VENOCO, INC.

CONTRACTOR SAFETY MANAGEMENT PROGRAM
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<td>1</td>
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1.0 Purpose

1.1 VENOCO is committed to safety as a key company value. VENOCO believes that all work-related injuries and accidents are preventable. Contractors directly affect VENOCO's performance in promoting and maintaining a safe and healthful workplace. Contractors are an integral part of VENOCO's business and therefore we expect contractors to provide the same commitment to safety and loss prevention.

1.2 The purpose of the Contractor Safety Management Program (CSMP) is to establish standards for the qualification and approval of contractors; set policies and expectations for contractors performing work on Venoco assets; and establish roles and responsibilities for Venoco personnel and contractors throughout the Venoco/Contractor relationship.

2.0 Scope

2.1 This program applies to all contractor services such as performing drilling or well servicing operations; production or pipeline operations; maintenance, repair, construction or inspection; or specialty work on offshore platforms or trucking at production or process facilities and lease locations working under a Venoco Master Service Agreement (MSA).

The program may also apply to certain specified contract services under a Venoco Purchase Service Agreement (PSO).

2.2 This program does not apply to contract services that do not take place in the process, production, or facility or lease operating area or are considered incidental such as galley service, food and drink service, laundry, delivery and supply services, weed abatement, general consulting and engineering, administrative, etc.

3.0 Policy

3.1 The Contractor Safety Program is applicable to all Venoco Inc. assets to ensure contractors and subcontractors perform in accordance with regulatory health and safety standards, and within Venoco procedures and practices. Complete implementation of this program will satisfy the requirements of:

3.1.2 Minerals Management Service requirements for API RP 75, Safety and Environmental Management Program.; and

3.1.3 API Recommended Practice 2221, Implementing a Contractor Safety and Health Program.

3.2 Contractors must have in place policies and procedures governing occupational safety & health working conditions, and work practices that meet or exceed applicable local, State and Federal standards, and are at least as protective as those governing Venoco employees.

3.3 Contractors are responsible to provide a safe and healthful work environment for their employees and subcontractors, and shall work in such a manner so as not to endanger themselves, Venoco employees, property, or the environment. Contractor shall not permit hazardous, at-risk, unhealthful, or environmentally unsound condition or activity over which it has control, to be conducted on Venoco property or at Venoco work locations.

3.4 Contractors must assure a drug-and-alcohol-free work place. All contractors performing “risk-sensitive” job functions are subject to the conditions and prohibitions of Venoco’s Drug Abuse and Alcohol Misuse Prevention Policy. Venoco may at its sole discretion, include other “comparable” job functions as covered by its Program. Contractors performing work on Department of Transportation (DOT) regulated pipelines must have a DOT compliant substance abuse prevention program, 49 CFR Part 199 Subpart 40. The contractor must agree to third party auditing of its program, the program must be deemed “approved” prior to the start of work.

3.5 No employee of a contractor will perform any “Covered Task” as defined by 49 CFR Part 192 subpart N and Part 195 subpart G, the DOT Operator Qualification Rule involving a pipeline owned or operated by Venoco until the employee(s) has demonstrated qualification (see Appendix B) to perform the “Covered Task” and has provided adequate documentation to Venoco.

3.6 All contractors will be pre-qualified by completing the Venoco Inc. Contractor Pre-Qualification Safety & Health Questionnaire
3.7 Contractor will review the Venoco General Safety Orientation Information (Appendix C) with its employees assigned to the job; and discuss any site specific or job specific safety issues with the Venoco Project Manager prior to the start of work.

3.8 Contractor will participate in a post-job evaluation (Appendix D) if requested by Venoco.

3.9 Contractors are subject to a safety audit with no previous notice. The Contractor shall grant Venoco access to records and its premises and those of its subcontractors to verify compliance under this Program.

3.10 The contractor shall submit a monthly safety history report (Appendix E), if requested, to Venoco for the duration of the project or services contract.

3.11 The Venoco asset manager shall ensure that Contractor Safety Management Program is properly implemented. Exemptions or deviations from this program must be approved in writing by a Venoco V.P.

4.0 Program Responsibilities and Requirements

4.1 Venoco Sponsor

The “Venoco Sponsor” means the Venoco Department Manager, Project Manager, Facility Supervisor, Construction Supervisor, Field Foreman, or designee responsible for the contracted services. The Venoco Sponsor has the responsibility to:

4.1.1 Ensure that only newly “approved” contractors or those listed in the “Approved Contractors Database” are utilized for projects and services as described in paragraph 2.1.

