

# Incident Investigation and Reporting

---

## 1.0 Purpose/Scope

This Practice describes the minimum internal COMPANY reporting requirements for HSSE. Guidelines for investigating, tracking and sharing the lessons learned from these incidents are also described. This Practice defines requirements beyond any external reporting required by Federal, State or local law or regulations

## 2.0 Definitions

**Action Level** – An unprotected exposure at one-half of the occupational exposure limit (OSHA Permissible Exposure Limit) for specific chemical, biological or physical agents

**Atmospheric chemical releases:** Any unplanned or accidental release from primary containment of any pure chemical, chemical mixture or compound in a gaseous state for which an MSDS is required or for which an agency reporting requirement exists.

**Comprehensive Environmental Response Comprehensive and Liability Act (CERCLA) or Superfund Amendment and Reauthorization Act (SARA) Reportable Release:** A substance release from primary containment in a volume that exceeds Reportable Quantity (RQ) as defined by CERCLA or SARA, including gaseous, liquid or solid substances. Not all Chemical releases that exceed RQ are CERCLA or SARA Reportable.

**Non-CERCLA or Non-SARA Reportable Release:** Any substance release from primary containment in a volume that exceeds a regulatory Reportable Quantity (RQ), including gaseous, liquid or solid substances. If a release has been reported under the definition “CERCLA or SARA Reportable Release” it is not subject to this definition.

**DOT Incident:** An incident on a DOT pipeline or facility that is reportable pursuant to DOT reporting requirements. Under the DOT requirements, “incident” means an event that involves a release of gas from a pipeline and a death, or personal injury necessitating in patient hospitalization; or estimated property damage, including cost of gas lost, of the operator, or others, or both, of \$50,000 or more; or an event that is significant, in the judgment of the operator, even though it did not meet these requirements. (DOT 49CFR 191.3 and 191.5)

**Failure of an engineered system:** Any failure of mechanical, electrical, structural, process or lifting systems where actual/potential for harm to people or the environment exists.

**Fatality (workforce):** Any fatality that the answer to **all** of the three questions below are yes. If any of the answers below are no, the fatality is classified as ‘**non-workforce**’. For either classification, reporting requirements exists, which are summarized in the attached **Initial Internal Incident Notification and Reporting Table**.

1. Was the incident associated with COMPANY activity? COMPANY activities are any operation or other activities that are by, for or on the behalf of COMPANY or one of its associated companies (including joint ventures).
2. Was the deceased a member of the COMPANY workforce? Every direct employee of COMPANY plus joint ventures where COMPANY ownership is greater than 40%, or when COMPANY either has operational control or is deemed to be the Operator and every employee of every other company that has been engaged to perform direct work on COMPANY premises directly on behalf of COMPANY, or to transport our people and/or materials.
3. Was the incident work-related? COMPANY uses the definition in the OSHA injury and illness reporting regulations.

**Fire and explosions:** Any unplanned incident involving COMPANY property, equipment or operations that results in a combustion resulting in a fire or explosion.

**First Aid:** A treatment for a work related injury or illness that does not ordinarily require medical care, regardless of who provides treatment. OSHA considers only the following types of treatments as first aid cases (any other type of

treatment is to be considered a Recordable Incident): 1) Using a nonprescription medication at non prescription strength ; 2) tetanus shots; 3) cleaning flushing or soaking wounds on the surface of the skin; 4) Using wound coverings such as bandages, butterfly bandages and steri-strips; 5) hot/cold therapy; 6) non-rigid support; 7) temporary immobilization devices while transporting; 8) drilling of nail; 9) eye patches; 10) removing foreign bodies from eye by using only irrigation and cotton swab; 11) removing splinter from other than eye by irrigation, tweezers or other simple means; 12) finger guards; 13) massages; 14) drinking fluids for relief of heat stress.

**High Potential Incident (HIPOs)** An incident or near miss, including a security incident, where the most serious probable outcome is a Major Incident.

