

Beckman Production Services, Inc.

ACCIDENT PREVENTION PROGRAM

BECKMAN PRODUCTION SERVICES, INC.

ACCIDENT PREVENTION PROGRAM

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HEALTH, SAFETY & ENVIRONMENTAL POLICY STATEMENT

Beckman Production Services (J&R Well Service LLC.; R&S Well Service, Inc.; SJL Well Service, and Northern Production Services LLC.) are committed to providing a safe and healthy environment for our employees, contractors and visitors. We are also committed to managing our operations in an environmentally sensitive and responsible manner. We recognize that it is our obligation to demonstrate safety and environmental leadership by maintaining the highest standards and serving as an example to our employees and the community.

Beckman Production Services will strive to continuously improve our health, safety and environmental performance by adhering to the following objectives:

- Continue to develop and improve procedures and programs to ensure compliance with applicable laws and regulations.
- Ensure that all personnel are trained and provided with appropriate equipment.
- Ensure that all employees have the authority to “Stop the Job” or procedure they believe may cause injury or death, or which may endanger other personnel on location, or citizens in the immediate area.
- Take immediate action to correct hazards or conditions that endanger health, safety or the environment.
- Encourage personal accountability and compliance with Beckman Production Services policies and procedures.
- Communicate our desire to continuously improve our performance and our expectation that every employee, contractor and visitor will follow Beckman Production Services policies and procedures and report any health, safety or environmental concern to Beckman Production Services management.
- Consider safety and environmental factors in all operating decisions, including planning and acquisitions.
- Engage in sound reuse and recycling practices and continue to explore opportunities to minimize the amount of waste generated.
- Prevent pollution through training and proper management of waste.
- Monitor our progress through periodic evaluations.

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SAFETY POLICY STATEMENT

To ensure that all Beckman employees have a safe environment in which to work, it is the Corporation's commitment to develop and maintain an effective safety program. Humane considerations require the conditions which induce accidents to be kept to an absolute minimum. Economic considerations demand that the accident prevention effort be successful.

An accident prevention program is only as effective as management wishes to make it. Beckman acknowledges this responsibility, and directs its supervisory personnel to the leadership role in all aspects of accident prevention. This commitment requires every manager, supervisor, and employee to be responsible for carrying out their job in a safe manner, as well as for reporting and, where qualified, for correcting hazardous conditions and unsafe procedures which may cause injury to a fellow employee, or damage to company or personal property.

To ensure that an effective Accident Prevention Program will be maintained in Beckman, a formal structure exists for the purpose of assignment of responsibility and accountability. The Corporate Safety Director is responsible to the Division Manager for the maintenance of the Accident Prevention Program in accordance with Beckman's philosophy and policy.

The Corporate Safety Director will administer, through operational management, a training, inspection, and investigation schedule which implements the full intent of the Accident Prevention Program. Liaison with the appropriate insurance correspondent will be the responsibility of the Safety Director.

The basic responsibility for the administration of the Accident Prevention Program rests with each supervisor. Adherence to this policy, operations procedures and work rules, are considered a part of this responsibility. In addition, each supervisor has responsibilities identified with inspection, reporting and training.

Beckman recognizes that safety is essential to the successful operation of its business. Since every accident represents an unnecessary loss to the individual employee involved, and to the Corporation, it is our objective to eliminate, wherever possible, those conditions which lead to accidents. We respect the right of our employees to work in an accident-free environment and, therefore, require total compliance with all safety procedures to protect those rights.

This program will remain in effect until superseded in writing.

Danny J. Cagle, President & COO
BECKMAN PRODUCTION SERVICES, INC.
Date: 1/27/2014

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ACCIDENT PREVENTION PHILOSOPHY

DIVISION MANAGER RESPONSIBILITY

1. The Division Manager shall have the final responsibility for accident prevention and safety within Beckman. This includes the communication of objectives, assigned responsibilities, authority, and fixed accountability in carrying out the intent of the Accident Prevention Program.
2. The Division Manager shall have the final responsibility for the implementation, quality and maintenance of the Beckman Accident Prevention Program.
3. There shall be a Beckman Safety Committee appointed by the Division Manager for the purpose of reviewing all lost time accidents, inspection reports and recommendations submitted by the Safety Director. Membership and agenda of the Safety Committee will be at the discretion of the Division Manager. The Rig Operators safety group and the Truck "Take 2 for Safety" group.
4. The Division Manager shall be responsible for the initiation of the follow-up action for deficiencies noted during the inspections by the safety staff.
5. The Division Manager shall approve and evaluate all safety incentive programs in an effort to determine their value.
6. The Division Manager shall be responsible for the preparation and submission of the various accident and safety reports.
7. It will be the duty of the Corporate Safety Director to make a quarterly report to identify the losses associated with work accidents. Such report will detail lost time Worker's Compensation claims and vehicle/equipment accident damage.
8. The Safety Director or his/her designee shall maintain a general knowledge of federal and state safety-oriented legislation and regulations pertinent to the operation of Beckman.
9. Beckman shall include a factor for safety accomplishment in its management and supervisory personnel performance evaluation.
10. Shall, by example and attitude, reflect the importance of safety in Beckman operations.

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SAFETY DIRECTOR'S ROLE & RESPONSIBILITY

The Division Manager shall assign a Corporate Safety Director with responsibilities for the Accident Prevention Program in the respective divisions.

The Safety Director shall occupy a staff position with reporting responsibility to the Division Manager of Beckman.

The duties and responsibilities of the Safety Director shall be as follows, however, shall not be limited to those specified:

Duties and Responsibilities

1. Responsibility for implementing a total Accident Prevention Plan, which includes the necessary procedures and practices to create a safe work environment.
2. Submit to the Division Manager an outline of goals and objectives which will provide for the implementation of the Accident Prevention Program at all levels of management and supervision within Beckman.
3. Prepare a schedule of training which implements the provisions of the Accident Prevention Program for new and experienced employees. The appropriate training materials will be developed to initiate this responsibility through the managers and the supervisors.
4. Administer specialized training in First Aid, CPR, Blood borne Pathogens, CSE, LOTO, Machine Guarding, H2S protection, Equipment emergencies, Hazcom (Right to Know) Written Hazard Communications Program, along with other programs required for the this industry..
5. Establish a schedule of rig, vehicle, equipment and facility inspections which will insure compliance with the Accident Prevention Program and the Written Hazard Communications Program. Reports of this activity will be reviewed with the proper management and supervision, and deficiencies will be noted and receive follow-up.
6. Recommend safety standards for hazard recognition and elimination, which are consistent with state and federal laws, rules and procedures.
7. Be responsible for the preparation of accident reports and the supervision of the necessary follow-up.
8. Submit to the Division Manager a monthly report of activity and an evaluation of those accidents taking place during the month.
9. Assist Area Manager and administer a Beckman safety incentive program, as directed by the Division Manager.

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10. Evaluate various items of equipment in an effort to recommend that which has the best safety value.
11. Prepare an annual budget relating to the operation of the Accident Prevention Program and shall report on the cost benefit.
12. Determine during field visits that employees have received the necessary training related to the Accident Prevention Program, Right to Know Communications Program and Beckman policies and procedures.
13. Maintain an awareness of the various types of insurance policies which apply to Beckman's coverage.
14. Provide the necessary resources in support of the Beckman Safety Committee.
15. Determine that outside, third-party contractors doing business with the Beckman have valid insurance with adequate limits of coverage.
16. Maintain a MSDS master file record for each division and coordinate and maintain Right to Know associated training records for the corporation.
17. Make monthly activity reports which communicate the status of the Accident Prevention Program within Beckman.
18. Maintain liaison with company safety officials representing organizations which Beckman has a business relationship.
19. Have current knowledge of Department of Labor, OSHA, MIOSHA, DEQ, Pennsylvania, Oklahoma and WYOSHA laws and regulations which apply to Beckman operations in Michigan, Pennsylvania, Oklahoma and Wyoming. Liaison with the enforcing agency personnel shall be maintained.
20. The Safety Director has the authority to stop or alter any situation or procedure he believes may result in the injury or death of any employee, or which may endanger other personnel on location, or citizens in the immediate area. Such action will be reported as soon as practical to the Division Manager and to Dart's Corporate Safety Manager.
21. Lead by example and attitude; reflect the importance of safety in Beckman operations.

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AREA MANAGER'S (Superintendent) RESPONSIBILITY

The Area Manager is responsible for the carrying out of the intent of the Accident Prevention Program in the various yard locations and in field operations.