4.1.2 Ensure the identification of known hazards related to the contractor's work, the work area and the facility processes that may affect the work area;

4.1.3 Ensure the opportunity for the contractor to review Venoco material safety data sheets (MSDS) pertinent to the contractors work,
4.1.4 Consider contractor impacts and actions associated with the local emergency action/response plan;

4.1.5 Ensure information from the contractor concerning any unique, potential hazards presented by the contractor's work is transmitted to Venoco employees;

4.1.6 Perform occasional site visits to ensure compliance with the program, work scope and job requirements;

4.1.7 Ensure the completion of a site specific safety orientation for all contractor employees prior to the start of work, and that this training has been properly documented.

4.1.8 With the assistance of the HES representative, ensure the completion of a pre-job safety meeting prior to the start of major jobs. The safety meeting should address, at a minimum, the following and be documented.

- Scope of work;
- Roles and responsibilities;
- Known and potential hazards;
- Logistics;
- Health, Environment and Safety (HES) requirements;
- Communications between parties;
- Venoco work permit requirements;
- Emergency notification and response.

4.1.9 Perform a post-job evaluation of the contractors at the closure of the contracted work. Complete the Contractor Post Job Evaluation (Appendix D).

4.2 HES Department

4.2.1 Monitor the application and implementation of the Contractor Safety Management Program;

4.2.2 Assist the Venoco Sponsors in contractor approval process and execution of the program elements;
4.2.3 Review and update contractor information, participate in auditing of contractor, and evaluate program implementation. Audit core contractors and contractors performing higher risk work;

4.2.4 Maintain a contractor injury and accident log including any follow-up investigations and reports.

4.2.5 Ensure that revisions are made to this Program as part of the company's commitment to quality, safety and continuous improvement.

4.3 Venoco Contracts/Purchasing Manager

4.3.1 Provide new contractors with a copy of the Venoco Contractor Safety Management Program (CSMP) including Appendices A, B, C, D, and E as part of the Venoco Master Services Agreement (MSA) pre-approval process.

4.3.2 Ensure receipt of CSMP Appendices A & B from the contractor before contractor approval.

4.3.3 Ensure receipt of executed CSMP Contractor Signature Page from the contractor prior to contractor approval.

4.3.4 Coordinate contractor approval with the Venoco Sponsor and file all CSMP documents in the MSA file.

4.3.5 Maintain the Venoco “Approved Contractors Database.”

4.4 The Contractor

4.4.1 Contractor management shall be solely responsible for their employees and to ensure that each contract employee follows the contractor's safety rules and those of the facility, including safe work practices.

4.4.2 Contractor management shall ensure all employees and sub-contractor employees have received a facility site safety orientation, conducting periodic job site visits, participating in pre-job safety meetings, and comprehensive enforcement.

4.4.3 Contract Company must provide that employee(s) are fluent (able to speak and read) in English as it is a “business necessity” as defined in Government Code 12951 and
necessary for the safe and efficient operation of the business. If the contract company believes that it has an alternative practice that would ensure accomplishment of the business and safety purposes equally well with nonfluent employee(s), it may propose such practice, but acceptance is in the sole discretion of Venoco.

4.4.4 Contract companies shall certify that their employees are trained and qualified in the craft skills including, but not limited to the standards and applicable safe work practices associated with their work.

The contract company will ensure the completed Contractor Safety Pre-Qualification Safety & Health Questionnaire (Appendix A) and the Job Skills Qualification and Safety Information sheet (Appendix B) is returned to the Venoco Sponsor.

4.4.5 Contractor must inform the Venoco sponsor or designated representative before changing or substituting personnel working on Venoco projects.

4.4.6 Contractors shall provide the Venoco facility/field supervisor with an immediate verbal report of any hazards identified, caused by the contractor's work or Venoco; and take action to prevent injury or incident.

4.4.7 All spills and unplanned releases regardless of their size, OSHA recordable injuries or illnesses, property damage, or other significant incidents occurring at the job site require immediate verbal reporting to the Venoco facility supervisor.

4.4.8 Within one business day, following the incident, contractors shall provide Venoco with a copy of the contractor's written initial incident report for OSHA recordable injuries or illnesses, spill or release, or property damage. The contractor will provide Venoco any follow up information pertaining to the cause and corrective actions taken to prevent similar occurrences.

4.4.9 Venoco may elect to perform its own incident investigations of contractor incidents when:

- Venoco employees, products, or equipment are involved.
Venoco employees, products, or equipment had the potential to have been negatively impacted.