**Integrity Management Incident (IM):** Any uncontrolled gas release; any uncontrolled liquid release, including liquid hydrocarbons both crude and refined, produced or injected water (including salt water disposal outages), and process chemicals, greater than or equal to 1 barrel in volume; and any failure of an engineered system. (See Uncontrolled Release definition below)

**Major Incident (MIA):** An incident, including a security incident, involving any one of the following:

- A fatality associated with COMPANY operations; or third party fatality as defined below.
- Multiple serious injuries
- Significant adverse reaction from authorities, media, NGO's, or general public.
- Cost of accidental damage or security event > \$500,000
- Oil spill from primary containment > 100 bbls, or less if at a sensitive location
- Release of more than 10 tons of a classified chemical (regulated chemical or waste)

**Near Hit/Miss:** A Near Hit is an undesired event that, under slightly different circumstances, could have resulted in harm to people, damage to environment or property, or loss to process.

**No Treatment:** An injury or illness of such a minor nature that no treatment is necessary, not even first aid. Examples might be minor scratches, bumps, or bruises, visit to a physician solely for observation, diagnostic procedures.

**Notice of Violation or Enforcement Action Notice (NOV):** Any written enforcement action (e.g. compliance notice, compliance order, notice of noncompliance, citation, fine or penalty, notice of violation, etc) issued against any COMPANY operation. This may include health, safety, or environmental violations or notices, but does not include minor deficiencies such as no location signs.

**Notifiable Release** - incidents being reported that are also reportable to an external agency must have the notifiable release box checked – yes

**OSHA Data Request** – A data request from OSHA resulting from a complaint or potential/actual occupational exposure.

**Occupational Exposure** – contact with a chemical, biological or physical agent that occurs during the course of employment

**OSHA Recordable Incident (RI):** Any work related injury or illness that results in death, days away from work, restricted work, transfer to another job, medical treatment (except first aid), loss of consciousness, or significant injury or illness diagnosed by a physician or other licensed health care professional.

- **Days Away From Work Case (DAFWC):** Any work-related injury or illness where the employee could not have worked on any day after the injury or illness, irrespective of whether there was scheduled work, or when a physician or other licensed health care professional recommends that the worker stay at home but the employee comes to work anyway. Each full calendar day is counted, not including the day of injury, even if the employee was not scheduled to work that day (including weekends and holidays).
- **Restricted Work:** Any work-related injury or illness as a result of which (1) you keep the employee from performing one or more of the routine functions of his or her job, or from working the full workday that he or

she would otherwise have been scheduled to work; or (2) a physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of his or her job, or not work the full workday that he or she would otherwise have been scheduled to work.

- **Medical Treatment:** Treatment for a work-related injury or illness beyond first aid, regardless of who provides treatment. Medical treatment does not include first aid treatment even though provided by a physician or registered professional personnel, observation, counseling, or diagnostic procedures.
- **Occupational Illness:** Any abnormal condition or disorder, other than one resulting from an occupational injury, caused by exposure to environmental factors associated with employment. It includes acute and chronic illnesses or diseases, which may be caused by inhalation, absorption, ingestion or direct contact.

**Process Safety Management (PSM) Incident:** An event, or series of events, that results in, or could have reasonably resulted in, a catastrophic release of the process fluid from the equipment within a PSM-covered process.

**Security Incident:** An incident involving terrorist activity, or theft of company, personal, or Business Partner (contractor) property or information, burglary, robbery, assault, arson, information loss, threats, alcohol or drugs, firearms, fraud, or other violation of company policy that warrants notification of Management Team.