These duties and responsibilities include, but are not limited to the following:

1. A determination that all equipment, rigs, vehicles and facilities are being operated in an approved manner, consistent with this manual and applicable Federal, State and local laws, regulations and ordinances.
2. The appropriate direction and counsel of supervisor, rig and truck and other subordinates concerning safe practices and procedures.
3. A determination that new employee safety orientation and scheduled follow-up safety training for all employees is scheduled and conducted in an acceptable manner.
4. Determine that all safety rules, Hazcom requirements and procedures are being followed.
5. Insure that the necessary resources are in place to respond to medical emergencies on location.
6. Insure that prompt reporting and proper investigation of all accidents and major Near Misses involving employees under his/her direction takes place in accordance with established policy.
7. Be an example and have the attitude toward safety, set the standard when present at work locations.
8. Review rig inspections and spot check vehicle inspections to determine that the identified corrections are followed up as soon as possible in accordance with the priority of hazard.
9. Make recommendations to the Beckman Division Manager regarding changes in operations, equipment and personnel which will improve safety conditions.
10. Planning and conducting periodic meetings with supervisory staff to review accident experience, including lost time accidents and the quality of the safety effort as exhibited by equipment, vehicle and rig inspection reports.
11. Evaluate rig pushers, truck pushers, operators and other supervisors annually for their performance; including the number of accidents that might have been prevented, implementation of the Accident Prevention Program by the individual, quality of safety training provided employees, example set by the individual as judged by their safety attitude and the compliance with safety rules by those supervised, the quality of inspections including repeated deficiencies.

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12. Remain current on State laws and Federal government regulations which affect rig and trucking operations.
13. Report all spills of environmental nature which involve Beckman equipment or personnel to the appropriate governmental agencies and to the Division Manager. Determine that the approved procedures are followed to contain control of the spill.
14. Scheduling and participation in effective safety training sessions for employees under his direction as required by the Beckman Safety Director and the Division Manager.
15. Follow-up corrective measures, as needed, resulting from the inspections of the Safety Director and/or other Executive Management's directives.
16. A review of vehicle speed record graphs to determine that legal speeds are being driven.
17. Determine that the equipment brought from another yard, leased or rented equipment is in safe operating condition and meets MIOSHA/OSHA, Pennsylvania, Oklahoma or Wyoming requirements.
18. By example and attitude, reflect the importance of safety in Beckman operations.

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RIG/TRUCK SUPERVISOR'S RESPONSIBILITY

As a representative of management, the rig or truck supervisor is responsible for compliance with the Accident Prevention Program on equipment assigned to him/her for supervision, this includes Beckman personnel under his/her direction, as well as Beckman personnel working on location in support of such equipment.

The responsibilities of the supervisor include, but are not limited to:

1. Accountability for equipment operation in compliance with Beckman safety rules, MIOSHA/OSHA, Pennsylvania, Oklahoma and Wyoming OSHA requirements and Federal and State laws governing commercial vehicle operations.
2. Observance of division employment policy and federal/state regulations governing employment.
3. Employee compliance with division work rules and safety standards, policies & procedures.
4. Scheduling and participation in effective safety training sessions for employees under his direction as required by the Corporate Safety Director and the Division Manager.
5. Follow-up corrective measures, as necessary, following the Safety Director's or designee's inspections, MIOSHA/OSHA inspection or other management directive of those vehicles and equipment under his direction.
6. The prompt reporting and thorough investigation of all vehicle and employee accidents, near-miss accidents, and procedure violations involving division vehicles.
7. The execution of a regularly scheduled maintenance program for all vehicles and equipment under his direction, with monthly inspections.
8. The maintenance of emergency procedures that will insure that employees under his direction receive prompt medical assistance, as needed.
9. Knowledge that all drivers of corporate vehicles coming under his direction are properly licensed to drive the vehicles assigned to them.
10. Periodic inspection of all vehicles assigned to his direction to determine that all equipment meets the requirements of Motor Carrier Regulations.
11. Responsibility for the review and filing of speed charts produced by tachographs installed in ten thousand pound vehicles and above.
12. Shall, by example and attitude, reflect the importance of safety in division operations.

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13. Shall determine that all employees have a working knowledge of the Beckman Safety Policy and Rules and have the proper training for the job at hand.
14. Liaison with the various Operators to determine that their requirements are consistent with Beckman policy and the Accident Prevention Program.
15. Knowledge of the State Motor Carrier laws and regulations and operating requirements associated the MPSC permits.
16. Shall, by example and attitude, reflect the importance of safety in Beckman's operations.
17. Administer and maintain written evaluations according to Beckman's SSE/Green Hard Hat Policy.

Rig Only

1. Daily visits to rigs under his/her direction, unless an emergency requires his/her presence elsewhere. Documentations of safety discussions submitted weekly to the Safety Director.
2. Assist, counsel and supervise rig operators by discussing inspections, accidents, employee safety habits, selection and training of new personnel, scheduling of safety meetings, rig appearance and maintenance.
3. Shall periodically examine the inventory of hazardous designated substances on each rig to determine that the yard inventory listing is complete and that the appropriate MSDS information is on file and the proper labeling is in place.

Truck Only

1. Shall periodically check ride with a driver who has experienced an "at fault" accident, received several traffic violation or whose vehicle has a high maintenance record.
2. Determine that all vehicles are properly licensed and that all certificates, required paperwork, permits and decals are in and/or on the appropriate vehicles.
3. Review of hours work by the drivers and the associated paperwork.
4. Conduct morning documented safety meetings with drivers.

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RIG OPERATOR'S RESPONSIBILITY

As the supervisor of the rig, the Rig Operator is responsible for compliance with the Accident Prevention Program; this includes the safety and well being of the personnel assigned to the rig.

The responsibilities of the Rig Operator include, but are not limited to:

1. Observance by himself and the crew of Beckman safety rules, contained in the Accident Prevention Program, as well as those laws, rules and regulations covering rig and oil servicing operations enforced by MIOSHA, Pa, Ok and/or Wyoming department of OSHA.
2. Supervision of rig crew activities in such a manner as to increase efficiency and reduce accident exposure.
3. Reporting faulty, worn out and damaged equipment for replacement and repair.
4. Constant review and examination of work procedures and practices in order to improve operations which reduce accident exposure.
5. Schedule and conduct daily and weekly safety meetings with the rig crew, covering recent accidents, "near miss" incidents, observed unsafe practices of the crew, review of proper work procedures, rig condition observations, Right to Know chemical uses and the relationship with Operating personnel.
6. Ensure that new employees receive assistance and guidance in learning their job tasks; provide instruction which accents the safe procedure for performing assignments.
 - a. Show the individual how to do the job safely and properly, observe the employee as he/she performs the task or have him/her tell how it should be done.
 - b. Describe the functions and limitations of the equipment he/she will be using, instruct on how the equipment is safely operated.
 - c. Enlist the participation of the other crew members to learn and assist the new member of the team.
 - d. Observe the new employee until satisfied that the tasks are being preformed safely and efficiently.
 - e. Obtain feedback from the crew as to how the new member is doing.
 - f. Compliment the new member when actions deserve.

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7. Report on the prescribed forms all accidents involving Beckman personnel and/or vehicles, "near miss" incidents, damage or injury to third parties should also be reported. Accidents involving injuries must be reported immediately and a report submitted within 24 hours.
8. Adherence to the requirements of the Corporate Hazard Communication Program (Right to Know) Hazcom program.
 - a. Orientation of all new employees.
 - b. Use of identified safety equipment as suggested in the Material Safety data sheet.
 - c. Assurance that all hazardous substances are properly labeled with legible descriptions.
 - d. Determination that all hazardous substances are used in a manner as to minimize exposure to those involved.
9. Bring to the attention of the rig supervisor or area manager those requests from Operators to do tasks that are clearly a violation of Beckman policy, the Accident Prevention Program, Federal, State or local laws, rules, regulations or ordinances, before performing the task.
10. Conducting a rig inspection following each "rig up" on a new location, and at the start of each day upon return to the rig. This is to include anchors and guy lines, locking latches and dogs on masts.
11. Conducting a formal rig inspection once each month when the rig is working on location. Discussing with rig pusher any suggested improvements.
12. Administering a rig maintenance schedule which continually services and inspects rig components. Participate in the Maintenance Management PLUS program.
13. Establish and enforce fire safety rules which eliminate smoking around the well head and inside the guylines of all rigs...
14. Shall train and drill all crew members in emergency procedures, for blowouts, BOP's, fires and personal injuries.
15. Shall, by example and attitude, reflect the importance of safety and compliance with Beckman policy.

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DRIVER'S SAFETY RESPONSIBILITIES

Driver's have the individual responsibility to determine that the vehicle they are driving has the required equipment (brakes, lights, tires, etc.) to ensure safe operation of the unit.

Inspections

1. Drivers will complete, if required, pre-trip (DVIR) and/or post-trip vehicle inspections on the vehicle that they operate.
2. Drivers will complete monthly vehicle inspections for the vehicle they operate and participate in the Maintenance PLUS program.
4. Drivers are responsible for the maintenance of their vehicle and associated equipment.
 - a. Tractor
 - b. Trailer
 - c. First-aid kit
 - d. Fire Extinguishers - (Inspect and Tag Monthly)

Accident Reporting

5. All accidents and injuries regardless of their nature must be reported to the assigned supervisor immediately and a written report submitted within twenty-four hours of the incident. Where personal injury is involved, the report will be immediate. The Corporate reporting form shall be used.
6. Incidents involving environmental considerations, such as spills, and equipment damage will be reported immediately.