Harm to the environment was caused on a Venoco property, lease, or property.

4.4.10 The contractor shall submit to the Venoco facility HES representative the Contractor Monthly Safety History Report (Appendix E), if requested, each month for the duration of the job.

4.4.11 The Contractor will sign and return the CSMP Signature Page; and completed Questionnaires (Appendices A & B) to the Venoco Contracts/Purchasing Manager or sponsor for review and approval.

5.0 Program Procedure

5.1 Contractor Approval will be granted once the following specific elements of the Contractor Safety Management Program (CSMP) have been completed and received:

5.1.1 CSMP Contractor Signature Page is signed and filed with the MSA.

5.1.2 CSMP Appendices A and B have been reviewed and approved. Approved contractors must meet or exceed the following minimum requirements:

A. Have an EMR of 1.2 or less; or a loss ratio not greater than 75%*

(*Loss ratio is the amount of WC losses for a given period divided by the amount of premium paid).

B. Have an OSHA Total Recordable Incident Rate equal or less than the National average for their SIC Code as published by the Bureau of Labor Statistics.

C. Have a written and fully implemented safety and loss prevention program.
D. Have a written and fully implemented Alcohol and Substance Abuse Program as permitted by state law.

5.1.3 For PHMSA pipeline contractors:

5.1.3.1 Verification of PHMSA compliant drug and alcohol substance abuse prevention plan;

5.1.3.2 Verification of pipeline operator qualification (OQ) for each employee performing covered pipeline tasks.

5.1.4 All CSMP documents will be retained in the contractor MSA file or project file for a period of five years.
Contractor Signature Page
(Return this page to Venoco Sponsor including Appendices A & B)

Signature certifies that the contractor has received and reviewed the Venoco Contractor Safety Management Program information including all attached appendices. The contractor certifies that the information provided in Appendix A & B is accurate and up-to-date. The contractor accepts and agrees to all conditions and requirements of the Venoco Contractor Safety Program.

Authorized Signature: ___________________________ Date: ___________________________

(Company Manager/Corporate Executive)

(Print/Type Name)

(Title)

(File with MSA)
# Appendix A

## VENOCO Inc.

### CONTRACTOR PRE-QUALIFICATION

### SAFETY AND HEALTH QUESTIONNAIRE

**Contractor Information (please print or type)-**

<table>
<thead>
<tr>
<th>Contractor Name:</th>
<th>Subsidiary/Division of:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Corporate Address:</td>
<td>Street or P.O. Box:</td>
</tr>
<tr>
<td>City and State:</td>
<td>Zip Code:</td>
</tr>
<tr>
<td>Local Address: (if different from above)</td>
<td>Street or P.O. Box:</td>
</tr>
<tr>
<td>City and State:</td>
<td>Zip Code:</td>
</tr>
<tr>
<td>Emergency Contact:</td>
<td>Title:</td>
</tr>
<tr>
<td></td>
<td>Telephone Number:</td>
</tr>
</tbody>
</table>

**Safety Information (OSHA statistics and EMR figures must be provided.)-**

Please use your past OSHA 300 Logs to record the number of injuries and illnesses for the last three (3) years. **Note: Attach copies of the last 3 years’ OSHA 300 Logs to this questionnaire.**

<table>
<thead>
<tr>
<th>Record last three years</th>
<th>20___</th>
<th>20___</th>
<th>20___</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Man Hours Worked</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of fatalities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of lost work days</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of restricted work day cases</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of cases requiring medical treatment only</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>OSHA Total Recordable Incident Rate (TRIR)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Note: The following formula should be used when calculating the OSHA recordable incidence rate: \( \frac{\text{# of OSHA Recordable Cases} \times 200.000}{\text{# of man-hours worked}} \)**

List your firm’s Experience Modification Rate (EMR) or insurance loss ratios for the three most recent years. Rates above 1.2 (EMR) or 75% loss ratio will require explanation.

<table>
<thead>
<tr>
<th>Year</th>
<th>Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>20___</td>
<td></td>
</tr>
<tr>
<td>20___</td>
<td></td>
</tr>
<tr>
<td>20___</td>
<td></td>
</tr>
</tbody>
</table>

**Are injury/illness reports (OSHA 300 Log) reviewed by the following? How often?**

<table>
<thead>
<tr>
<th>President</th>
<th>How Often?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vice President</td>
<td>How Often?</td>
</tr>
<tr>
<td>Field Superintendent</td>
<td>How Often?</td>
</tr>
<tr>
<td>Site Foreman</td>
<td>How Often?</td>
</tr>
</tbody>
</table>

**Do you hold safety meetings for all your employees?**

YES____ NO____

**Do you conduct onsite safety inspections?**

YES____ NO____

If “YES,” who conducts the inspections?
VENOCO Inc.
CONTRACTOR PRE-QUALIFICATION
SAFETY AND HEALTH QUESTIONNAIRE

How is injury/illness data maintained?