**Serious Occurrence Report (SOR):** Any near hit or potential hazard incident that does not become classified as a MIA or HIPO, but based upon the professional judgment of line or HSSE personnel, is worth sharing across the BU. Any hydrocarbon spill of 10 bbl or greater unrecovered volume outside of secondary containment that is not reported as an MIA. Any Produced Water spill of 50 bbls or greater unrecovered volume outside of secondary containment. Finally, where the persons involved decide that there is some lesson, information, or uniqueness about a spill that should be shared across the BU and might prevent future spills.

**Spills:** The unplanned or accidental loss of primary containment from any operation owned or operated by COMPANY or managed by a contractor on behalf of COMPANY, irrespective of any secondary containment or recovery. Any loss of primary containment of a material release that *reaches ground and/or water is a spill* and shall be reported.

- **Oil, Condensate, Produced Water Spill:** An oil, condensate, or produced water spill is defined as a release from primary containment of any form of oil, condensate, or produced water. Oil is defined as crude oil, lubricating oils, hydraulic oil, gasoline and diesel fuels, aviation fuel, kerosene, and any other products refined from crude oil. Synthetic lube oils are included.
- **Chemical Spill:** A chemical spill is defined as a release from primary containment of any pure chemical, chemical mixture or compound (excluding gaseous releases to the atmosphere) for which an MSDS is required or for which an agency-reporting requirement exists.

**Transportation/Maritime Incident:** Any incident involving air transportation, and/or water/sea based vessels where COMPANY workforce or COMPANY property / equipment are involved.

**Uncontrolled Release** – An uncontrolled event where hydrocarbons or chemicals are released in any form (e.g. gas, liquid or solid) from primary containment and which results in the need for immediate corrective action (e.g. shutdown, evacuation or isolation) to mitigate the effects of loss of containment.

**Vehicle Incidents:** Any unplanned incident involving:

- **All Motor Vehicles** – includes heavy vehicles (3.5 tonnes and heavier), light vehicles (under 3.5 tonnes), self-propelled mobile plant. This includes accidents when using a hire/rental vehicle on company business, or when using a private vehicle on company business for which a member of the workforce is reimbursed.
  - **Serious Vehicle Accident (SVA)** – A vehicle accident involving one of the following will be classified as a SVA:
    - > \$10,000 damage, or
    - Involving a recordable injury, or
    - Vehicle rollover, or

- Resulting in a COMPANY work force or third party vehicle that cannot be driven from the scene
- **Workforce** – all employees and contractor personnel (including sub-contractors).
- **Work Related Kilometers** – the number of kilometers driven during work related activities (excludes kilometers driven between a driver's normal place of work and home). This includes all work related kilometers driven in hire/rental vehicles, or private vehicles (see all motor vehicles definition above).
- **Motor Vehicle Accident** – an accident involving a motor vehicle resulting in injury, or loss/damage, or harm to the environment, whether this impacts COMPANY and/or its contractors directly, or impacts a third party. This is irrespective of whether the accident was preventable or non preventable.
  - It excludes all accidents where:
    - The COMPANY workforce vehicle was legally parked
    - The journey is to or from the driver's normal place of work
    - Minor wear and tear is the case (e.g. stone damage to a windscreen, minor paintwork damage)
    - An incident is the result of vandalism, or theft
    - A company provided vehicle is being driven on non work related activities (e.g. private business, leisure)

### 3.0 General Requirements – Reporting and Distribution

#### Distribution:

- Distribution of HIPO and MIA announcements and Lessons Learned is via e-mail to:
- Distribution of outside HiPo and MIA Announcements and Lessons Learned is distributed internally by HSE Director if applicable via e-mail to

### 4.0 Key Responsibilities

#### 3.1 All COMPANY employees and contractors`

- Responsible for reporting all HSSE incidents and if assigned the responsibility, ensuring appropriate data input in Tracking System per Tracking System Guidelines, including incident classification/data changes.
- Responsible to actively participate in the investigation as requested.

#### 3.2 HSE Team Leaders

- Responsible for reviewing lessons learned and announcement draft reports.
- Responsible for ensuring announcements and lessons learned from incidents occurring are communicated.