INSPECTION PROGRAM FOR RIGS

The Rig Operator and Supervisor are responsible for conducting monthly rig inspections while the rigs are in operation. The inspection will include equipment inspection using an AESC (Association of Energy Service Companies) approved form for noting observations and citing items for correction. At the conclusion of the inspection, the Safety Director, or his/her designee, will review with the rig supervisor and the rig operator those items requiring attention. Periodical audit inspections will be conducted by the Corporate Safety Director or HSE Technician.

The rig inspection will include a review of all accidents involving rig personnel taking place since

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the last inspection. Costs, corrective action and training will be discussed with regard to each incident.

Similar inspections will be conducted for all Beckman facilities and operating equipment.

Self-Inspection

The rig supervisor shall have the responsibility to carry out self-inspections on a monthly basis, as well as conducting a "Rig Up" safety inspection at each new location.

Rig operators shall conduct daily visual inspections of the area and equipment for which they have responsibility.

Self-inspections are designed to keep equipment and facilities in safe and efficient working order. Conditions which do not comply with the established safety requirements, and which reduce efficiency of the operation, should be noted for correction. This includes equipment observations, as well as personnel procedures and practices, which do not comply with Beckman standards.

The most important feature of self-inspection is follow-up procedure which corrects a faulty condition. This must be carried out in a timely manner.

Vehicle Inspection

Drivers will conduct daily inspections for the vehicles which they are assigned to determine that brakes, lights, tires and steering are in the required condition. A regular maintenance inspection will also be conducted daily to determine that fluid levels are appropriate.

When trailers are connected to tractors or other types of pulling units the driver will determine that brakes, lights and tires are in the required condition. Safety chains will be inspected where necessary by law.

When drivers are assigned to a vehicle strange to them, they will inspect for the appropriate registration plate, registration certificate and certificate of insurance. Windshield condition, wipers, defroster and washer, horn and safety items (first-aid kit, reflectors, fire extinguisher, etc.) will also be checked.

External Inspections

Corporate management will schedule formal inspections on an annual basis. These inspections will be carried out in a manner similar to those conducted by the Beckman Safety Director. The inspections will note general safety conditions, accident experience, supervisory efforts and attitude, and general housekeeping observations. A report of the inspection will be made to the Corporate Safety Committee with copies to the Beckman Division Manager.

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TRAINING PROGRAM

Beckman sponsored training shall be identified in five areas of instruction: 1) Basic Rig Safety; 2) Rig and Unit Safety Meetings; 3) Vehicle-Driver Safety Training; 4) Supervisory Training; 5) Specialized Training, i.e., H2S, First-aid/CPR, Hazard Communication/GHS, Confined Space Entry/Awareness, LOTO, Personal Protective Equipment.

As recommended by the Safety Director, the Division Manager may authorize attendance at seminars, conferences and special courses which are determined appropriate to further the effectiveness of the total safety program. All training is considered MANDATORY unless excused by the Division Manager.

Basic Rig Safety Training

Basic Rig Safety Training will be provided in a two phase program. The initial phase will consist of new employee orientation and a schedule of on-the-job training, which will be given by the rig operator under the supervision of the rig supervisor.

During the orientation the new employee will receive instruction relating to the Accident Prevention Program, including Beckman safety policies and rules, what is expected of the employee, what he/she might expect from Beckman and what types of tasks he/she will be responsible to perform.

The on-the-job training will include familiarization with the following:

1. Rig Operations
 - a. Functions of derrick anchors and guy lines
 - b. Pressures and flow lines
 - c. Fire hazards and precautions
 - d. Blowout prevention
 - e. Hydrogen Sulfide Gas -- protective equipment and alarms
 - f. Protective clothing and equipment
 - g. Rigging up procedures and personnel responsibilities
 - h. Rigging down procedures and personnel responsibilities
 - i. Operation of the rod and tubing tongs
 - j. Rig maintenance responsibilities
 - k. Tool usage and storage
2. Personnel Responsibilities
 - a. Floor hands
 - b. Derrick hands

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3. Emergency Operations
 - a. Accident Reporting
 - b. Injury/First aid Response/CPR
 - c. H2S Emergency
 - d. Blowout Emergency
 - e. Fire Emergency

A learning sequence is recommended to insure that the employee is learning the assigned tasks. Initially the employee must be given demonstrations of work tasks, followed by observations, feed back and support that he/she is progressing. A procedure for correcting errors and answering questions must be established and know by the involved parties.

Review of the new employee's progress will be conducted by the area manager or the rig supervisor with the rig operator and document to the EE file.

All procedures shall be reviewed annually and any changes shall be brought to the rig supervisor's attention.

New Hire Rig Safety Orientation

A New Hire Rig Safety Orientation will be scheduled for each new employee the 1st day of employment.

Course Outline

1. "New Employee Safety Orientation, Well Servicing Division" PowerPoint
Introduces new and experienced personnel to the daily operations and what is expected and what to expect from working in the well servicing industry.
2. H2S Training
Introduces new & experienced employees to H2S in the workplace.
3. Lock Out Tag Out Training
Introduces new & experienced employees to LOTO in the workplace.
4. Hazard Communication Training
Introduces new & experienced employees to HazCom in the workplace.
5. Confined Space Awareness Training
Explains to new & experienced employees what a confined space is.

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Rig & Unit Safety Meetings

A safety meeting will be held at the beginning of each job by the supervisor or rig operator with the respective crew or employees.

Discussion topics may be supplied by the Beckman Safety Director, rig or truck supervisor or may result from recent incident taking place in the work unit. The safety meeting must be positive influence on the participants to maintain an awareness of the safe way of performing their responsibilities.

The supervisor or rig operator conducting the safety meeting will have the attending participants acknowledge their attendance on the Safety Meeting Report or the Rig JSA/Work Permit, which will be turned in to the rig pusher or other management representative for distribution to the Beckman office.

It is the responsibility of the rig or truck supervisor to obtain and submit reports on safety meetings.

Specialized Training

The Corporate Safety Director shall develop, for the Division Manager's approval, a schedule of specialized training which meets established needs. Such training will include, but not be limited to H2S training on a continual basis, first aid/CPR training necessary to meet MIOSHA, Pa, Ok, and/or WYOSHA requirements, driver safety, and B.O.P. operation training.

The full efforts of the training program will be evaluated with Beckman's accident experience.

Driver Training

1. "New Employee Safety Orientation, Trucking Operations" PowerPoint
Introduces new and experienced personnel to the daily operations and what is expected and what to expect from working in the well servicing industry.
2. All drivers of Corporate owned vehicles will attend safety meetings which include instruction on their responsibilities as drivers. These meetings will cover such considerations as vehicle speed, following too closely, lane usage, winter driving and defensive driving.
3. Drivers of vehicles with gross weight of 10,000 pounds or greater will receive instruction covering State Motor Carrier rules and regulations and defensive driving.

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4. All drivers shall attend Hazmat and Security training within the first three months of their employment.

Supervisory Training

Supervisory training will be designed to assist supervisors in understanding their responsibilities related to the Accident Prevention Program. Included in this training will be general principles of supervision and the appropriate laws and regulations pertaining to effective supervision.

Participation will include all levels of management and supervision. The frequency of this training will be determined by the Beckman Division Manager upon request of the safety director.

Instruction will be provided by the best qualified instructors readily available within the corporation and from outside sources. All training is considered MANDATORY unless excused by the Division Manager.

POLICY ON INEXPERIENCED EMPLOYEES

Short Service Employee/SSE/Green Hard Hat Program/Inexperienced Employee

All inexperienced employees will be required to wear a (**GREEN HARD HAT**) to assist in recognizing employee's lack of experience in performing work activities.

- A. Inexperienced is defined as less than one year in the job that the employee was hired to perform.
 - Single person "crew" cannot be a SSE
 - 2-4 person crews can have only 1 SSE per crew
- B. Inexperienced is also defined as an employee that has moved/shifted from one job category to another with little to no experience in performing that task.
- C. Inexperienced can also be defined as an employee working in one portion of the industry and makes a career change into a different portion of the industry.
 1. Drilling industry employee hired to work on a service rig.
 2. Water truck driver employee hired as a Floor hand on a service rig.

All inexperienced employees issued a (**GREEN HARD HAT**), will be required to wear hard hat until the employee has fulfilled company requirements.

- A. All inexperienced employees will be assigned a mentor to assist with job description developments.
 1. **Definition of a Mentor** – A mentor is an experienced employee or supervisor.
 2. A mentor's roles & responsibilities include:

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1. Assist the employee during his/her SSE period. Coaching and mentoring in correct safety culture.
 2. Provide specific HSE guidance and proper job techniques to inexperienced employee.
 3. To assure inexperienced employee doesn't perform any task in which they have not been properly trained.
- B. It is the mentor's responsibility to closely supervise the assigned inexperienced employee and prevent him/her from performing tasks for which they are not properly trained.
- C. Supervisor/operator will perform evaluation/on site observation on each inexperienced employee that is under his or her management.
- D. Supervisor/operator will conduct 1-evaluation each week for the first month, and then one evaluation each month for the next 5-months for a total of 6-months of evaluations prior to new employee being considered for different hard hat classification.
- E. Hard hat classification will be determined by the employee operational/safety performance over that six months period.
- F. Employee status change will be evaluated by immediate Supervisor/Safety Director, and endorsed by the operational manager prior to classification change.