<table>
<thead>
<tr>
<th>How often is it reported?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Totaled for the entire company</td>
</tr>
<tr>
<td>Totaled by project</td>
</tr>
<tr>
<td>Subtotaled by superintendent</td>
</tr>
<tr>
<td>Subtotaled by foremen</td>
</tr>
<tr>
<td>Other</td>
</tr>
</tbody>
</table>

Questions
(Include copies or examples of programs/practices at your discretion)

1.) Do you have one or more employees devoted full time to the safety and health of your employees? If “yes,” how many, and who are they?

2.) Who is ultimately responsible for the safety and health of your employees?

3.) Do you have a written safety program, Injury and Illness Prevention Plan?

4.) Do you explain and give a copy of your safety program to each new or transferred employee?

5.) How do you measure your employees’ comprehension of safety and health training?

6.) Do you have employees who do not speak or read English? If “yes,” do you provide duplicate material printed in their language? If “yes,” are interpretive services provided at work site?

7.) How many employees do you presently employ?

8.) What type of work does your company primarily perform, and how long has it been in business?

9.) Are there any unique hazards presented by your work? If “yes,” what are they?
**VENOCO Inc.**

**CONTRACTOR PRE-QUALIFICATION**

**SAFETY AND HEALTH QUESTIONNAIRE**

<table>
<thead>
<tr>
<th>Briefly describe your company’s program on the following: (include copies or examples of programs/practices at your discretion)</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.) Turnover and Absentee Rate:</td>
</tr>
<tr>
<td>11.) Alcohol and Drug Abuse Program (Define if DOT program):</td>
</tr>
<tr>
<td>12.) Quality Assurance and Control of Practices:</td>
</tr>
<tr>
<td>13.) Safety and Health Training:</td>
</tr>
<tr>
<td>14.) Craft Qualification:</td>
</tr>
<tr>
<td>15.) Short Service (i.e. part-time, transient) Employee Training Program:</td>
</tr>
</tbody>
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---

**Venoco Contractor Approval**

<table>
<thead>
<tr>
<th>HES : ____________________________ (Signature) ____________________________ (Date)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sponsor: ____________________________ (Signature) ____________________________ (Date)</td>
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</table>

*(Venoco Contracts/Purchasing Manager or sponsor to file form with original MSA or project PSO)*
Please Print or Type-

<table>
<thead>
<tr>
<th>Contract Employer: (Company)</th>
<th>Date:</th>
</tr>
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</table>

### For the following subjects, and frequency.

*Legend: Training verified by (W) Written Test (D) Demonstration (L) Lecture (O) Other

<table>
<thead>
<tr>
<th>Basic Training</th>
<th>Frequency</th>
<th>Training Verified By</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Safety Training (Mark “NA” if training item not applicable)</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 CPR and First Aid</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>2 Bloodborne Pathogens</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>3 Hot Work Practices</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>4 HAZWOPER (40 hr) (24 hr) (8 hr)</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>5 HAZWOPER Incident Commander</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>6 Excavation Safety</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>7 Hazardous Energy Isolation (Lockout/tagout)</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>8 Confined Space Entry</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>9 Confined Space Entry Rescue</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>10 Fall Protection</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
<tr>
<td>11 Electrical Safe Work Practices</td>
<td>W</td>
<td>D</td>
<td>L</td>
</tr>
</tbody>
</table>
**Appendix B**  
VENOCO Inc.  
CONTRACT COMPANY  
JOB SKILLS QUALIFICATION  
AND SAFETY TRAINING INFORMATION

*Legend: Training verified by (W) Written Test (D) Demonstration (L) Lecture (O) Other

<table>
<thead>
<tr>
<th>Basic Training</th>
<th>Frequency</th>
<th>Training Verified By</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>12 Hazard Communication</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>13 Personal Protective Equipment</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>14 Hearing Conservation</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>15 Respiratory Protection (Specify Respirators Authorized)</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>16 H2S Training</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>17 Basic Fire Safety</td>
<td></td>
<td>W D L O</td>
<td></td>
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</table>

