

## SAFETY PLAN

**APPLICATION FOR APPROVAL OF  
THE DEVELOPMENT PLAN FOR  
PARSONS LAKE FIELD  
PROJECT DESCRIPTION****HEALTH, SAFETY AND ENVIRONMENT****11.1.1 HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT PLAN**

The health, safety and environmental management plans presented in this development plan application and in EIS Volume 7 are broad and conceptual. Before construction and drilling begins, ConocoPhillips will prepare detailed, functional plans that will incorporate feedback obtained through the regulatory review process. Similarly, leading up to production facilities and flow line commissioning and start-up, detailed operations plans will be prepared and submitted.

The Environmental Protection Plan in EIS Volume 7 describes conceptual environmental protection measures that will limit the environmental disturbances associated with the project's design and construction. In addition to being used for design and construction, these conceptual environmental protection measures can be used for project activities during pre-construction, operations and reclamation, for the Parsons Lake field development.

Similarly, the environmental contingency plans in EIS Volume 7 describe procedures to be implemented if unforeseen events that could have environmental or socio-economic impacts occur during construction, drilling or operations. The environmental protection measures and the environmental contingency plans described in the EIS will evolve as Parsons Lake engineering design advances and site conditions are better understood. More site-specific environmental protection measures and contingency plans will then be formulated.

As the Parsons Lake field development advances through conceptual, preliminary and detailed engineering and pre-construction planning, and as input is received through community consultations and regulatory reviews, ConocoPhillips' health, safety and environmental management plans will be revised and updated to meet the:

- needs of ConocoPhillips and its contractors
- requirements of the regulators
- expectations of the public and northern residents

**11.1.2 POLICY AND LEADERSHIP****11.1.2.1 Background**

ConocoPhillips' health, safety and environment (HSE) policy describes its intentions and goals for health, safety and environmental performance. The policy defines the primary HSE requirements in performing business activities. Implementing this policy is the objective of the HSE management system and the responsibility of all company employees. The HSE policy provides an overall standard for activities at ConocoPhillips' locations and facilities. It also provides a reference point for business decisions, from selecting resources to designing and operating working systems.

**11.1.2.2 Health, Safety and Environment Policy**

ConocoPhillips is committed to protecting the health and safety of everyone who has a part in its operations, lives in the communities in which it operates, or uses corporate products. Wherever it operates, ConocoPhillips conducts its business with respect and care for the local and global environment, and systematically manages risks to drive sustainable business growth. The company will not be satisfied until it succeeds in eliminating all injuries, occupational illnesses, unsafe practices and incidents of environmental harm from its activities.

To meet its commitment, ConocoPhillips will:

- demonstrate visible and active leadership that engages employees and service providers in managing HSE performance as a line responsibility with clear authorities and accountabilities
- ensure that all employees and contractors understand that working safely is a condition of employment, and that they are responsible for their own safety and the safety of those around them
- manage all projects, products and processes through their life cycles in a way that protects safety and health and minimizes impacts on the environment
- provide employees with the capability, knowledge and resources necessary to instill personal ownership and motivation to achieve HSE excellence
- provide relevant safety and health information to contractors, and require them to provide proper training for the safe and environmentally sound performance of their work
- measure, audit and publicly report HSE performance and maintain open dialogue with stakeholder groups and with communities within which it operates
- work with governments and stakeholders to develop regulations and standards that improve the safety and health of people and the environment

- maintain a secure work environment to protect its employees and contractors and corporate assets from risks of injury, property loss or damage resulting from hostile acts
- communicate its commitment to this policy to its subsidiaries, affiliates and contractors, and to governments worldwide, and seek their support

### 11.1.2.3 Roles and Responsibilities

As a condition of employment, employees and contractors must adhere to ConocoPhillips' policies.

#### **President of ConocoPhillips**

The president of ConocoPhillips has overall responsibility and accountability for the health, safety and environmental performance of everyone working at ConocoPhillips' business locations.

The president is also accountable for implementing the HSE policy and for ensuring that business activities are performed without undue risk to personnel, the environment or ConocoPhillips-operated assets.