Early Removal from SSE

An employee new to company with greater than 6 month's prior oilfield experience the mentor/supervisor should use discretion as to length of SSE time needed. Consider the following when removing an employee:

1. Job responsibilities/duties previous assignments
2. Work processes/practices from previous assignments
3. Equipment/tools from previous assignments
4. Skill level, familiarity with co-workers
5. Safety competencies
6. Safety meeting attendance and participation
7. Safety incidents/history
8. Similarity of job assignment

Any questions concerning the requirements of this program should be directed to your supervisor or the safety department.

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H2S (hydrogen Sulfide) POLICY

This policy establishes guidelines for Beckman employees whose work activities may involve exposure to hydrogen sulfide gas (H2S).

Objectives

1. Prevent any and all accidents, and prevent the uncontrolled release of H2S into the atmosphere.
2. Provide emergency procedures to cope with emergencies.
3. Provide immediate and adequate medical attention should an injury occur.
4. Establish minimum equipment standards and detection standards.
5. Establish management and supervisor responsibility.
6. Establish training requirements.

Emergency Procedures

A. Non-Blowout Conditions:

1. Under non-blowout conditions, such as leaking valves or small amounts of gas at the flow-nipple or gas buster (if in use), if the siren sounds indicating H2S concentration levels of (ten) 10 ppm, but less than (fifteen) 15 ppm, take the following steps immediately:

- a. Secure breathing equipment and determine the location and safety of all personnel.
- b. Call the H2S contractor, if not already on location.
- c. Remove non-essential personnel from danger zone and close area.
- d. Notify operator representative (company person) of the situation, if not already on location.
- e. Take steps to determine whether the H2S level can be corrected or suppressed.

B. Blowout Conditions:

2. Under blowout conditions, such as ruptured lines or loss of well control, if

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the siren sounds indicating H2S presence, take the following steps immediately:

- a. Secure breathing equipment and determine the location and safety of all personnel.
- b. Call for the H2S contractor, if not already on location.
- c. Remove non-essential personnel from danger zone and close area.
- d. Notify operator representative (company person) of the situation, if not already on location.
- e. Notify the MDEQ or your state regulatory agency of well condition (should be done by operator representative).
- f. Attempt to determine whether well can be shut-in or the H2S levels can be suppressed.
- g. If high volume, high H2S concentrated gas continues to escape from the well, demand that the company person notify the nearest law enforcement agency (State Police, County Sheriff, and Township Police) and offer cooperation and assistance to company man during emergency. **Note:** In those instances where the company person is not on location, the tool supervisor will notify the nearest law enforcement agency if advised by the H2S contractor that H2S levels are unsafe.

C. If loss of well occurs:

1. Remove all personnel to safe breathing areas.
2. Account for all personnel.
3. Determine if well should be ignited.
4. Notify public safety personnel (Sheriff Department, State Police, Fire Department and Emergency Medical System).
5. Evacuate public from the area of exposure should be left to public safety officers unless the immediate danger exists.
6. Proceed with the best plan (at the time) to regain control of the well. Maintain tight security and safety procedures.

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D. Responsibility:

1. Approved supervisor at the well site (Company Person or BPS Supervisor).
 - a. Shall be responsible for implementation of emergency procedures.
 - b. Shall be in complete command during an emergency.
 - c. Shall designate a back-up supervisor.
 - d. Shall insure all employees are trained and groomed properly to perform work in an H2S area. (See Training Requirements)
 - e. Shall insure H2S monitoring equipment arrives on location on time and functions properly.

E. Emergency Reaction Steps (When Location is alarmed):

1. All Personnel:
 - a. On Light Alarm (10 ppm) - Secure breathing equipment.
 - b. On Audio Alarm (15ppm) - Mask up.
 - c. Check status of personnel (Buddy System).
 - d. Check monitors for all stations.
 - e. Be ready to signal Safety Personnel (H2S Contractor) if help is needed.
 - f. Notify Company Person or Operator Personnel.

Equipment Requirements

1. Signs - Two signs must be posted, one located at the lease entrance and one located at the location entrance.
 - A. "Danger - Sour Gas Area" (or equivalent) with condition flags.
 - 1) Condition flags; flags displayed to denote conditions.

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- a. Green - Safe
 - b. Yellow - Potential Danger
 - c. Red - Danger - H2S Present
- 2) Condition flag shall be posted on a sign at the location entrance.
- B. "Danger - Authorized Personnel Only"
2. Breathing Equipment
- A. Air line units for all rig personnel.
 - B. Thirty minute air-packs (minimum) for all rig personnel.
 - C. Spare air bottles for packs.
 - D. 5 minute escape packs
3. Wind Sock - Wind Streamers
- A. One wind sock located at protection center (H2S equipment trailer) at a height visible from the rig floor.
 - B. Wind streamers are to be placed at various locations (handrails, guidelines, etc.) on the well site to insure wind consciousness at all times.
4. Rescue Equipment
- A. Stretcher
 - B. Two 250' (two hundred fifty feet) lengths of 3/8" nylon rope.
5. Well Ignition
- A flare gun, with flares, shall be at the rig.
6. Fire Extinguishers
- Four fire extinguishers shall be located at strategic locations.
- A. Draw works area
 - B. Doghouse
 - C. Rig Anchors

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7. Blowout Prevention Equipment

The well shall have adequate B.O.P. equipment. The equipment will be hooked up completely and will be mechanically tested daily with the test being recorded on the daily time ticket.

Training Requirements

When working in an area where hydrogen sulfide gas (H₂S) might be encountered, definite training

requirements must be carried out. All personnel at the well site will have had adequate training in the following:

1. Hazards and Characteristics of H₂S.
2. Physical Effects of H₂S on the Human Body.
3. Toxicity of H₂S and Sulfur Dioxide (SO₂).
4. H₂S Detection.
5. Personal Protection.
6. Emergency Rescue.
7. Artificial Respiration.
8. Effects of H₂S on Metals.
9. Location Safety.

Service Company and Visiting Personnel

1. Each service company that will be on the well site will be notified that the zone contains H₂S.
2. Each service company must provide for the training and equipment of their employees before they arrive at the well site. No service company or other personnel will be allowed on location without proof of H₂S training.

NOTE: Training records for Beckman employees of Michigan and Pennsylvania will be kept on file at the Kalkaska office. Wyoming and Oklahoma Divisions shall be responsible for their own record keeping but may be subject to audit from BPS Corporate Safety Department.

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Ignition Procedures

1. Responsibility

THE DECISION TO IGNITE THE WELL IS THE RESPONSIBILITY OF THE OPERATOR REPRESENTATIVE. In the event he/she is incapacitated, it becomes the responsibility of the Rig supervisor. This decision should be made only as a last resort and in a situation where it is clear that:

- A. Human life and property are endangered;
- B. There is no hope of controlling the blowout under the prevailing conditions at the well.

Notify the District Office of the Michigan Department of Environmental Quality (DNRE), if time permits, but do not delay if human life is in danger.

Initiate the first phase of the evacuation plan.

2. Instructions for Igniting the Well

- A. Two people are required for the actual igniting operation. They must wear self-contained breathing apparatus and safety ropes attached. One man will check the atmosphere for explosive gasses with the Explosimeter. The other man is responsible for igniting the well.
- B. Primary method to ignite: 25mm meterotype flare gun with a range of approximately 500 (five hundred) feet. Extreme care must be exercised in the operation of the flare

gun because of a very sensitive trigger which may cause ignition when closing the chamber after loading. The flare gun must always be pointed in a safe direction, with the hand clear of the barrel end.
- C. Ignite up-wind and do not approach any closer than is warranted.
- D. Select the ignition site best for protection.
- E. Select area for hasty retreat.
- F. Before firing, check regarding combustible gasses.
- G. **Since H₂S converts to Sulfur Dioxide, the area is not safe after igniting the well.**

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- H. After igniting, continue emergency action and procedure as before.
- I. All unassigned personnel will limit their actions only to those directed by the well site supervisor.

REMEMBER: After the well is ignited, burning Hydrogen Sulfide will convert to Sulfur Dioxide, which is also highly toxic - DO NOT ASSUME THE AREA IS SAFE AFTER THE WELL IS IGNITED.

LOCKOUT/TAGOUT POLICY AND PROCEDURE

The purpose of this procedure is to assure that employees are protected from unintended machine motion or unintended release of energy which could cause injury when they set up, adjust, repair, service, install or perform maintenance work on equipment, machinery or process. This procedure applies to all employees, performing any of the aforementioned tasks.