#### 3.3 HSE Director

- Responsible for ensuring announcements and lessons learned from incidents occurring outside the regional company are shared as appropriate.

#### 3.4 Operational Department Heads and Supervisors

- Responsible for ensuring data entered into the tracking system are timely and accurate with assistance from HSE staff.

- Responsible for ensuring that actions resulting from investigations to prevent future occurrences are followed to completion.
- Responsible for considering the application of lessons learned from other areas to their own operations.

### **3.5 HSE Techs**

- Responsible for reporting on database quality assurance/quality control.
- Responsible for ensuring that incident data are trended and analyzed.
- Responsible for tracking incidents at the regional level for the HSE scorecard and for maintaining this document.

## **4.0 Procedure/Process**

### **5.1 Incident Reporting and Tracking**

Incidents, OSHA data requested and occupational exposures above the action level will be reported to the appropriate staff. Government and Public Affairs and/or Legal may be notified at managements' discretion at this initial notification stage

Initial Tracking System reports must be input and approved for all incidents within 48 hours (excluding weekends and holidays). Corrective actions entered into Tracking System must be followed through to closure. All Hydrocarbon spills greater than or equal to 1bbl, produced water spills and chemical spills greater than or equal to the reportable quantity (RQ), atmospheric chemical releases, and vehicle incidents may require additional reporting in accordance with federal, state and local requirements. Changes to incident classification must be reported to HSE TL and HSE Techs.

### **4.2 Incident Investigation**

All MIAs, HIPOs, DAFWs, and RIs will require a Root Cause Analysis and use of the Comprehensive List of Causes (CLC) (or equivalent). Less serious incidents should be investigated with a degree of rigor appropriate to the potential for loss or injury. The appropriate Leadership Teams will decide whether a root cause investigation will be performed for those less serious incidents.

When a lessons learned is required it shall be completed within 60 days of the incident.

PSM Incidents involve different investigation requirements (e.g. investigations to start within 48 hours). Refer to the COMPANY PSM Implementation Plan at the facility where the incident occurred for those investigation requirements).

The investigation team makeup will be determined based on the severity of the incident. (In the event of a fatal incident, the COMPANY Group Protocol for Investigating Fatal Accidents will be implemented.):

MIA – Team members from outside the BU/Assets as approved by BUL

HIPO/DAFW – team determined by PUL/ Asset Manager

SOR and RI – team determined by Asset Manager/Wells Team Leader

Roles for Investigating leader and team are defined in the Root Cause Analysis training.

Prior to completing a HiPo or MIA investigation a close out incident teleconference will be held with the appropriate Business Leader and additional participants as appropriate, including the HSSE professional, Contractor, etc.

An incident teleconference (among the appropriate leadership) will be conducted once the investigation team has completed the investigation and recorded all findings and actions in Tracking System for the following types of incidents:

- SORs
- Gas Releases determined to be an immediate HSSE hazard to workers or the general public, or results in an explosion or an evacuation
- Vehicle Accidents involving disciplinary action or harm to the public,
- Events requiring a Performance Leader decision to take advantage of voluntary self-disclosure.

The purpose is to demonstrate interest and concern, provide awareness of significant incidents, to have a conversation regarding the root cause stopping point, to provide feedback regarding the rigor of the investigation, and the opportunity to inquire if the investigating team has any quick learning that should be shared immediately.

**5.0 Key Documents/Tools/References**

- Occupational Safety and Health Administration, Department of Labor, 29 CFR Part 1904.8
- 49 CFR 390, “Federal Motor Carrier Safety Regulations”
- 49 CFR 191.3 and 191.5 “Transportation of Natural and Other Gas by Pipeline”
- 29 CFR 1910.119 “Process Safety Management of Highly Hazardous Chemicals”

**Revision Log**

Revision Date	Authority	Custodian	Revision Details
			Final/Issued