**Job Qualifications**

<table>
<thead>
<tr>
<th>Job Qualifications</th>
<th>Frequency</th>
<th>Training Verified By</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>18 Crane Operator Certification</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>19 Crane Rigger and Rigging</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>20 Well Control- Drilling</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>21 Well Control- Completion/Workover</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>22 Well Control- Servicing</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>23 Forklift Certification</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>24 Electrical Qualification</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>25 MMS T-2 (Production Safety Systems)</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>26 Welding Certification</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>Basic Training</td>
<td>Frequency</td>
<td>Training Verified By</td>
<td>Comments</td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>-----------</td>
<td>----------------------</td>
<td>----------</td>
</tr>
<tr>
<td>EMT Medical Qualification</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>Scaffolding Competent Person</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>Excavation Competent Person</td>
<td></td>
<td>W D L O</td>
<td></td>
</tr>
<tr>
<td>DOT Pipeline Operator Qualification</td>
<td></td>
<td>W D L O</td>
<td>Specify Tasks:</td>
</tr>
</tbody>
</table>

Contractor Signature: _______________   _______________   _______________
(Area or Local Office Manager) (Type Name) (Title)
Venoco Contractor Approval

Venoco Approval: ______________________________ (Signature) ______________________________ (Date)

(Venoco sponsor to File form with MSA or project PSO)
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1.0 INTRODUCTION

This information has been prepared to advise contractors performing work at Venoco Inc. facilities of the standard safety rules, policies, and procedures that shall be met by the contractor. Additional site specific information will be provided during a site specific safety orientation. No attempt is being made to instruct contractors or their employees in safe work practices. This is the responsibility of the contractor, unless Venoco directly supervises the contract employees. Any question regarding the application of these rules should be directed to the Venoco representative responsible for the contracted work or Venoco HES personnel. Contractors and subcontractors are notified with this information that violation of any of the rules, policies, or procedures presented in this package may result in immediate termination. Contract personnel must arrive on site fully trained and qualified to perform the tasks agreed to under the contract.

2.0 DRIVING AND VEHICLE SAFETY

2.1 When using facility/lease roads, be aware of trucks and heavy equipment on the roadway. Speed limits are as follows:

- Within gated facility locations, shop areas, and yards: < 10 MPH.
- Lease roads are limited to 15 MPH.
- Within processing areas and production pads: < 5 MPH.

2.2 Do not drive through any observed hazards: e.g., smoke, vapor clouds, barricades, etc. Be aware of activities on the road and along side the road. No vehicle shall be left unattended with the engine running.

2.3 A Hot Work Permit is required from Venoco Operations for any motorized vehicle entering within 10 feet of facility or field production areas where hydrocarbons are present.

2.4 Parking is generally limited. Park only where it is clearly identified as a parking area, or check with Venoco Operations on alternative parking locations.
3.0 ENTRY AND ACCESS

3.1 All visitors, vendors, service personnel, regulators, contractors and subcontractors, etc., must stop and check-in/sign-in or obtain verbal approval with a Venoco representative prior to entry.

3.2 Permission to enter the facility process, production or drilling locations shall be obtained from the appropriate Venoco representative. Contractor personnel shall inform appropriate Venoco supervision of their presence and secure the necessary permits, if necessary, prior to performing any work on Venoco properties.

   **Exception:** Drivers of trucking companies or delivery services which are only there for the time it takes to be unloaded and are accompanied by a Venoco representative; and trucking company personnel who have received appropriate VENOCO site safety orientation and safe operating instructions.

3.3 All visitors and contractors/subcontractors will receive a site safety orientation prior to working or touring Venoco work sites. Typically, this orientation will occur at the facility location.

3.4 Crew boat is the primary method of transportation to Federal outer continental shelf (OCS) or State waters platforms. Personnel going to these work locations will receive additional instruction on crew boat safety, and personnel transfer practices such as using a “swing rope”, “Billy Pugh” or “Frog” personnel carrier.

3.5 Some Venoco facilities may have additional access and security measures. Check with the Venoco representative.

4.0 SMOKING POLICY

4.1 In California, State law prohibits smoking in all office buildings and administrative areas. Check with your sponsor on the designated smoking locations.

4.2 For all Venoco production, process, drilling and construction locations smoking is strictly prohibited, except in designated areas. Check with your sponsor on designated smoking locations.
4.3 It is prohibited to carry or use lighters or matches in production or process locations, drill sites, or well pads.