#### **Line Managers**

Line managers are accountable and responsible for ensuring compliance with ConocoPhillips' policies and regulatory requirements. All managers and supervisors are responsible for taking a visible and proactive leadership role in creating a strong and active HSE culture, and for implementing the HSE management system in their areas of responsibility. They demonstrate their commitment to policy and principle by:

- communicating the HSE policy and programs across ConocoPhillips
- actively leading and participating in HSE audits
- setting HSE goals and monitoring their achievement
- maintaining direct involvement in understanding and improving HSE performance

#### **Health, Safety, Environmental and Sustainable Development Group**

The health, safety, environmental and sustainable development (HSE & SD) group is responsible for providing advice, guidance and technical support to enable line managers to discharge their responsibilities.

#### **Managers and Supervisors**

All managers and supervisors are responsible and accountable for ensuring that the documented HSE management system is communicated, implemented and maintained within their area of responsibility. They are also responsible for:

**Managers and Supervisors (cont'd)**

- expediting solutions to HSE-related issues
- HSE personnel orientation
- maintaining health, safety and environmental awareness

**Staff and Contract Personnel**

All ConocoPhillips staff and contractors are responsible for their own health and safety, and the health and safety of others. They are required to comply with ConocoPhillips' policy, work within the HSE management system, and follow safety practices, appropriate procedures, including incident reporting, and work instructions.

**11.1.2.4 HSE Committees and Meetings**

Health, safety and environmental committees and meetings are required at various levels throughout ConocoPhillips. Committees are empowered to act within their assigned areas of responsibility. Each region has at least one HSE leadership team. Operations supervisors determine the specific structure and membership of the team, based on business objectives and individual circumstances. The team must include a mix of line managers and workers. Contractor representatives might be included where they have a significant role in accomplishing business objectives.

Safety and environmental committees and meetings:

- provide a forum for personnel to raise issues and concerns about safety and health
- provide input for HSE improvements and standards
- contribute to managing health, safety and the environment

The key roles of HSE committees and meetings include:

- ensuring that information on workplace hazards is communicated effectively
- monitoring corporate HSE performance
- ensuring that personnel participate in safety and health briefings and presentations

**11.1.2.5 HSE Advisory Committee**

The HSE advisory committee is accountable for the HSE management system. The committee members include:

- the vice president of HSE & SD
- the operations services manager

- one or more asset managers
- the HSE management system coordinator

The committee ensures that the HSE management system is maintained, reviewed, updated and audited in compliance with ConocoPhillips' policy and standards.

#### 11.1.2.6 Training

All ConocoPhillips staff and contractors are required to complete specific HSE training related to their work assignments. This training includes employee orientation, regulatory required training and operator and mechanical skills training. The level of training required is based on the degree of risk and the complexities of the actions required to control or reduce the particular risk. Measures are in place to assess the competency of those trained, determine the effectiveness of the training programs and effectively maintain training records.

### 11.1.3 PARSONS LAKE FIELD SAFETY REQUIREMENTS

As operator of the Parsons Lake field throughout construction, operations, abandonment and reclamation, ConocoPhillips will conduct its business in ways that:

- prevent injuries
- protect the general public
- protect the environment
- protect its property

ConocoPhillips will also comply with regulatory requirements, including those of the Workers Compensation Board Act and the Occupational Safety and Health Act and Regulations.

ConocoPhillips will provide:

- a safe and healthy workplace
- a workplace that does not tolerate harassment
- a safety, security, and environmental orientation for all personnel
- training and supervision to ensure that personnel work safely
- personal protective equipment and clothing for its employees

ConocoPhillips will:

- adhere to standards and procedures that prevent incidents and promote health, safety and environmental stewardship
- unless otherwise approved, limit the field work day to 12 hours, which applies to all work activities on the project, including travel, field work, community visits, meetings and contractor supervision

**11.1.3 PARSONS LAKE FIELD SAFETY REQUIREMENTS (cont'd)**

ConocoPhillips will actively encourage participation by workers and contractors in its HSE loss prevention program and will encourage suggestions for improvement. All incidents will be investigated and analyzed, and all emergencies will be responded to quickly and effectively.

**11.1.4 CONTRACTOR HSE MANAGEMENT PROGRAM**

The contractor HSE management program is intended to build partnerships between ConocoPhillips and its contractors. The goals are to create an incident-free culture and to ensure that all business activities across the life cycle of exploration and production operations are conducted to recognize and protect the health, safety and environment in a way that is consistent with ConocoPhillips' HSE policies and principles.

Active and ongoing participation by the company and contractors is essential to achieve an incident-free workplace. The company and contractors have a distinct role in ensuring the ongoing safety of all involved. The company–contractor relationship can be enhanced by clearly defining roles and responsibilities, establishing expectations, and maintaining communications throughout the life cycle of the relationship.