Management Responsibilities

1. Each supervisor will be responsible to train new employees and periodically instruct all of their employees regarding provisions and requirements of this lockout/tag out procedure.
2. Each supervisor shall effectively enforce compliance of this procedure including the recommendation for corrective disciplinary action when necessary.
3. Each supervisor shall assure that the necessary locks and tags are available to employees exposed to lockout/tag out situations.
4. Prior to setting up, adjusting, repairing, servicing, installing or performing maintenance work on equipment, machinery or processes, the attending supervisor shall determine and instruct the employees of the steps to be taken to assure they are not exposed to injury due to unintended machine motion or release of energy.

Employee Responsibility

1. All employees will comply with the lockout/tag out procedure.
2. Employees shall notify their supervisor prior to locking out/ tagging out equipment to be worked on.

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3. Employees shall consult with their supervisor whenever there are any questions regarding their protection.
4. Employees shall use and care for the locks and other devices required to comply with the lockout/tag out procedure.

Rule for Locking Out and Isolating Power Sources

1. When repairing electric powered pumps and machinery, the power source (usually the breaker box or the central control switch) must be padlocked and tagged with a "Do Not Operate Tag", to prevent energizing of the equipment.
 - A. The employee who installs the lock must keep the key in his/her possession until the repairs are complete.
 - B. After locking out the power source, the employee shall try the equipment by working the controls to insure that no unintended motion will occur.
 - C. Should the employee have to leave the location prior to the repair or service being completed, he will tag out the item being repaired with the "Do Not Operate Tag", and leave the padlock in place on the energy source. The key will remain in his/her possession.
 - D. Where the power sources involve air and/or hydraulic energy, they must be evaluated in advance to determine whether they retain their pressure prior to starting repairs.
 - E. **IN ANY INSTANCE THE LOCKOUT WILL REMAIN UNTIL THE REPAIR IS COMPLETE.**

Tagout Procedures

1. When an employee recognizes that an item of equipment is unsafe by its very nature, the employee will tag out the item with a "Do Not Operate Tag", following which he/she will advise his/her supervisor.

(Illustration: If a grinding machine was observed without the protective eye shields, it must be tagged out. Similarly, if machinery is observed without belt guards, it must be tagged.)
2. The tag placed on unsafe machinery items or other unsafe systems must not be removed until the repair has been completed.
3. During formal and informal inspections by the Safety Director, tags may be placed on items requiring attention in order to meet safety requirements. In these

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instances, the tag will be returned to the Safety Director with a notation that the correction has been made.

Removal of Locks and Tags

After repairs are completed and all guards, box faces, shields, etc., have been replaced, the employee completing the repairs will be responsible for removing the locks and tags.

CONFINED SPACES ENTRY PROCEDURE (PRCS) or (CSE)

This procedure identifies the approved procedure for employees who may find it necessary to enter a confined space. The responsibility for adherence to this procedure rests with the supervisor in charge of the employees making entry and the individual employees themselves.

Note: Before entrance is made check with the local division safety manager for any farther instructions.

All EE that may have a reason to enter into a confined space area must be proper trained and certified for entry. The Beckman policy is: No PRCS entries will be made by BPS employees. If it requires the use of a SCBA because of the atmosphere is unsafe then NO entry will be made. We perform CSE only.

Confined space entry is defined as entrance into any piece of equipment or earthen pit through a manhole or other constricted opening, including vaults, pits, trenches, frac tanks, storage tanks, liquid hauling truck tanks, tank trailers or any similarly confined areas.

Confined space entry requires a written "Work Permit", which will be obtained from an authorized supervisor. In all cases alternate means for carrying out the activity will be examined by the supervisor prior to issuing the permit.

All materials known to have previously entered or been stored in the confined space shall be identified and considered.

Prior to entry into the confined space the atmosphere in the tank, ditch, vault, etc., shall be tested for combustible or explosive properties. Levels of H₂S (hydrogen sulfide) and other toxic materials and the oxygen content will be identified to determine the level of protection necessary for entry.

Tests will be made using an approved and calibrated portable gas detector(s) capable of detecting flammability, H₂S and the oxygen content. All tests should be taken in still air, at several points, remote from openings such as manholes. Where liquids and/or sludge may be present, the samples should be taken within six inches above the liquid level. Sediment present in the bottom of the vessel or in a form of scale on the sides should be tested for gases which might be liberated.

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Prior to entry into a confined space, all electrical circuits, mechanical components, and all pipes, lines and hoses leading to the confined space shall be shut-off, locked out and tagged. The confined space, when possible, shall be thoroughly cleaned by washing, steaming or ventilating prior to personnel entry.

As determined by the testing devise(s), a decision will be made as to the safety of entering the confined space. No entry will be made if the space is explosive. When readings of H₂S content is 10 (or more) ppm (parts per million) entry will not be made. If oxygen levels are less than 19.5% entry is not permitted. Steps must be taken to correct dangerous levels prior to entry. **(NOTE: MONITORING MUST BE CONTINUOUS WHILE WORKING IN A CONFINED SPACE)**

When entry is made into a confined space where supplied-air apparatus is used, each person entering the confined space must have a safety harness and a safety line to the outside area. In addition, the parties in the confined space must be under the constant surveillance of a qualified person outside the space who is similarly equipped to effect a rescue as well as raising the alarm.

During the briefing, prior to entry into the confined space, a determination will be made as to the length of stay in the confined space; air supply if self-contained; signal considerations on the safety line identifying "OK" at intervals, emergency situations, etc.

After work has begun in the confined space, additional test readings must be taken continually.

Should an employee wearing a supplied air mask notice an odor of gas, the confined space should be immediately exited and the respiratory apparatus checked.

Under no circumstances shall the employee remove a supplied-air mask while in a confined space.

Confined space entry events should only be done during daylight hours and never during an electrical storm.

When additional light is required in a confined space, only explosion-proof lights and approved flashlights must be used.

When crude oil tanks must be tested for the presence of H₂S, no work is to be undertaken if the concentration of H₂S is above the minimum safe working concentration of 10 ppm.

If anyone has problems determining the difference between PRCS or CSE contact the safety department for clarification.

This or the annual CSE awareness training DOES NOT qualify anyone to enter and conduct work in a confined space. Specialized training is required for entry. There are only a few personnel in each yard that are trained for entry.

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NOTE: All entries must be called in to safety before starting the job. The safety department will discuss the entry and the procedures and approve the entry. NO EXCEPTIONS

231-258-9524 - office
231-518-7926 – Butch Peeples
231-620-8081 – Butch Peeples cell
231-518-7927- Erica Wilson office
231-384-3627 – Erica Wilson cell

**CONFINED SPACE ENTRY
CHECKLIST**

Hazard Identification:

M.S.D.S.: Review the safety data sheet on the product that was in the tank
(Note precautions).

Gas Detectors*: Working? Calibrated? Will they detect **H2S** as well as hydrocarbons? Minimum of 1 but more may be needed depending on the size of the tank.
REQUIRES CONTINUOUS MONITORING!!!!!!!

Explosimeter*: Working? To check flammability of the air space.
REQUIRES CONTINUOUS MONITORING!!!!!!!

Oxygen Detector*: Working? Calibrated? Remember personnel may enter only when the oxygen content is +19.5%.
REQUIRES CONTINUOUS MONITORING!!!!!!!

*** A TRI-METER capable of detecting flammability, H2S and oxygen content may be used in place of the three mentioned above. The meter should have an external wand so the space can be checked without entering.**

Safety Equipment:

Work Permit: Signed and reviewed by all employees? Still Valid?

Fire Extinguishers: Charged?
Accessible?

Air Packs: Condition? Charged? Enough for the people doing the work and

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their backups? Extras should be considered, with spare bottles and/or a cascade system.

Harness and rope: As needed for rescue? Possible need for a tripod, if entering through a top hatch.

Clothes: Steel toed shoes? Rubber suits? Gloves? Safety Glasses? Goggles? Hard Hats?

Ear Plugs: May be needed for some high noise areas.

Air Movers (Fan): Explosion proof? Cord condition? Grounded? Must be large enough to move 3 tank volumes a minute.

Barriers: May be needed to prevent unauthorized entry.

Grounds: Tank and equipment must be grounded.

Lock out/Tag out:

Locks: Available? Single key? Number? Whose responsibility to install/remove?

Tags: Available? Number? Whose responsibility to install/remove?

Blinds/bull plugs: Available? Condition? Whose responsibility to install/remove?

Valves/piping: Closed? Tagged? Locked? Tested to insure closure?

***Note: All incoming piping must be disconnected or blinded.**

Tools:

Shovels/scrapers: Condition? Spark Proof?

Steamers: Condition? Spark Proof? Enough hose to be spaced a safe distance from the tank? Grounded including the wand?

Vacuum Trucks: Condition? Enough hose to be spaced a safe distance from the tank? Grounded?

Lighting: Condition? Explosion Proof? Protected?

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Personnel:

Safety training: CPR and H2S trained? MSDS reviewed?

Tailgate meeting: Are to be held daily and immediately prior to beginning the job.