5.0 SUBSTANCE ABUSE PREVENTION

5.1 Contractors must assure a drug-and-alcohol-free work place. All contractors are subject to the conditions and prohibitions of Venoco’s Drug Abuse and Alcohol Misuse Prevention Policies.

5.2 Alcoholic beverages, illegal drugs, and firearms are not permitted on Venoco facility or lease property. Contractors shall not report to work under the influence of alcoholic beverages, illegal drugs, or prescribed medicines that impair their ability to work safely.

5.3 Contractors performing work on Department of Transportation (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) regulated pipelines must have a DOT compliant substance abuse prevention program in accordance with 49 CFR Part 199 Subpart 40. The contractor must agree to third party auditing of its program, the program must be deemed “approved” prior to the start of work. Venoco’s DOT and Non-DOT Drug Abuse and Alcohol Misuse Prevention Policies are available by request.

5.4 Unannounced contraband inspections are conducted at all Venoco locations. Venoco reserves the right to inspect lockers, and any or all vehicles, trailers, packages, toolboxes, containers, etc., which are brought within the facility or lease property limits.

6.0 GENERAL SAFETY

6.1 Contract personnel shall not remove any Venoco materials or equipment from the facility or lease, regardless of its classification as scrap, etc., without obtaining the written permission of appropriate Venoco supervision.

6.2 Contract personnel are not permitted to loiter, or hold meetings or gatherings within the confine of the facility or lease property without the written permission of Venoco.

6.3 Contractors and subcontractors shall not start or stop machinery, equipment or processes, open or close any valves, operate electrical systems of a Venoco facility, field or lease without having received prior
operating instructions and specific approval of an authorized representative of Venoco.

6.4 VENOCO tools or equipment will not normally be used by contractors. In any case, where Venoco equipment is provided to a contractor for their use, no liability is assumed by Venoco for its conditions, its applicability for the job, or for its safe use. All supervision and safety instruction is the responsibility of the contractor.

6.5 Personnel with facial hair that may interfere with the use of a respirator (such as beards, goatees, long mustaches, or long sideburns) will not be allowed to enter Venoco facilities or leases where respiratory protection equipment is used for routine duties or emergency response.

6.6 Taking pictures is prohibited unless approved by Venoco supervision. The use of cellular phones and pagers are not permitted on Venoco platforms; or within facility or lease process/production classified areas, unless they are intrinsically safe.

6.7 Makeshift tools or apparatus such as the use of a "cheater bar" is prohibited.

6.8 A work permit shall be obtained from Venoco Operations prior to the start of all work. Venoco Operations shall be notified before starting any work.

6.9 Contractor and subcontractor personnel working at Venoco OCS or State waters platforms must be H2S Safety certified (card carrying) before reporting to the Venoco job site. Do not expect to be trained by Venoco.

7.0 PERSONAL PROTECTIVE EQUIPMENT

7.1 Providing all necessary personal protective equipment, and appropriate qualifications is the responsibility of the contractor. All PPE shall be used, maintained, and inspected per the manufacturer’s recommendations.

7.2 Contractors requesting use of VENOCO respiratory protection equipment must provide certification that proper instruction and medical approval for respirator use has been completed for contractors' personnel using the equipment.
7.3 Hard hats meeting the ANSI Z89.1 specification must be worn by contractor personnel and visitors at all times while in facility process areas, other designated areas, or where ever possible head injuries exist.

7.4 Eye protection meeting ANSI Z-87.1 specifications are required for all contractors or visitors at all times when in facility process areas, chemical drum storage areas, maintenance shop, or when eye hazards from flying particles exist. Side shields are not required, but recommended. Clear safety glasses shall be provided by the contractor for all night work.

7.5 Additional face and eye protection such as side shields, face shields, and/or goggles is required whenever there is the possibility of eye injury while performing high eye hazard activities such as chemical transfer, grinding, chipping, or wire brushing.

7.6 Hearing protection is required in designated areas of the facility or production lease where posted with signs stating "Hazardous Noise Area." Hearing protection is recommended in all work areas.

7.7 A full body harness with attached lanyard is required at all times when performing work above six (6) feet off the ground and not protected by an approved guardrail or other fall protection system. The lanyard shall always be attached to a solid object and above the waist. When working at heights where it is necessary to disengage a lanyard to move around equipment or obstacles, a double lanyard (100% tie-off) must be used.

7.8 Personnel shall be adequately clothed at all times. Synthetic material is prohibited except for chemical protective clothing or rain gear as necessary. Cotton only, full-length trousers, short or long sleeve shirts, hard hat, safety glasses and steel toe shoes are standard work uniform.