This program is designed to:

- improve workplace safety, health and environmental performance by assisting the company and contractors in administering an effective HSE program for the job, project and contract
- assist contractors in administering programs that are consistent with the company's expectations and applicable regulations
- facilitate the interface between contractors' activities and those of the company, other contractors, and subcontractors
- protect the company's and contractors' personnel from workplace injuries and illness, and from losses associated with the incidents, while preserving the independent contractor relationship
- help company and contractor management visualize the process of managing the contractor HSE program
- assess the risk associated with the contractor's role

This program is for personnel responsible for:

- contracting company activities

- interfacing with and providing operational oversight of contractors, their employees and their subcontractors

It applies throughout the life cycle of the ConocoPhillips-operated assets, and was developed to address typical activities expected within the ConocoPhillips exploration, development, production and midstream operations.



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## SAFETY PROGRAM

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**11.2.1 SUBSTANCE ABUSE**

To minimize the risk of impaired performance because of substance use, ConocoPhillips staff, consultants and contractors will abide by all policies regarding the prevention of substance abuse in the workplace. The following rules apply to everyone while at the work site or while on duty:

- No worker will use, possess or offer for sale illicit drugs, illicit drug paraphernalia or unprescribed drugs for which a prescription is legally required in Canada.
- No worker will use, possess or distribute alcoholic beverages, or offer alcoholic beverages for sale.
- No workers deemed safety sensitive will have a blood alcohol concentration of 0.02% or higher.
- Workers might be subject to pre-access testing for safety sensitive positions, including the access requirements for construction of facilities or to maintain access for operational requirements.
- No worker will misuse prescription medications, over-the-counter medications or nonprescription drugs.
- No worker will be unfit for work because of the use or after-effects of alcohol, illicit drugs or unprescribed drugs for which a prescription is legally required in Canada. This also applies to the intentional misuse of medications.
- No worker will be unfit for work because of the effects of the legitimate use of prescription or over-the-counter medications.

If workers are taking prescription or nonprescription drugs that have the potential for unsafe side effects, they must report it to their supervisors. Supervisors will take the action they consider necessary under the circumstances.

Workers must be prepared to demonstrate that any drugs they carry are required for a medical condition.

**11.2.2 PERSONAL PROTECTIVE EQUIPMENT**

All workers will wear the personal protective equipment (PPE) appropriate for the work being undertaken. PPE will meet or exceed legislated requirements, and supervisors will strictly enforce the use of PPE. Contractors will provide PPE for their employees.

**11.2.3 WORKING IN ISOLATED AREAS**

At certain times, workers will work alone in remote areas. A risk assessment must be done to determine if there are incremental risks to the worker in this situation. Workers are required to comply with applicable regulations and the ConocoPhillips safe operating procedure for working alone.

**11.2.4 PREVENTIVE MAINTENANCE**

ConocoPhillips' and contractors' tools, equipment and vehicles will be maintained to comply with regulatory requirements, industry standards and manufacturer's specifications. A preventive maintenance schedule for key tools and equipment will be established, and an accredited or certified company or contract maintenance personnel will provide servicing and repair.

Properly trained workers need to work with tools and equipment that are regularly inspected and maintained in good repair. An effective maintenance program is a vital part of safety and loss prevention efforts, and reduces injuries, environmental degradation and property damage.

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## HSE MEASURING AND MONITORING

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**11.3.1 INCIDENT INVESTIGATION AND REPORTING**

All near misses and incidents will be thoroughly investigated and reported. Investigating, analyzing and reporting leads to preventing similar occurrences in the future.

**11.3.1.1 Near Misses**

Near misses are events that, under slightly different circumstances, could have resulted in injury, damage or loss. ConocoPhillips expects near misses to be recorded using the appropriate company system.

**11.3.1.2 Incidents**

Incidents include any unplanned or undesirable events that result in injury, damage or loss. For example, incidents are events that result in:

- lost-time injury or occupational illness
- medical-aid injury with no lost time
- vehicle damage
- equipment and property damage
- environmental damage or spill
- exposure to toxic gases or chemicals

Incidents must be reported to supervisors immediately. Supervisors will immediately report the incident by telephone to ConocoPhillips' health, safety and environment advisor. All incidents are to be entered in the Incident Investigation Management (IIM) system.

