



PURPOSE

Define the Company's Environmental Management Policy and Procedures.

SCOPE

All employees of PIONEER PRODUCTION SERVICES, INC.

ENVIRONMENTAL STATEMENT

The company, its management, and employees' pledge:

- To be good stewards of the Earth by protecting and, where practicable, improving the land and water resources where we conduct our operations.
- To promote environmental awareness and a sense of environmental responsibility in our employees, suppliers and clients, providing training as required.
- To communicate with governments and other agencies responsible for creating effective laws and regulations to safeguard the environment while carrying on vital resource exploration.
- To maintain the highest degree of integrity with our clients, government officials, and the public in addressing environmental concerns, being especially diligent to deliver what we promise, recognizing that public trust is difficult to build, but simple to shatter.
- To make environmental considerations a priority in our planning and development of products and services.
- To be especially vigilant when working in environmentally unique areas.
- To require a firm commitment to environmentally responsible operations from our suppliers and subcontractors, especially those involved with the transportation or disposal of hazardous or waste materials.

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- To demonstrate by our actions at every level of the company, that the company and all of its employees are truly committed to these principles.
- To be committed to continual improvement and prevention of pollution.
- To establish and maintain environmental performance objectives throughout the organization.

ENVIRONMENTAL IMPACTS AND ASPECTS

The HSE Director is responsible for identification of environmental **aspects**, evaluation of their **impacts**, and prioritizing the significant **aspects**.

The HSE Director is responsible to carry out the **aspect** and **impact** analysis. The company has established a separate procedure for identifying environmental aspects and impacts and the evaluation of their impacts.

Procedure describes:

- The method for identifying environmental **aspects** and evaluating the associated **impacts**.
- Evaluation criteria for **impacts**.
- Significance criteria for **aspects**.

Provisions are also made in the procedure for considering the following requirements during analysis of **aspects** and **impacts**.

- Regulatory requirements
- Interested party concerns
- Evaluation of impacts
- Resource saving potential

Once rated operations are received, the HSE Director will be responsible for entering them into an **Aspect/Impact database**. This database will be used to track operations, aspects, objectives and targets, and completion dates. This database will be available to all personnel involved with activities impacting the environment. These aspects will also be reviewed annually for any changes within the department, or area of responsibility. In addition to the annual review company personnel can evaluate any existing aspect or impact at any time.

RECORDS

The HSE Director will keep records of all identified **aspects/impacts** and the evaluations.

IDENTIFICATION AND EVALUATION OF ENVIRONMENTAL ASPECTS AND IMPACTS

RESPONSIBILITY AND AUTHORITY

The HSE Director is responsible for developing a rating system for **impacts** and **aspects**. Department heads are responsible for ensuring all personnel receive and understand the rating form.

All operations to be rated shall be done using the *Evaluation of Significant Environmental Impact Form*. Operations should be separated by normal and other than normal conditions and the appropriate form used for either.

Once the operation is rated, a category of significance shall be assigned from the *Determination of Significance Worksheet* and the rating sheet turned in to the HSE Director.



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These operation ratings may be conducted for any operation performed throughout the company. This procedure should be initiated when there is a change in operations in order to determine if there are any new environmental aspects and, if so, to evaluate their environmental impacts.

**Evaluation of Significant Environmental Impacts
NORMAL Operating Conditions (NOC)**

Department:		Date:
Process or Activity:		Category of Significance:
Aspect:		
Impact:		

Categories	Evaluation	Score
(a) Nature and scale of impact or effect:	Cause of long term (>6 mo) measurable environmental impact	<input type="checkbox"/> 0
	Cause of short term environmental impact	<input type="checkbox"/> 1
	Does not cause a measurable environmental Impact	<input type="checkbox"/> 2
(b) Quantities consumed, released, discharged, or disposed	High (worst case discharge)	<input type="checkbox"/> 0
	Medium	<input type="checkbox"/> 1
	Low	<input type="checkbox"/> 2
(c) Legal or organization control:	Non compliance or high potential for non-Compliance	<input type="checkbox"/> 0
	Within compliance at all times	<input type="checkbox"/> 1
	Not regulated	<input type="checkbox"/> 2
(d)	History of complaints, legal actions past or pending	<input type="checkbox"/> 0



Section 1: Leadership and Commitment

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Approved by: WJB

Version: 5.0

Last visited: 04/2017

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Interested parties:	Target of interest of one or more stakeholder groups, in the past, present, or in the future	<input type="checkbox"/> 1
	No focus of interest in the past or anticipated	<input type="checkbox"/> 2

* To arrive at the final score multiple (a) x (b) x (c) x (d) =

Evaluation of Significant Environmental Impacts
OTHER Operating Conditions (Abnormal/Emergency) (OOC)

Department:		Date:
Process or Activity:		Category of Significance:
Aspect:		
Impact:		

Categories	Evaluation	Score
(a) Scale of Impact:	High	<input type="checkbox"/> 0
	Medium	<input type="checkbox"/> 1
	Low	<input type="checkbox"/> 2
(b) Chance of happening:	High (once per 6 months)	<input type="checkbox"/> 0
	Medium	<input type="checkbox"/> 1
	Low (once per 3 years)	<input type="checkbox"/> 2
(c) Likelihood of detection:	Low (no monitoring or detection)	<input type="checkbox"/> 0
	Medium	<input type="checkbox"/> 1
	High (continuous monitoring or inspection)	<input type="checkbox"/> 2

(d) State of preparedness:	No provision made or mitigation not possible	<input type="checkbox"/> 0
	Some provisions made	<input type="checkbox"/> 1
	Detailed plans, training, and exercises	<input type="checkbox"/> 2

* To arrive at the final score add (a) + (b) + (c) + (d) =

DETERMINATION OF SIGNIFICANCE

The environmental aspect is scored under NOC or OOC to determine if it is significant.

Under NOC the score is determined by multiplication

$$\text{NOC score} = (a) \times (b) \times (c) \times (d)$$

Score = 0	Significant and requires a program of action	Ranking A
Score = 1 to 8	Significant, but existing controls may be sufficient	Ranking B
Score = 16	Not significant	Ranking C

Under OCC the score is determined by addition

$$\text{OOC score} = (a) + (b) + (c) + (d)$$

Score < 5	Significant and requires a program of action	Ranking A
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GENERAL WASTE MANAGEMENT

PPSI will estimate the waste that will be generated prior to work being performed so that the need for containers and waste removal, if necessary, can be determined.

Waste materials should be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.

PPSI employees will be instructed on the proper disposal method for wastes. This may include general instruction on disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees must be trained to ensure proper disposal.

PPSI encourages proper segregation of waste materials to ensure opportunities for reuse or recycling.