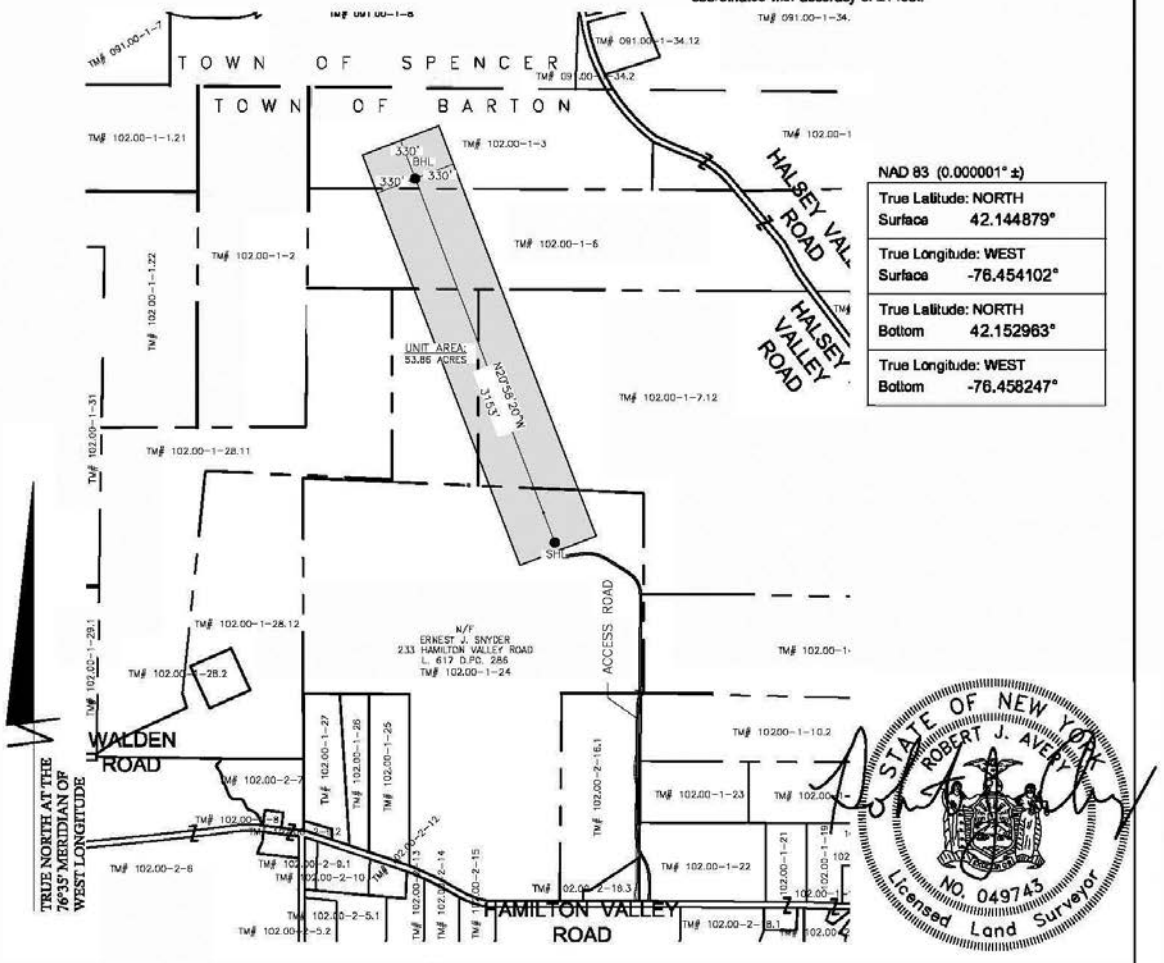
FACILITY INFORMATION

NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF MINERAL RESOURCES
WELL LOCATION PLAT

WELL LOCATION PLAT
SNYDER E 1A
(MARCELLUS FORMATION)

NOTE: This plat is for well location purposes only and does not represent a complete boundary survey. Corners and lines pertinent to locating the well are from field survey. Other lines and features are from tax maps, aerial photographs and/or deeds.

Survey was preformed with dual-frequency (L1+L2) GPS equipment. An RTK unit was used and processed against a NYSDOT CORS-corrected network base to achieve x,y coordinates with accuracy of ±1 foot.