7.9 Fire retardant or resistant clothing (FRC) meeting the requirements of NFPA 2112 is required for ALL personnel working at production, drilling and completions work locations; and for electrical "qualified persons" and "electrical workers" when working on live electrical systems and equipment.

7.10 Contractors whose personnel wear additional PPE over standard work uniform must ensure adequate Heat Stress Prevention program is in place and practiced.
8.0 WORK PERMIT SYSTEM

8.1 Venoco utilizes a “Permit-to-Work” program used to identify and evaluate work task hazards, and to ensure that the personnel responsible for an operating area are aware of all work occurring in that area through requirements for communication and “hand-off” practices between all parties involved.

8.2 A Venco Hot Work Permit is required before any work which might create a spark or source of ignition, except when in designated hot work areas.

8.3 A Venoco General Work Permit applies to all work involving the opening of equipment or piping containing flammable or combustible materials, or chemicals; production or process systems; and for initiation of drilling and well servicing. A General Work Permit may also be required for construction projects and other maintenance or inspection services.

8.4 A Venoco Confined Space Entry Permit or a contractor’s permit program approved by Venoco is required to enter any tank, vessel, pit, excavation, tunnel, or other confined space.

8.5 Work permits are issued by the Venoco facility/field operations personnel or Venoco on-site supervisor. Permits are typically issued daily for a twelve (12) hour period, or sixteen (16) hours under an approved extension, and must be renewed at the beginning of each shift.

9.0 HOT WORK

9.1 Hot Work is any work which might create a spark or source of ignition. Typical ignition sources include electrical power tools, welding, cutting, grinding, non-intrinsically safe equipment, stress relieving, vehicles and other combustion devices, etc.

9.2 Hot Work shall be conducted as authorized by the Venoco field/facility supervision. Hot Work shall be conducted in accordance with Venoco’s Hot Work Plan or the contractor’s written hot work procedures if reviewed and approved by Venoco prior to start of work.
9.3 Hot Work is allowed in designated locations only, and must not be conducted within 35 feet of vegetation or other combustible materials, or within 100 feet of process or production areas containing flammable liquid or gas. All hot work will include a trained fire watch, a fire extinguisher or other necessary firefighting equipment, and an approved Venoco or contractor Hot Work Permit.

10.0 CONFINED SPACE ENTRY PERMIT

10.1 A confined space is any vessel, sump, vat, tank, hole, trench, well cellar or enclosed space large enough and configured to allow entry, has limited entry and egress, and is not designed for human occupancy. Entry into confined spaces requires a Venoco Confined Space Entry Permit. A contract company confined space entry procedure may be utilized in lieu of the Venoco program if reviewed and approved by Venoco prior to the entry occurring.

10.2 Entry into “permit-required” confined spaces will require dedicated emergency services. The contractor must ensure that adequate qualified emergency services are provided outside of the Venoco facility or field operations personnel.

11.0 HAZARDOUS ENERGY ISOLATION (LOCKOUT/TAGOUT)

11.1 An OSHA compliant hazardous energy isolation (lockout/tagout) procedure or practice shall be used to ensure all equipment or processes are properly isolated prior to work. The Venoco Lockout/Tagout (LOTO) Program shall be followed by all contractors, except in cases of contractor owned and operated equipment; or in cases where the contractor’s program has been reviewed and approved by Venoco. Venoco will isolate and lockout/tagout all Venoco equipment or processes, and return this equipment to normal service when the work is completed. Contractors are required to provide their own locks for their employees. Individual and “group” lockout/tagout methods are utilized and accepted by Venoco.

12.0 HAZARD COMMUNICATION

Venoco uses and stores a variety of chemicals and hazardous materials at its facilities, production and work locations. You are advised of potential exposures to hazardous materials through a site specific orientation program, job tailgate safety meetings, and the Venoco permitting system. MSDSs for all materials on
the work location are available for your information via Venoco’s MSDSonline system.

12.1 **Contractors are required** to provide MSDS for all chemicals that are brought onto Venoco property. Notification to Venoco of hazardous chemicals that you may bring into facility and lease areas must be completed prior to your arrival on location.

12.2 **PROP 65 WARNING**: In accordance with California state law (Prop 65), Venoco facilities in California contain substances known to the State of California to cause cancer or reproductive harm. Please see your sponsor if further information is needed.