Items to be discussed are:

1. MSDS considerations
2. Safe work permit
3. Personal Protective Equipment
4. Wind direction
5. Location of 1st aid supplies
6. Location and use of fire extinguishers
7. Telephone and emergency contact list

Stand-by personnel: At least one person needed as an observer, whose only job is to keep in continuous contact with the personnel in the tank.

Backup personnel: H2S rules require a 2 person backup, with required personal protective equipment.

Cascade Watch: If a cascade system is in use, there needs to be 1 person to monitor the system.

Miscellaneous.

Flammables: Remove all flammables in the area not associated with the job.

Electrical: Head switches, heat tapes and any other electrical equipment in the immediate area must be de-energized.

Tanks and tops: Must be physically isolated from neighboring vessels/equipment. Tank tops "**must never**" be trusted to hold any weight.

Tank volume: To determine tank volume use: $T = V/B$
Air changes: T = minutes for 1 tank volume air change
V = volume of tank in cubic feet
B = cubic ft/minute of blower

Divide tank volume by the blower size = Time)
(Blower must be big enough to do 3 tank volumes air exchange per minute)

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ACCIDENT INVESTIGATION

Corporate policy requires complete and immediate reporting of all accidents involving employees and/or corporate owned equipment. This includes incidents where employees or Corporate owned equipment cause damage or are involved in damage to a second party, regardless of the fact that no damage may be experienced by the company.

Employees are responsible for reporting to their supervisor any injuries they may have experienced related to their employment. In addition, the employee is responsible for reporting damage to Corporate owned equipment which they are operating or that which they observe to be damaged. Individual supervisors have the responsibility to follow-up on employee injury/damage reports with the preparation of an accident report.

Serious accidents involving immediate hospitalization of an employee; permanent type injuries or death; extensive damage to company, private or public property shall be reported immediately following the necessary medical attention to injured parties. The report shall be directed to the Beckman Division Manager's office for his and the Safety Director's attention. The report to civil authorities will be made in accordance with the law.

Supervisor's Accident/Incident Investigation Report

The Supervisor's Accident/Incident Investigation Report will be prepared by the individual who is immediately in charge of the employee who has been injured or who is in charge of the equipment which is involved. The involvement of the Corporate Safety Director does not relieve the supervisor of this responsibility. The prepared report is to be submitted to the Safety Director (or his representative) within twenty-four (24) hours of the incident.

The Safety Director shall have the responsibility for reviewing the Supervisor's Accident/Incident Investigation Report to determine that it is complete. The report will be maintained by the Safety Director with a data analysis being prepared for the safety committee and executive management.

The accident report must report, The who, what, where, when, why and how of the incident. An identification of the corrective measures to be taken or recommended is an important aspect of the report.

The following facts are necessary:

- A. Who was injured?
- B. What was he/she doing at the time of the incident?
- C. What part of the body was injured (be specific, such as; left index finger)?

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- D. What type of injury (such as; puncture, sprain, break, cut, amputation, burn, etc.)?
- E. Witnesses' names (both Beckman employees and others).
- F. What shift was he/she working and what time it occurred (such as; 1:15 a.m. or p.m.)?
- G. Date of the incident.
- H. Where the incident occurred (such as; jumping off vehicle, vehicle #; name of lease or on rig #; on specific lease, name of township and county).
- I. What caused the accident (such as; defective equipment, tripping hazard, poor housekeeping, unsafe act, etc.).
- J. What exactly happened?
- K. What was the object that inflicted the injury?
- L. What was done or should be done to prevent a recurrence of the incident?
- M. What kind of attention was given to the injury (such as; taken to Memorial Hospital in Detroit, first aid, etc.)?
- N. Identify if lost time will result and how long (number of days, indefinite).
- O. Supervisor's signature.
- P. Date the accident report was completed.

Motor Vehicle Accidents

Accidents which involve Corporate owned vehicles with another vehicle, regardless of ownership or location, or involve damage to property other than vehicles, regardless of property ownership will be reported on the Beckman Motor Vehicle Accident Report. In addition, incidents involving a Corporate owned vehicle, where damage occurs to the Corporate owned vehicle, by whatever means (wind, fire, falling objects), either attended or unattended will be reported on the Motor Vehicle Accident Report.

GOVERNMENTAL REGULATIONS RELATING TO CDL DRIVER RECORDS

- 1. Initial employment requirements:
 - a. Application form, as prescribed by regulations

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- b. Driver's record check for all motor vehicle operator licenses the driver holds
 - c. List of all violations of motor vehicle traffic laws or ordinances
 - d. Physical examination form completed/authorized by a medical examiner
 - e. Driver's Data Sheet, stating number of hours worked in the seven days immediately preceding employment with our company
2. Within 30 days of hire, reference checks must be made to each of the driver's employers during the three years preceding his/her employment with our company.
 3. Drivers must carry with them the following certificates:
 - a. A valid commercial driver's license for the vehicle type being operated.
 - b. Certificate of Qualification by Medical Examiner
 4. Subsequent required review and examinations:
 - a. Physical examination every 24 months, and/or at any time when the driver's ability to perform normal duties has been substantially impaired by a physical or mental injury or disease.
 - b. Each driver must prepare a list of violations of motor vehicle traffic laws and ordinances of which the driver has been convicted or forfeited bond or collateral. This is to be done every 12 months.
 - c. Annually, a review of each driver's driving record must be made for the preceding 12 months.

SPILL CONTROL - HAZARDOUS WASTE HAULING

In an effort to prevent the loss of oil, or other hazardous or waste materials, the following shall be closely adhered to:

1. All piping and other connections shall be continually maintained in a manner to prevent fluid from seepage or losses.
2. Surveillance shall be continually maintained while loading. All loading procedures

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shall be conducted in a manner that will absolutely prevent overflow.

3. In the event of any failure that results in the loss of oil or any other hazardous materials, the Department of Natural Resources **must** be notified without delay. **Call your supervisor for instructions.**

PHONE NUMBERS FOR REPORTING SPILLS TO THE DEPARTMENT OF ENVIRONMENTAL QUALITY for Michigan

24-Hour Service (800) 292-4706

Lansing Office (517) 373-2730

**Wyoming, Oklahoma and Pennsylvania should be reported to their individual state
required regulatory agencies**

SAFETY COMMITTEE

The Beckman Division Manager shall appoint a three (or more) member Beckman Safety Committee to aid and advice management on matters related to employee safety. One member shall be an employee in a non-supervisory capacity from the operational level. The other members shall be representative of Beckman work functions, with at least one member having first-line supervisory responsibility. Trucking, "take 2 for safety" and Rigs, Operator safety group.

The Safety Director will serve as secretary to the committee with responsibility for developing meeting schedules, agendas, and accident information for the committee. The secretary will prepare a report covering each committee meeting.

The safety committee will meet quarterly, or at the call of the chairperson, to review lost time accidents, vehicle and equipment accidents, company safety statistics, and to receive reports covering safety inspections. It shall be the task of the committee to determine responsibility in accident situations and make recommendations to the Beckman Division Manager. Recommendations may include procedure changes, training programs, equipment modifications and discipline of employees where warranted. The committee will also make recommendations regarding the Safety Incentive Program.

Quarterly, a representative of the safety committee and the Safety Director shall meet with the Corporate Safety Review Committee to report on committee activities and make recommendations.

Neither the full committee nor its individual members has the authority to change a practice, order purchase of an item of equipment, or to institute a training program. The role of the safety committee is advisory in nature and has as its purpose the review of activities, facts and circumstances in an effort to assist the Beckman Division Manager in matters related to safety.

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WRITTEN HAZARD COMMUNICATION PROGRAM

Policy Statement

To insure that employees of Beckman Production Services, Inc. who have the occasion to be exposed to hazardous chemicals, have knowledge of the various chemicals they may use or be exposed to while performing their assigned duties, a Written Hazard Communication Program has been prepared. It is the intent of the Corporation that all employees are aware of the hazards associated with the chemicals they handle and require that they follow approved procedures during the period of exposure.

The Corporation is committed to following the requirements of state and federal laws identified as "Right to Know" legislation. In keeping with the spirit of these requirements, it is the Corporation's intent to make available Material Safety Data Sheets to employees prior to and during their exposure to products covered by the statutes. It is further the Corporation's intent that employees involved be provided the necessary training to understand the contents of the Material Safety Data Sheets for purposes of individual protection.

I. Introduction

The following Written Hazard Communication *Program* has been prepared for personnel of Beckman and its various Divisions. The program is available in the Corporate Safety Manager's office and in the offices of the various Divisions for review by employees.

Administration of the Written Hazard Communication Program will be the responsibility of designated Division supervisors. Maintenance of the program is the responsibility of the Corporate Safety Director.

II. Hazard Determination

A. Beckman Production Services, Inc. and its Divisions shall rely on the manufactures of chemicals and hazardous materials covered by the Right to Know Act to provide current Material Safety Data Sheets. This information will be available prior to the use of the materials.