NAD 83 (0.000001° ±)	
True Latitude: NORTH Surface	42.144879°
True Longitude: WEST Surface	-76.454102°
True Latitude: NORTH Bottom	42.152963°
True Longitude: WEST Bottom	-76.458247°

STATE OF NEW YORK
ROBERT J. AVERY
NO. 049743
Licensed Land Surveyor

Applicant / Well Operator Name: TIOGA ENERGY PARTNERS, LLC c/o ADAM SCHULTZ, ESQ.	Well (Farm) Name: SNYDER E	Well#: 1A	Unit Acreage: 53.86 ACRES
Address: P.O. BOX 22222 ALBANY, NEW YORK 12201	County Code: TIOGA	Town: BARTON	
Surface Landowner / Lessor: ERNEST J. SNYDER	USGS 7½ Quadrangle Map Name: SPENCER NY QUADRANGLE	Map Section: H	
Address: 233 HAMILTON VALLEY RD, LOCKWOOD, NY 14859	Angle & Course of Deviation (Drilling): N20°58'20"W	Surface Elevation: 1345	Anticipated Total Depth: TVD 3653; TMD 6600
Surface Owner or Water Purveyor with a Water Supply within 1,000 ft / Approximate Course and Distance to Water Supply	Surveyor or Engineer: ROBERT J. AVERY PLS #049743 Arrowpoint Land Surveyors 1255 University Avenue, Suite 240, Rochester, NY 14607 (585) 755-0406 Date: MAY18, 2015 REVISION 2 Scale: 1" = 1200'	DEC USE ONLY	Reviewed by Permit# Project# Field Name

APPENDIX E - SECURITY, SIGNS & SAFETY EQUIPMENT

Site Security

During drilling and completion operations, including hydraulic fracturing & flowback operations, access to the Snyder E 1/1A well site will be restricted to the general public. A gate guard will be posted at the main entrance of the well site and will grant access to the well site. The gate guard will maintain a log of all visitors (including personnel and contractors) to site, noting arrival and departure times. Additionally, a 'No Trespassing' sign will be posted at the gate.

Signs

Lease and Well Sign

TIOGA shall construct a conspicuous, weatherproof sign where the principal lease road enters the lease. Said sign shall show the name of the lease owner or operator (TIOGA), an emergency contact telephone number, the name of the lease, and the lease location as to township.

Wellhead Identification Signs

TIOGA shall attach or paint a legible, identifying numeral on the wellhead, along with a sign at the wellhead identifying the name of the lease owner or operator, well name and number, API number and emergency contact phone number. Alternatively, a legible, identifying sign shall be placed near each well.

Warning Signs

Warning signs shall be strategically placed around the well site.

Most warning signs located at the well site will be black, white and/or red and will contain the words "WARNING" or "DANGER"; "NO TRESPASSING" and "NO SMOKING" signs shall also be utilized.

Examples of warning signs, and their respective location, utilized are listed in the table below.

Warning Sign	Sign Location
Authorized Personnel/No Trespassing	Entrance to well site
Hard Hat/Safety Glasses/Steel Toe Shoe	Entrance to well site & other prominent locations
Muster Area	Near muster area location

Permits

During drilling operations, TIOGA shall post and display in a prominent place all permits (drilling and special) so as to be clearly visible and legible at all times.

Accident Prevention & Safety Equipment

Blow Out Prevention

In areas where the subsurface formations and pressures have been reasonably well established by prior drilling experience, the use of blowout equipment shall be in accordance with the established local practice. In areas where the subsurface formations and pressures are unknown or uncertain, all rotary drilled wells shall be equipped with blowout equipment maintained in good working condition at all times as follows:

- Master gate valve or its equivalent;
- Blowout preventer; and
- Flowline equipped with a shutoff valve of adequate size and working pressure.

The subject well will be drilled in accordance with NYSDEC Division of Mineral Resources' "***Wildcat Supplementary Permit Conditions***".

Rig Fire Protection

The drilling rig shall have readily accessible, in good operating condition, a minimum of, four (4) 20-pound capacity fire extinguishers with a Class BC rating.

The well service rig shall have readily accessible, in good operating condition, a minimum of, two (2) 20-pound capacity fire extinguishers with a Class BC rating.

Portable fire extinguishers shall be tagged with a durable tag showing the date of the last inspection, maintenance, or recharge.

Fire Protection & Suppression during Fracturing Operations

Fire protection & suppression equipment available on-site during fracturing operations shall depend on the number of well service fluid tanks utilized during said fracturing operations.