**11.3.1.3 Investigation and Reports**

Incidents and near misses will be investigated and reviewed by the site manager and contractor representatives. The investigation should emphasize prevention rather than blame those involved.

A report will be prepared by the immediate supervisor and include:

- a description of the incident
- the names of any person injured and the nature of the injury
- a list of damaged items
- the value of any losses

**11.3.1.3 Investigation and Reports (cont'd)**

- a description of causes
- a description of all remedial action taken
- a plan of future action required to prevent recurrence
- the name of the person responsible for future action

The initial report must be prepared and submitted to ConocoPhillips within 24 hours of the incident. The follow-up report will be submitted immediately after the investigation is completed and the corrective actions are identified. Supervisors are responsible for ensuring that corrective actions have been completed.

**11.3.2 RECORDS AND STATISTICS**

Because safety program management is a dynamic process, records and statistics will be maintained to provide easy reference to program activities and performance. This allows supervisors and managers to monitor the effectiveness of safety and loss management systems and to reinforce safety program objectives.

Contractors will provide monthly copies of their safety performance records to the ConocoPhillips health, safety and environment advisor in Calgary.

The health, safety and environment advisor will maintain records of ConocoPhillips' program activities so that each program can be assessed and adjusted to improve its effectiveness. Program records will include:

- employee general safety orientation
- employee job-specific training
- hazard assessments
- vehicle pre-use checkout reports
- first-aid treatment reports
- incident investigation reports
- safety meeting records

First-aid records and accident and incident investigation reports must be kept on file to meet regulatory requirements.

Accident and incident investigation reports and first aid records will be used to prepare a statistical record of performance for each work site. A monthly injury summary of lost time, medical aid and first aid injuries will be maintained for each work site. This report will be used to prepare a yearly injury summary that will also include lost-time injury frequency and severity. A separate lost-time injury summary will also be maintained, and the recordable injury frequency will be calculated.

An injury analysis will be completed regularly. The analysis will categorize injuries according to their frequency, severity, accident type and part of body injured. Significant trends will be identified and corrective action will be taken.

Vehicle performance records will be maintained. An annual summary of vehicle accidents and kilometres driven will be prepared. An analysis will be completed to review base causes and to identify significant trends. Corrective action will be taken, which might include defensive driver training.



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## EMERGENCY RESPONSE PLAN

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**11.4.1 EMERGENCY PREPAREDNESS****11.4.1.1 Corporate Standard**

The ConocoPhillips Emergency Response Plan standard includes a process for identifying and reviewing potential emergency situations and for planning how to mitigate and control incidents. An Emergency Response Plan for the Parsons Lake field will be developed and maintained to address potential situations requiring emergency actions in the Parsons Lake field. It will also be filed, as required, with applications for authorizations needed to develop the Parsons Lake field.

**11.4.1.2 Corporate System**

The ConocoPhillips emergency response system is consistent with the Emergency Response Plan standard and appropriate Canadian regulations. The system is reviewed and updated regularly to reflect organizational requirements. ConocoPhillips employees participate in a corporate Incident Management Action Team, which provides support for major incidents in North and South America.

The ConocoPhillips emergency response system currently includes:

- a corporate emergency response plan
- trained individuals with specific responsibilities in an emergency
- a weekly on-call roster process
- an escalating response approach to all emergencies
- a ConocoPhillips North American crisis management plan and support team
- coordination with applicable federal, territorial, provincial and municipal plans

The ConocoPhillips emergency response system will incorporate the:

- Parsons Lake regional emergency response plans
- Parsons Lake facility-specific emergency response plans

**11.4.1.3 Roles and Responsibilities**

Specific roles and responsibilities for emergency preparedness will be defined in the Parsons Lake site-specific emergency response plans, as part of ConocoPhillips' emergency response system.

The vice-president of ConocoPhillips' HSE & SD or a designate will:

- ensure that the emergency response system is maintained
- maintain and issue the weekly on-call roster, which will identify individual roles, including those to be assigned to the Parsons Lake site-specific emergency response plans

Parsons Lake site supervisors will conduct regular drills in their areas, and submit reports to the vice president of HSE & SD. These reports will include lessons learned and all corrective actions taken.

**11.4.1.4 Training**

ConocoPhillips employees and contractors working at Parsons Lake will:

- be trained in the overall incident command system structure
- have individual roles in the site-specific emergency response plans
- participate in actual drills