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- B. When Beckman personnel are employed in a service provider role the on-site Beckman supervisor will determine that the necessary Material Safety Data Sheets are available at the work location.
 - 1. The Beckman supervisor will be responsible for conducting the necessary training session(s) for the service task, including a review of the MSDS information for the chemicals in use.
 - 2. The Beckman supervisor will determine that the employees under his/her direction understand the content of the MSDS information provided by the operator and that the necessary safety requirements are being met.

III. Labeling

- A. Supervisors responsible for ordering and receiving products covered by the Act shall be responsible for determining that delivered containers have the proper labels.
 - 1. Incoming labels shall be checked for:
 - a. Identity of the product
 - b. Hazard warning
 - c. Name and address of responsible party
 - 2. Proper Storage Requirements
 - a. The receiving supervisor shall determine that products are stored in a safe and secure location conforming to climate conditions specified on the label or contained in the Material Safety Data Sheets.
- B. Individual supervisors shall be responsible for ensuring that all portable containers used in their work area are labeled with identity and hazard warning labels.
- C. Individual supervisors shall be responsible for removing labels and re-labeling containers which may be used for a different product.
 - 1. Certain containers labeled under the provisions of this Act provide instructions restricting additional use under any conditions.

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2. Container disposal may be directed by the label.

IV. Material Safety Data Sheets (MSDS)

A. General Managers of the respective Divisions shall designate a supervisor to be responsible for maintaining a master MSDS file to be kept at the principle office for each Division.

1. The Safety Director is responsible for coordinating the Program and shall be available to assist in the maintenance of the master file.

B. Distribution of MSDS

1. Copies of MSDS information for all hazardous chemicals will be available at the individual work unit under the direction of the unit supervisor prior to and during any use of a hazardous chemical.
 - a. MSDS information shall be available for review by any employee upon his/her request.
 - b. Copies of MSDS information will be distributed to supervisors at their request.

C. Purchase and Receipt of Hazardous Chemicals

1. The purchasing supervisor shall request from the manufacturer, MSDS information on all new hazardous chemicals at the time the ordering takes place.
 - a. Upon receipt of a hazardous chemical, for which an MSDS is not in the master file, it shall be determined whether the proper MSDS information accompanies the product.
 - b. If the MSDS is not received with the shipment, the purchasing supervisor will prepare a communication to the manufacturer requesting the information immediately, with a copy of the letter kept on file.
 - c. No hazardous chemical for which an MSDS is not on file shall be used in the work place until a MSDS is received by the Division supervisor and the appropriate training given to the employees.

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2. On receipt of new hazardous chemical MSDS information, the purchasing supervisor shall immediately provide the supervisor maintaining the master MSDS file with a copy.
3. The Corporate Safety Director and supervisor maintaining the master MSDS file will be supplied with copies of all new and revised MSDS information upon receipt by the purchasing supervisor.

V. Employee Training

- A. The Corporate Safety Director shall coordinate and maintain records of training at Beckman, of all personnel in each Division.
 1. New employee orientations shall include MSDS training prior to their initial work assignment.
 2. Prior to introduction of a previously unused hazardous chemical into the work area, each employee will be given additional training regarding the information contained in the MSDS and the Division procedure for handling the chemical or hazardous material.
- B. Operational Training
 1. Initial Training
 - a. All field and operational employees who have the potential to be exposed or come in contact with hazardous chemicals will be required to attend a safety class covering this plan and the MSDS information relating to the known Division inventory of hazardous chemicals as well as chemicals used frequently by other operators and contractors in the area.
 - b. Attending employees will be provided handout data covering known hazardous materials commonly associated with their work assignment with information on:
 - Chemicals and their hazards in the work area;
 - How to lessen or prevent exposure to these hazardous chemicals;Applicable Division policy and procedure to lessen or prevent

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- employee's exposure to hazardous chemicals;
 - Procedure to follow if they are exposed to hazardous chemicals;
 - How to read and interpret labels and MSDS relating to Division operations.
- c. Attendance Reporting
- Attending employees shall sign a form acknowledging receipt of the handout material and the training.
 - The roster will be maintained in the Division Safety Training file.
- d. Training Outline
- A training outline is included as an annex to this program.
2. Field Training
- a. There may be occasions when performing service work when the operator/contractor will require the use of hazardous chemicals not previously covered in a training session. When such an occurrence is identified, the on—site supervisor will initiate the following procedure:
- Obtain a MSDS from the operator/contractor, company man, etc.;
 - Hold an on-site safety meeting detailing the following:
 - Identify the hazardous chemical or material;
 - Review the appropriate MSDS;
 - Indicate measures employees can take to protect themselves from the described hazards;
 - Indicate the specific procedures which will be used to provide protection, such as work practices, engineering controls, and the use of personal protection equipment;
 - Review methods and observations, such as visual appearance or smell, which employees can use to detect the presence of a hazardous chemical to which they may be exposed;
 - Go over the emergency first aid procedures for exposure to the hazardous chemical or material as outlined in the MSDS.
 - Identify the local emergency resources, such as ambulance, hospital, fire and police;

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- Establish and review a team reaction plan for use in an emergency at the work site;
- Complete a Field Training Report identifying the hazardous chemical
- and the training given. List all those in attendance and have each
- attendee initial the report;
- Post the appropriate MSDS in the most available location for easy reference and review.

3. Monthly Safety Meetings

- a. A portion of each monthly unit safety meeting will be devoted to a review of MSDS information and the necessary handling procedures for hazardous chemicals.
 - Specific attention will be given to shop and maintenance area procedures.
 - Hazardous non-routine tasks will be reviewed.
 - Employees will be made aware of the availability and location of MSDS information.

VI. Informing Contractors/Operators

- A. It will be the responsibility of the Division General Managers to develop a procedure to provide for advising contractors, subcontractors, operators and/or their employees, or other persons at the Beckman operated work sites, of the exposure and potential dangers of hazardous chemicals present during service, drilling or treating activities.

1. Such procedure will include information, training and acknowledgement of information relating to:
 - a. The hazardous chemicals they may be exposed to on the job site;
 - b. Individual protective procedures to be taken;

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- c. Applicable Beckman Division policy and procedure to decrease risks;
 - . Location of MSDS information at the site;
 - e. Identification of local medical resources, in the event of an emergency;
 - f. Emergency first aid procedures to be followed, when exposure takes place.
 - g. The procedure the Beckman Division employees will follow when handling hazardous chemicals or materials.
2. A Field Training Report will be completed in each instance where non-Beckman Division employees are informed of the procedure listed in 1 (a-g) above, with a listing of names and their acknowledging signatures.
 3. A copy of the completed Field Training Report will be submitted to the Corporate Safety Director with a copy to be forwarded and maintained with the Division Master MSDS file.
 4. In all cases, non-Beckman Division employees will be informed of the intended use of hazardous chemicals and the briefing will be held prior to commencement of the actual work.

VII. Listing of Hazardous Chemicals

- A. Inventory of Hazardous Chemicals
 1. The respective Beckman Divisions will develop, as an annex to this plan, to be kept with the MSDS file, with a copy to the Corporate Safety Director, a listing of all hazardous chemicals they have in inventory.
 - a. In cases where a hazardous chemical is not an inventory item but is commonly used, it shall be identified as such.
 - b. A separate section will be maintained in the master MSDS binder for inventory items.

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PERSONAL PROTECTIVE EQUIPMENT (PPE)

1. GENERAL

All employees working for BPS in field related activities shall wear the appropriate personal protective equipment (PPE). It is the responsibility of each person to wear PPE as required by the specific task being performed, the potential hazards that a person will be exposed to, and the specifics of the job site. There may be specific guidelines set by the customer and their safety program that also may need to be followed, always check with company personnel before starting a job. There are specific PPE requirements recommended on the Material Safety Data Sheets (MSDS) if you are working with any chemicals that should be strictly adhered to. In addition to field operations employees working at BPS yard or shop locations should be aware of PPE requirements in place at each location. Check with the area Manager to insure you are meeting all of his requirements.

Tank tops, sleeveless shirts, short pants, cut-off pants are not permitted.

Loose clothing is prohibited around rotating or moving equipment.

Rings, neck chains, hanging ear rings or body piercing not covered by clothing must removed or secured with tape before engaging in manual labor.

Long pants and shirts with sleeves must be worn at all times while working.

Discuss issues with your supervisor or contact the safety department if you have any questions.

2. HEAD PROTECTION

An approved ANSI Z89.1 Class B (plastic) hard hat shall be worn by all employees working in BPS field operations at all times except while in vehicles, living quarters, doghouses, offices, and control rooms. Each BPS yard may have specific requirements for working in the yard or shop areas. Consult with your local Superintendent for details.

3. EYE PROTECTION

Safety glasses with side shields shall be worn by all employees working in BPS field operations at all times except while in vehicles, living quarters, doghouses, and offices. All eye protection must comply with ANSI Z87.1. During night operations, only clear or amber colored safety glasses shall be worn. Contact Lenses may be worn; however, safety glasses with side shields are required. OSHA does not allow contact lenses to be worn while using a respirator.