Number of Well Service Fluids Tanks		
One (1) Tank	**Two (2) – Four (4) Tanks**	**Five (5) or more propane storage tanks or when pumping energized fluids and using two (2) or more tanks**
Continuous Foam System, and 100-bbl water truck, ○ 125 US gallons of chemical concentrate (suitable for on-site fluids) ○ 500 US gpm centrifugal certified fire pump ○ 1,500-lb Purple-K Dry chemical system ○ On-board water supply of 800 US gallons ○ Minimum of. three (3) fire fighting personnel	Continuous Foam System, and 100-bbl water truck, ○ 125 US gallons of chemical concentrate (suitable for on-site fluids) ○ 500 US gpm centrifugal certified fire pump ○ 1,500-lb Purple-K Dry chemical system ○ On-board water supply of 800 US gallons ○ Minimum of. three (3) fire fighting personnel	Continuous Foam System, and 312-bbl water truck, ○ 125 US gallons of chemical concentrate (suitable for on-site fluids) ○ 500 US gpm centrifugal certified fire pump ○ 1,500-lb Purple-K Dry chemical system ○ On-board water supply of 800 US gallons ○ Minimum of. three (3) fire fighting personnel **AND** Continuous Foam System, and 100-bbl water truck, ○ 125 US gallons of chemical concentrate (suitable for on-site fluids) ○ 500 US gpm centrifugal certified fire pump ○ 1,500-lb Purple-K Dry chemical system ○ On-board water supply of 800 US gallons ○ Minimum of. Two (2) fire fighting personnel

First Aid Kit

First aid kits shall be maintained at the worksite. These kits should contain appropriate materials for the potential injuries, and should be inspected at frequent intervals, replenished as necessary, and be immediately available at all times.

First aid kits shall conform to Red Cross and other applicable good health standards, and shall consist of a weatherproof container with individually sealed packages for each type of item. First aid kits will be fully equipped before being sent out on each job and will be checked weekly by the Safety/Environmental Specialist to ensure that any expended items are replaced.

Eye Wash Station & Shower Unit

Eye Wash Stations and Shower Units shall be available on-site during fracturing operations, according to the following specifications:

- Shower Unit (Conforms to ASNI Standard Z358.1, Sections 4, 5 & 6)
- On-board water supplies are typically 500-600 US gallons ($1.9m^3$-$2.3m^3$). Each person that could be exposed to hazardous fluids requires 300 US gallons ($1.15m^3$) of potable water available for safety shower use.
- Eye wash station capable of flushing fluid to the eyes at a rate of not less than 0.4 US gallons per minute (gpm) for 15 minutes (conforms to ANSI Standard Z358.1, Sections 4, 5 & 8).
- Drench hose capable of delivering 3.0 US gpm of flushing fluid for a minimum of 15 minutes (conforms to ANSI Standard Z358.1, Sections 4, 5 & 8).

Lighting

When adequate illumination cannot be made available by other means, safe portable lights shall be provided at the well site. Light fixtures shall be placed and maintained to provide illumination for work areas in conformance with ANSI/IES RP7 1988: *Industrial Lighting*. Where possible, floodlights in use shall be placed in positions so as not to impair visions of persons in the work area.

Rig lighting and fixtures shall be of appropriate electrical classification for the area in which they are located. Rig lighting equipment in the derrick or mast, tanks, and on the rig floor, not specifically addressed in API RP 500 or API RP 505 shall be enclosed and gasketed.

Auxiliary Rig Escape

On all land rigs, the derrick or mast shall have an auxiliary means of escape installed prior to personnel working in the derrick. The auxiliary escape route should use a specially rigged and securely anchored escape line attached to the derrick or mast so as to provide a ready and convenient means of escape from the derrickman's working platform. The escape line route should be kept clear of obstructions.

Material Safety Data Sheets (MSDS) and Safety Data Sheets (SDS)

Personnel handling drilling fluid and additives should be instructed in the proper handling and disposal methods and personnel protection procedures. Guidance for proper handling and disposal of these materials is available from several sources, including the manufacturer's Material Safety Data Sheets (MSDS), now Safety Data Sheets (SDS) and appropriate regulatory agencies.

Refer to the Appendix of the SPCC Plan for the Snyder E1/1A well for copies of MSDS/SDS for all hazardous substances listed in Table 1, Material and Waste Inventory, of the SPCC Plan. Copies of the said MSDS/SDS will also be maintained on-site throughout drilling and completion, including fracturing & flowback operations.

Emergency Spill Equipment

TIOGA shall maintain equipment to aid in the prevention of, and response to, spills of petroleum and other hazardous materials. This emergency spill response equipment includes, but is not limited to, shovels, oil absorbent booms, pillows, socks and/or mats, and chemical absorbent pulp, pillows, socks and/or mats.

Refer to the Snyder E1/1A SPCC Plan for a complete description of the emergency spill response equipment available at the well site.

APPENDIX F - EMERGENCY RESPONSE TRAINING

EMERGENCY RESPONSE TRAINING

Emergency response training exercises are a key part of TIOGA's emergency response preparedness. Response personnel receive regular training—both classroom and field demonstration. Exercise participation by all emergency response staff is critical to maintaining response readiness.