13.0 **HAZARDOUS MATERIALS & WASTE**

13.1 **All** containers and tanks brought onto Venoco sites, which store chemicals or hazardous materials shall be labeled or marked as to their contents and hazard rating. Water tanks shall be labeled appropriately.

13.2 Spills and leaks to the ground or waterways shall be prevented to the extent possible. Motorized equipment, tanks, containers, and associated piping and hoses must be monitored for leaks. All leaks and spills will be contained and cleaned up immediately. Provisions shall be provided to capture leakage from equipment that may leak during operation, or during equipment breakdown and demobilization.

13.3 Do not pour any type material down any drain system, unless specifically authorized to do so by Venoco supervision.

13.4 Do not place any type of chemical or hazardous material in a trash can. Always check first with your Venoco representative to identify proper waste disposal and manifesting requirements.

14.0 **EMERGENCY RESPONSE**

14.1 All emergency incidents shall be immediately reported to the Venoco Operations Supervisor and/or Venoco on-site supervisor.

14.2 Emergencies will be responded to following the procedures specified in each facility’s or field’s emergency response plans. Site specific emergency plans must be developed for remote locations. Know what to do in an emergency; alarms, notifications, egress routes, and know where
designated safe assembly areas are located. Detailed information will be provided during your site specific safety orientation.

14.3 Contractors may participate in facility or field emergency response drills conducted by Venoco to ensure the effectiveness of the emergency response plan.

15.0 ACCIDENT AND INJURY REPORTING

15.1 All incidents including injuries or illnesses, spills, releases, fire/smoke, security event, property damage, etc. shall be verbally reported immediately, regardless of how minor, to the Venoco Operations Supervisor, and/or Venoco on-site supervisor. Contractors shall provide Venoco with an initial written report within 24 hrs of the incident.

15.2 If the incident warrants, Venoco may request an investigation of the event including follow-up with the appropriate Venoco personnel to identify root causes and to prevent reoccurrence.

16.0 EMERGENCY MEDICAL INFORMATION

16.1 All Venoco operations personnel are certified in First Aid and CPR.

16.2 Treatment and transportation of injured personnel is the responsibility of the contractor. However, Venoco will provide transportation at the request of the contractor, if advisable.

16.3 Serious medical cases will be managed by the activation of the Venoco Emergency Action Plan and “9-1-1” notification.

16.4 Contractors must identify local medical and emergency response resources nearest to their work and ensure these resources are available prior to the start of work. Your Venoco sponsor or Venoco HES representative may have information on the location of the nearest medical services.
The contract company foreman or lead person and the Venoco employee overseeing the project each complete one copy of this form. It is recommended that the contractor and Venoco complete this document together prior to leaving the work location.

**Contractor Name:**

**Venoco Facility:**

**Date Form Completed:**

**Project Completed:**

**Duration of Job:**

**Contractor Information**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Were there malfunctions in the contractors’ equipment?</td>
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<td>Was proper guidance given by Venoco as to what was expected of the contractor on the job?</td>
<td>Yes</td>
<td>No</td>
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<td>Was the proper equipment used for this job?</td>
<td>Yes</td>
<td>No</td>
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<td>Did all employees have the job skills and safety training needed to complete this job?</td>
<td>Yes</td>
<td>No</td>
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<td>Were any hazards unique to the contractors’ work discovered during this job?</td>
<td>Yes</td>
<td>No</td>
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<td>Were there any incidents or near misses during this job?</td>
<td>Yes</td>
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If “yes”, please explain:

**Comments:**

**Venoco Sponsor or Designee**

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**Contractor Supervisor:**

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(File form with PSO or project file)
**CONTRACTOR MONTHLY SAFETY HISTORY REPORT**

A. Company Name: ________________________________  Month: ____________________

B. Enter all projects or Venoco supervised man hours worked.

C. List all incident data pertaining to Venoco.

<table>
<thead>
<tr>
<th>Facility/Location</th>
<th>*Project Hours</th>
<th>Total Hours Worked</th>
<th>First Aid Cases</th>
<th>OSHA Recordable Injuries</th>
<th>Lost Time or Restricted Duty Cases</th>
<th>Non-Injury Incidents (Fire, Property Damage, Spill, Release, etc.)</th>
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*Project Hours – hours worked at a Venoco facility, lease or project. Typically the same as Total Hours Worked.

Please mail, fax or email to: Venoco HES Representative, Attn: Bukola Ishola
6267 Carpinteria Ave.
Carpinteria, CA 93013
Email: bukola.ishola@venocoinc.com
Fax: 805-745-1176

Responsible Person:

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