When performing work where safety glasses do not provide adequate protection, such as use of high pressure washer, handling chemicals, etc. other appropriate eye protection such as goggles, etc. shall be worn. Hard hats with full face shields will be required for all buffing and grinding operations.

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Welding Specific – Welding hoods shall be used during all arc-welding operations. Goggles or other suitable eye protection with the appropriate filter lenses shall be used during all gas welding, gas cutting or bracing operations. All filter lenses and plates used in welding hoods and goggles shall meet the test for transmission of radiant energy prescribed in ANSIZ87.1. Welders' helpers and entry attendants shall use proper eye protection. When engaged in a welding or cutting activity, safety glasses with side shields will be worn by welders and welders' helpers.

4. FOOT PROTECTION

Steel toe or a non-conductive (electrician's) safety toe shoe or boots with the non-skid soles shall be worn at all times while working in a BPS field operations, except for in vehicles, offices, living quarters, and doghouses. All safety toe shoes must comply with ANSI Z41.1.

Visitors not performing work on a BPS location may not be required to wear steel toe shoes in certain areas if escorted by a designated employee. Consult with the local BPS representative and the customers representative.

5. HAND PROTECTION

Appropriate gloves shall be worn when the hands are exposed to hazards such as cuts, punctures or abrasions (cloth, leather or leather-palmed gloves); when handling chemicals or hazardous material where absorption is a concern (rubber gloves); and when performing electrical work (certified gloves for electrical work).

Welding Specifics – Flameproof gauntlet gloves shall be used during all arc welding, gas welding, or gas cutting operations except when engaged in light work such as test fitting pieces.

6. HEARING PROTECTION

Hearing protection shall be worn in all high noise areas or whenever a high-noise warning sign is posted.

7. PROTECTIVE CLOTHING

Special protective clothing shall be worn when handling chemicals or in other hazardous situations as specified by the Material Safety Data Sheet (MSDS). Clothing worn while working on live electrical equipment shall be 100% cotton, wool or a cotton-wool blend.

Working on or near high traffic areas all personnel shall wear high-visibility work vests, preferably fluorescent orange in color.

FRC (Flame Resistant Clothing) MUST be worn while working on all well sites or facilities. The uniforms (FRC) are rented and provided to Beckman employees.

8. FALL PROTECTION

Fall protection equipment shall be worn when working or climbing more than six (6)

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feet above an established working surface (ground or deck); when specified on a warning sign; or when an immediate danger exists below the working surface regardless of the height and no guard rails are present. All components of the fall protection system must comply with ANSI Z359.1

Working above six (6) feet

Any employee working or climbing more than six feet above an established working surface (ground or deck) shall use one of the following means of primary fall protection:

- The preferred system for primary fall protection consists of: (a) a full body harness; (b) shock absorber; (c) clevis with cotter pin locking device or snap hooks with an inward moving, self-closing, and self-locking keeper (latch or gate) so that the keeper remains closed and locked until unlocked and pressed open for connection or disconnection; and (d) nylon lanyard (steel or rope lanyards are not allowed) attached to a stationary BECKMAN PRODUCTION SERVICES, INC
- Support - the lanyard will be attached to a stationary support in a manner that will prevent

A free fall of more than six (6) feet or even less than six feet if an immediate danger exists below the working surface regardless of height.

- A retractable lifeline (inertia reel) attached to a full body harness may be used with appropriate BPS safety department approval.
- A cable-grabbing device attached to a static line may be used with appropriate BPS approval.
- When ascending or descending a derrick ladder, using the derrick climber line through a fall arresting device and connected to a counterweight, the derrick belt must be used in conjunction with the full body harness. The derrick belt should be worn over the full body harness and attached to the derrick climbing line.

SERVICE RIGS;

- **Rig floors on all BPS rigs elevated above four (4) feet shall have guardrail installed in pockets a minimum of six inches deep or pinned in place.**
- **Rig floor support chains should secure to the floor.**
- **All walkways on the operator side of the rig should have hand rails in place and securely pinned.**
- **The stairs leading to the operator stand shall have handrails on both sides, either set in pockets or pinned.**
- **Each rig floor should be equipped with a stairway for easy egress.**
- **All rigs should be equipped with Climb Assist SRL units for derrick climbing.**

8.2 Care and inspection of fall protection equipment

Fall protection devices such as body harnesses, lanyards, static lines with the cable-grabbing device, inertia reels, etc. shall be inspected before each use and replaced if necessary. Fall protection equipment, which has been involved in a fall, shall be replaced.

Full body harnesses and lanyards shall be kept clean and never laid down in drilling mud, water, dirt, etc. All fall protection equipment shall be placed in a proper storage when not in use. Only approved cleaning products for full body harnesses and lanyards shall be used in order to not diminish the rated capacity of the device.

8.3 Lifting of Personnel with Air Hoist or Hydraulic winch

Work procedures requiring personnel to be lifted on an air hoist or hydraulic winch line shall be avoided as much as possible by redesigning the work procedure, equipment, etc. However, there will be certain circumstances, especially in drilling and well servicing operations, which will require personnel to ride an air hoist or hydraulic winch line. The following procedures shall be adhered to during personnel lifts on an air hoist or hydraulic winch line.

- Primary Fall Protection – The rider shall wear a full body harness designed and certified for lifting personnel. The full body harness still comply with ANSI Z359.1 and have certification that states that the harness meets or exceeds the load weight that may be imposed on it. The personnel lifting hook shall either be a clevis with a cotter pin locking device or a snap hook design with an inward moving, self-closing, and self-locking keeper (latch or gate) and will be attached to the front of the full body harness. Knots used in chains for lifting personnel are prohibited.

The air hoist and/or hydraulic winch shall be specifically designed and certified for personnel lifting. It shall have a self-centering control that, when released, returns to a positive locking/braking action in a center position. Freewheeling air hoists or hydraulic winches are prohibited air or hydraulic power shall be necessary to operate the hoist in either direction. The use of catheads or cat-lines for lifting personnel is prohibited. A shut-off valve that is easily accessible by the operator shall be attached to the air hoist and/or hydraulic winch.

- Secondary Fall Protection – Secondary fall protection is required for personnel riding an air hoist or hydraulic winch in the derrick of a rig and/or in situations where it is necessary to unhook to change locations. Secondary fall protection shall be in the form of a static line with a cable-grabbing device attached or a sala block (inertia reel or retractable lifeline) and will be attached to the back of the full body harness.
- All components of the personnel lifting system including cables, air hoists or hydraulic winches, connections, full body harnesses and lifting hooks shall be inspected before each use and replaced if necessary.
- The lifting cable shall utilize factory-installed wire rope clamps and thimbles.
- All of the referenced hoisting equipment and devices shall have a minimum workload of 4,000 pounds.

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- Lifting personnel on an air hoist or hydraulic winch line while the line is carrying another load is prohibited.
- Rotating equipment shall not be engaged while lifting personnel on an air hoist or hydraulic winch line.
- There shall be visual contact between the operator of the air hoist and/or the hydraulic winch and the person being lifted at all times.
- The operator of the air hoist and/or the hydraulic winch shall remain at the controls at all times while lifting, suspending or lowering personnel.
- An easily accessible emergency power isolation control shall be attached to the air hoist and/or hydraulic winch.

8.4 FALL PROTECTION DURING ONSHORE RIG MOVES

Some specific areas where fall protection must be worn during onshore rig moves

- When the permanent guard rails on the rig floor are removed during rig down and when rigging up, temporary guardrails such as properly strung cable shall be installed (cable should be installed prior to removing the permanent guardrails). If it is not possible to install temporary guardrails, a full body harness with a shock –absorbing lanyard attached to a stationary support as described in 8.1 above shall be used.
- When dismantling the derrick and substructure, fall protection will be continually used. This may be accomplished by:
 - a. Use of man-lifts
 - b. Use of a cable-grabbing device attached to a static line that is properly secured inside the derrick mast.
 - c. Use of inertia reel, double lanyard climbing method, or properly secured portable ladder to safely access the derrick.
 - d. Providing a retractable stand to connect and disconnect derrick-raising lines on A-frame type rigs.

8.5 GUARD / HAND RAILS & BARRICADING

Guard / Hand rails and or barricading shall be provided for:

- A walkway or wall opening from which there is a drop of more than 4 feet.
- An open-sided working surface from which there is a drop of more than 6 feet. V-doors on rig floors are one such example and should have a guard rail, safety chains or safety cable across the opening when pipe is not being picked up or laid down.
- Walkways with missing, broken or loose guardrails shall be taken out of service until repaired.

Each operating division shall access their working location by conducting a Hazard analysis to determine the appropriate PPE needed to protect their employees.

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DRUG AND ALCOHOL PROGRAM

The Beckman Production Services, Inc. Drug and Alcohol program is a separate policy. It is an attachment to the Accident Prevention Program. Copies can be obtained through the Kalkaska office.

There are numerous policies and procedures in place that were not covered in this program. If you have any questions or concerns, please contact the Safety Department in Kalkaska, Michigan.

Office; 231-258-9524

Safety Director Cell: 231-620-8081

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