Training Scope

Personnel and Contractor training includes, but is not limited to, the following elements:

- Drilling & completion practices and procedures (including emergency response)
- Safety procedures
- Selection and use of personnel protective equipment
- Material hazards and risk assessment techniques
- Basic first aid skills
- Initiating notifications
- ICS organization during an emergency
- Media communications
- Use of blowout preventer system

Training Exercises

Fire/Evacuation drills shall be conducted at least annually, and should be conducted in coordination with local police and fire departments, and the local emergency planning committee (LEPC). Additional drills shall be conducted if physical properties of the business change, processes change, or as otherwise deemed necessary.

Other training exercises include, but are not limited to,

- Table tops,
- Dry land exercises,
- Surprise exercises,
- Cooperative exercises with external (non‑TIOGA) responders, and/or
- Evacuation/Shelter-In-Place drills.

Pre-Job Safety Meetings

All contractors who may perform work at the facility are required to attend a pre-job safety meeting. This meeting covers the following:

- Basic Safety Procedures
- Emergency Alarms
- Escape Routes
- Personal & Protective Equipment Requirements
- Designated Smoking Areas
- Inventory of Hazardous Chemicals
- Reporting of Accidents/Unsafe Conditions
- Pollution Prevention
- Permitting System
- Visitors' Log
- Any Special Considerations
- Use of BOP controls, including remote control stations

APPENDIX G - WILDCAT SUPPLEMENTARY PERMIT CONDITIONS

Wildcat Supplementary Permit Conditions

1. The operator must provide the drilling company with a well prognosis indicating anticipated formation top depths with appropriate warning comments prior to spud. The prognosis must be reviewed by all crew members and posted in a prominent location in the doghouse. The operator must revise the prognosis and inform the drilling company in a timely manner if drilling reveals significant variation between the anticipated and actual geology and/or formation pressures.

2. The county emergency management office must be notified of the well's location and the potential hazards involved as follows: a) prior to spudding the well, b) prior to penetrating a target formation, c) during any flaring while drilling and d) prior to flaring for well clean-up, treatment or testing.

3. A representative of this office must be notified six (6) hours prior to penetrating the target formation. The operator or operator's designated representative, must be on site when drilling operations place the drill bit 100' (True Vertical Depth) from the target formation and throughout the drilling of the target formation.

4. Blowout prevention equipment, either pipe and blind rams or a spherical annular type with a pressure rating of (to be determined by DEC based on site-specific conditions) psig must be installed on the wellhead. All control lines must be high pressure steel with flanged connections. The BOP must be actuated by a source other than rig hydraulics.

5. The BOP, choke manifold and surface casing must be tested to a minimum of 1000 psi prior to drilling out the surface casing shoe, unless the Department grants a waiver in response to a written request from the operator which demonstrates to the Department's satisfaction that: a) the well is proposed as a deep wildcat that will be drilled through an established, shallow, low pressure pool and b) the well will have an intermediate casing string that is the first string intended for well control purposes. When intermediate casing is used, the BOP, choke manifold and intermediate casing must be tested to at least the maximum anticipated shut-in surface pressure plus a 5% safety factor prior to drilling out the intermediate casing shoe. A representative of this office must be notified six (6) hours prior to each test and a department representative may be present during the test. If the Department representative is not on location at the agreed time, the test may proceed with the results of the test and the name of the witness being noted in the driller's log.

6. A flanged choke manifold must be installed no closer than 25 feet from the wellhead. No elbows or T's, either at the wellhead or before the choke are allowed. The connecting line must be rigid steel and be welded from the flange spool to the choke line and must have the same, or higher, pressure rating as the BOP.

7. When drilling on air or drilling intentionally underbalanced on fluid, the flow line must be constructed of T & C or flanged connection tubular materials. The flow line must have a working pressure of at least 1500 psi and be connected to the spool with a flanged connection. The use of dresser sleeves is prohibited. The flow line cannot contain any elbows.

WILDCAT SUPPLEMENTARY PERMIT CONDITIONS

8. All pipes and lines which are associated with well control and which are downstream of the casing head spool must be securely chained to anchors.

9. Appropriate amounts of water and drilling mud additives to make up, weight and condition drilling fluid, and to combat loss of circulation must be on site to aid in well control.

10. There must be at least two working mud pumps (primary & backup) on site while drilling below surface casing.

11. Penetration of the target formation must occur during daylight hours when drilling on air or drilling intentionally underbalanced on fluid.

12. Individual crew member's responsibilities for blowout control must be posted in the doghouse and each crew member must be made aware of such responsibilities prior to spud.

13. Appropriate pressure control procedures and equipment must be employed while tripping, logging and running casing into the well.

14. In the event H2S is encountered, all regulated activities must be conducted by the operator in conformance with American Petroleum Institute Publication API RP49, "Recommended Practices For Safe Drilling of Wells Containing Hydrogen Sulfide."

15. Any deviation from the above conditions must be approved by the Department prior to spud.